
APPENDIX G

APPENDIX G

Correspondence with Indian Tribes and Communities

This appendix contains copies of the following letters associated with Native American consultation for the Proposed Action.

- ?? Sample letter to Indian Tribes and Communities requesting information on their interest in the Proposed Action dated March 15, 2002
- ?? Letter of Response from Cocopah Indian Community dated March 22, 2002
- ?? Letter of Response from Tohono O'Odham Nation dated April 24, 2002
- ?? Letter of Response from Hopi Indian Tribe dated April 29, 2002
- ?? Letter of Response from Hopi Indian Tribe dated July 3, 2002
- ?? Letter to Ak-Chin Indian Community from BOR (including copy list) dated August 27, 2002
- ?? Letter of Response from Hopi Indian Tribe dated September 3, 2002
- ?? Letter of response from Ak-Chin Indian Community dated October 25, 2002
- ?? Letter of Response from Tohono O'Odham Nation dated February 25, 2003
- ?? Letter and related information to Bookman-Edmonston initiating components of the Cultural Resources Inventory Program dated April 2, 2003
- ?? Letter from Ahamakav Cultural Society, Chad Smith, dated April 16, 2003
- ?? Letter to Ahamakav Cultural Society, Chad Smith, dated June 5, 2003



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF RECLAMATION
Yuma Area Office
7301 Calle Agua Salada
Yuma, Arizona 85364



filed to T.H. Ciment
a E. Huber
3-22
RECEIVED
3/18/02

YAO-7210
ENV-3.00

MAR 15 2002

Mr. Samuel Rideshorse
Superintendent
Bureau of Indian Affairs
Fort Yuma Agency
P.O. Box 11000
Yuma AZ 85366-1100

Subject: Native American Consultation - Wellton-Mohawk Irrigation
and Drainage District (District) Title Transfer Project
(Project)

Dear Mr. Rideshorse:

As a Federal agency, the U.S. Bureau of Reclamation (Reclamation) must ensure that Native American interests are considered prior to implementation of a proposed action. This responsibility is set forth in the National Environmental Policy Act (NEPA), the National Historic Preservation Act, the American Religious Freedom Act, and Executive Order 13007.

Reclamation and the District, which is a cooperating agency in the NEPA review process, have engaged Navigant Consulting, Inc., to prepare an environmental impact statement (EIS) for the Project. The purpose of this letter is to request input from the Quechan Tribe regarding the Project and its potential effects, if any, on Tribal resources and interests, including, but not limited to, sacred sites, traditional cultural properties, and traditional use areas within the Project area. For your information, a brief project description and map of the area of potential effect are enclosed. Please note that Antelope Hill will not be among the Federal properties for which title is transferred.

Please contact Mr. Jack Simes, Native American Affairs Coordinator, at 928-343-8334, to identify a point-of-contact in the Bureau of Indian Affairs who can assist us with this request. For further information on the NEPA review, please contact Ms. Andrea Campbell, Natural Resources Specialist, at 928-343-8237.

Sincerely,

Jim Cherry

Jim Cherry
Area Manager

Enclosures

cc: ~~Mr. Martin Einert~~
Bookman-Edmonston
Engineering
201 East Washington,
Suite 340
Phoenix AZ 85004

Mr. Larry Killman
Wellton-Mohawk Irrigation
and Drainage District
30570 Wellton-Mohawk Drive
Wellton AZ 85365



THE COCOPAH INDIAN TRIBE

COCOPAH TRIBAL OFFICE

County 15th & Avenue G
Somerton, Arizona 85350

Telephone: (928) 627-2102 or 627-2061

Fax: (928) 627-3173

3/22/02

Mr. Jack Simes
Native American Affairs Coordinator
Bureau of Reclamation: Yuma Area Office
7301 Calle Agua Saluda
Yuma, AZ 85364

Dear Jack,

Jim Cherry, Area Manager, contacted the Tribe concerning identifying a point of contact for assistance in determining if an action is needed in the Wellton-Mohawk and Drainage District Title Transfer Project. For any help in this area please contact Paul Soto, Cocopah Tribal Resource Planner.

The preliminary report mentioned lands that would be transferred to the Wellton-Mohawk District, to ascertain if these areas had interest to the Tribe a map was requested from Martin Einet that was received on March 25th, 2002. The map showed lands that would be transferred that are adjacent to the Gila River. The Cocopah Tribe has a strong interest regarding this area due to historical and cultural ties to Tribes up-river that were maintained via a network of trails utilizing the Gila Valley.

It is important that the Wellton-Mohawk District understands and appreciates the Cocopah Indian Tribes interest in these lands and need to be consulted and advised of any activities that would disturb these lands.

If I can be of any other assistance please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Sherry Cordova".

Sherry Cordova, Chairperson
Cocopah Tribal Council

- 6.) The scope of this project will require an EIS!
- 7.) Public hearings also need to be scheduled in Gila Bend, Phoenix, Ajo, and Sells.
- 8.) Your comment period ending on August 30, 2002 is not sufficient time to complete EIS studies or complete a thorough tribal consultation.
- 9.) Field trips for tribal members, elders, cultural and spiritual leaders need to be completed.
- 10.) The Wellton-Mohawk Transfer Act (Public Law 106-221) of June 20, 2000, authorizing the Secretary of the Interior to transfer title to these works, facilities and lands may be flared in that now consultation took place with tribal governments.
- 11.) It is inappropriate for the Irrigation District to be evaluating environmental issues on a project in which they will benefit by receiving land!

This should be handled by the Bureau of Reclamation working with the tribes.
- 12.) It is inappropriate for the Irrigation District to be a cooperating agency on a project they stand to benefit by.
- 13.) Interested tribes should be invited to be cooperating agencies and work with the Bureau of Reclamation in evaluating this proposed transfer.
- 14.) Letters need to be sent to the Quechan Tribe, the Cocopal Tribe, the Colorado River Tribes, the Fort Mojave Tribe, Ak Chin Indian Community and the Yavapi Tribe. None of their tribes were on your attached list.
- 15.) A Letter needs to be sent to:
Beverline Johnson, Director
Hia-Ced O'odham Office
Tohono O'odham Nation
P.O. Box 837
Sells, Arizona 85634

Sincerely,



Peter L. Steere, Manager
Cultural Affairs Office

Cc: Jack Simes, Native American Coordinator
Bureau of Reclamation
Yuma Area Office
7301 Calle Agua Salada
Yuma, Arizona 85364

Barnaby Lewis
Cultural Preservaion
Gila River Indian Community
P.O. Box 2140
Sacaton, Arizona 85247

Earl Ray
Cultural Resources Manager
Salt River Pima -- Maricopa Indian Community
10005 East Osborne
Scottsdale, Arizona 85256

Jon Shumaker, Archaeologist
Ak-Chin Indian Community
47865 North Eco Museum Road
Maricopa, Arizona 85239



United States Department of the Interior

BUREAU OF RECLAMATION

Yuma Area Office
7301 Calle Agua Salada
Yuma, Arizona 85364

IN REPLY REFER TO:

LC-2541
ENV-3.00

AUG 27 2002

Mr. Jerry Enos
Ak-Chin Indian Community
42507 West Peters and Nall Road
Maricopa AZ 85239

Subject: Transmittal of Class I Cultural Resources Inventory
Report for the Wellton-Mohawk Title Transfer Project,
Yuma County, Arizona (LC-AZ-02-06 [P])

Dear Mr. Enos:

Reclamation, in conjunction with the Wellton-Mohawk Irrigation and Drainage District (WMIDD), has completed a Class I cultural resources inventory for the Wellton-Mohawk Title Transfer Project, Yuma County, Arizona. A copy is enclosed for your review and comment.

As we discussed in our meetings with you on July 11 and 12, 2002, the Class I cultural resources inventory report is now ready for your review. We would like to receive your comments as soon as possible during the following 60-day review period, but no later than October 28, 2002.

Reclamation would like to schedule a meeting with tribes interested in the Wellton-Mohawk title transfer project for sometime in early November 2002. The purpose of this meeting will be to discuss cultural resource issues relating to the project. Specifically, we would like to talk about the results of the Class I inventory and determine whether a Class II sampling inventory would be acceptable to the consulting parties, and if it is, discuss how such an inventory might be structured to address everyone's concerns. We have also extended an invitation to the Arizona State Historic Preservation Office to attend this meeting. The meeting agenda will tentatively include the following items:

- Welcome and Opening Remarks
- Class I Inventory Report Review and Discussion
- Field Inventory-Level and Structure Discussion
- Continuing Consultation
- Summary of the Day's Discussions and Closing Remarks

We welcome your suggestions regarding additional and/or specific discussion points to be added to the agenda. Please let us know as soon as possible when you are available during early November in order for us to set a date and time for the meeting. A subsequent letter confirming the meeting date and location will be sent to you as soon as those details become available.

Thank you for your continued interest in this project. Please send written comments on the Class I inventory report to:

Ms. Pat Hicks
Regional Archaeologist (LC-2541)
Bureau of Reclamation
Lower Colorado Regional Office
P.O. Box 61470
Boulder City NV 89006-1470

Written comments can also be e-mailed to Ms. Hicks at phicks@lc.usbr.gov, or to Compliance Archaeologist, Ms. Rene Kolvet, at rkolvet@lc.usbr.gov.

We look forward to receiving your comments and meeting with you in November. Please contact Ms. Hicks at 702-293-8705 or Ms. Kolvet at 702-293-8443 if you have any questions or concerns about the enclosed report.

Sincerely,

For


Jim Cherry
Area Manager

Enclosure

bc: Mr. Clyde L. Gould
Manager
Wellton-Mohawk Irrigation and
Drainage District
30570 Wellton-Mohawk Drive
Wellton AZ 85356

Mr. Larry Killman
Wellton-Mohawk Irrigation and
Drainage District
30570 Wellton-Mohawk Drive
Wellton AZ 85356

Mr. Martin Einert
Navigant Consulting, Inc.
110 Wyoming Street
Boulder City NV 89005

Ms. Sheila Logan
Navigant Consulting, Inc.
201 East Washington Street,
Suite 1750
Phoenix AZ 85004

Mr. Jeffrey H. Altschul
Statistical Research, Inc.
P.O. Box 31865
Tucson AZ 85751-1865

Commissioner, Attention: W-1500 (Hess)

Area Manager, Boulder Canyon Operations Office
Boulder City NV, Attention: LC-2541

Identical letters sent to:

Mr. Jerry Enos
Ak-Chin Indian Community
42507 West Peters and Nall Road
Maricopa AZ 85239

Ms. Nancy Nelson
Ak-Chin Indian Community
42507 West Peters and Nall Road
Maricopa AZ 85239

Ms. Deborah Baptisto
Ak-Chin Indian Community
42507 West Peters and Nall Road
Maricopa AZ 85239

Mr. Clinton Pattea
President
Fort McDowell Mohave/Apache Indian Community
P.O. Box 17779
Fountain Hills AZ 85269

Ms. Marcie Mattson
Cultural Preservation Representative
Fort McDowell Mohave/Apache Indian Community
P.O. Box 17779
Fountain Hills AZ 85269

Mr. Barnaby Lewis
Cultural Preservation
Gila River Indian Community
P.O. Box 2140
Sacaton AZ 85247

Ms. Mary V. Thomas
Governor
Gila River Indian Community
P.O. Box 2140
Sacaton AZ 85247

Ms. Lorraine Marquez Eiler
Hia-Ced O'Odham Alliance
4379 West Hayward
Glendale AZ 86301

Ms. Leigh Kuwanwisiwma
Director
Hopi Office of Cultural Preservation
P.O. Box 123
Kykotsmovi AZ 86039

Mr. Wayne Taylor, Jr.
Chairperson/CEO
Hopi Tribe of Arizona
P.O. Box 123
Kykotsmovi AZ 86039

Mr. Ron Chiago
Development Analyst
Salt River Pima-Maricopa Indian Community
10005 East Osborn
Scottsdale AZ 85256

Mr. Gary Gilbert
Salt River Pima-Maricopa Indian Community
10005 East Osborn
Scottsdale AZ 85256

Mr. Clayton Finkbonner
Act. Executive Director
Salt River Pima-Maricopa Indian Community
10005 East Osborn
Scottsdale AZ 85256

Mr. Ivan Makil
President
Salt River Pima-Maricopa Indian Community
10005 East Osborn
Scottsdale AZ 85256

Mr. Edward Manuel
Chairperson
Tohono O'Odham Nation
P.O. Box 837
Sells AZ 85634

Mr. Peter Steere
Manager, Cultural Affairs
Tohono O'Odham Nation
P.O. Box 837
Sells AZ 85634

Mr. Joseph T. Joaquin
Tohono O'odham Nation
P.O. Box 837
Sells AZ 85634

Ms. Elise Vincent
Gila River Indian Community
P.O. Box 2140
Sacaton AZ 85247

Ms. Angela D. Garcia
Gila River Indian Community
P.O. Box 2140
Sacaton AZ 85247

Ms. Ophelia V. Cruz
Gila River Cultural Advisory Committee
P.O. Box 1070
Sacaton AZ 85247

Ms. Sandra Jackson
Gila River Cultural Advisory Committee
P.O. Box 427
Sacaton AZ 85247

Ms. Janell M. Sixkiller
Director
Salt-River Pima-Maricopa
Indian Community
10005 East Osborn Road
Scottsdale AZ 85256

Ms. Amalia A.M. Reyes
Pascua Yaqui Tribe
7474 S. Camino De Oeste
Tucson AZ 85746

Mr. Ralph Goff
Chairman
36190 Church Road, Suite 1
Campo CA 91906-2732

Mr. Edward Smith
Chairman
Chemehuevi Tribal Council
P.O. Box 1976
Havasupai Lake CA 92362

Mr. David Halmo
Cultural Resources Coordinator
Chemehuevi Tribal Council
P.O. Box 1976
Havasu Lake CA 92362

Ms. Sherry Cordova
Chairperson
County 15 and Avenue G
Somerton AZ 85350

Ms. Lisa Wanstall
Director
Cocopah Tribal Museum
County 15 and Avenue G
Somerton AZ 85350

Mr. Paul Soto
Tribal Resource Planner
Cocopah Indian Community
County 15 and Avenue G
Somerton AZ 85350

Mr. Daniel Eddy
Chairman
Colorado River Indian Tribe
Route 1, Box 23-B
Parker AZ 85344

Ms. Betty Cornelius
Colorado River Indian Tribal Museum
Route 1, Box 23-B
Parker AZ 85344

Ms. Nora Helton
Chairperson
Fort Mojave Tribal Council
500 Merriman Avenue
Needles CA 92363

Mr. Chad Smith
Cultural Resources Management
P.O. Box 599
Mohave Valley AZ 86440

Mr. Michael Jackson
Chairman
Fort Yuma Quechan Tribe
P.O. Box 1899
Yuma AZ 85366-1899

Ms. Pauline Jose
Cultural Preservation Committee
Fort Yuma Quechan Tribe
P.O. Box 1899
Yuma AZ 85366-1899

Mr. Donald R. Antone Sr.
Governor
Gila River Indian Community Council
P.O. Box 97
Sacatone AZ 85247

Ms. Louise Benson
Chairman
Hualapai Tribal Council
P.O. Box 179
Peach Springs AZ 86434

Ms. Loretta Jackson
Department of Cultural Resources
P.O. Box 310
Peach Springs AZ 86434

Ms. Carmen Bradley
Chairman
Kaibab Paiute Tribal Council
HC-65, Box 2
Freedonia AZ 86022

Ms. Brenda Drye
Kaibab Paiute Tribe
HC-65, Box 2
Freedonia AZ 86022

Ms. Connie Von Sleichter
Tribal Archaeologist
Kaibab Paiute Tribe
HC-65, Box 2
Freedonia AZ 86022

Mr. Kelsey Begay
Tribal President
The Navajo Nation
P.O. Box 9000
Window Rock AZ 86515

Mr. Ronald Maldonado
Historic Preservation Office
P.O. Box 4590
Window Rock AZ 86515

Mr. Raymond Stanley
Chairman
San Carlos Tribal Council
P.O. Box 0
San Carlos AZ 85550

Ms. Vivian L. Burdette
Chairperson
Tonto Apache Tribal Council
Tonto Reservation #30
Payson AZ 85541

Mr. Steven F. TeSam
Chairman
P.O. Box 908
Alpine CA 91903-0908

Ms. Nancy Hayden
Director
Yavapai Prescott Indian Tribe
530 East Merritt Street
Prescott AZ 86301-2038

Mr. Ernest Jones
President, Board of Directors
Yavapai Prescott Tribe
530 East Merritt
Prescott, AZ 86301

THE



HOPI TRIBE

Wayne Taylor, Jr.
CHAIRMAN

Elgean-Joshevama
VICE-CHAIRMAN

September 3, 2002

Jim Cherry, Area Manager
Bureau of Reclamation, Yuma Area Office
7301 Calle Agua Salada
Yuma, Arizona 85364

Dear Mr. Cherry,

Thank you for your letter dated August 27, 2002, regarding the enclosed Class I Cultural Resources Inventory Report for the Wellton Mohawk Irrigation and Drainage District Title Transfer Project. As you know from our previous letters on this project dated April 29 and July 3, 2002, the Hopi Tribe claims cultural affiliation to prehistoric cultures in Arizona, and therefore the Hopi Cultural Preservation Office appreciates the Bureau of Reclamation, Yuma Area Office's continuing solicitation of our input and your efforts to address our concerns.

In our April 29th letter we stated that the Hopi Cultural Preservation Office supports identification and avoidance of prehistoric archaeological sites, and that we are not aware of any Hopi Traditional Cultural Properties in this project area. However, in our July 3rd letter, we requested a copy of the Class I Inventory Report by Statistical Research.

We were unable to send a representative to the July meetings, and will be unable to send a representative to the November meeting. However, we have reviewed the *Class I Cultural Resources Inventory for the Transfer of Title to Facilities, Works, and Lands of the Gila Project, Wellton-Mohawk Division, to the Wellton-Mohawk Irrigation and Drainage District, Yuma County, Arizona*, which identifies 155 previously recorded prehistoric sites in the project area. The report also states:

in sum, only a small portion of the lands proposed for transfer have been systematically surveyed. Yet, a relatively large number of sites have been documented in and immediately adjacent to the project area.

We generally support the identification, evaluation and treatment recommendations in the report, specifically continuing tribal consultation, and we request to be informed of the results of the November meeting and whether a Class II sampling inventory is acceptable to the consulting parties.

Should you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office. Thank you again for your consideration.

Respectfully,

Leigh J. Kuwarwiswma, Director
Hopi Cultural Preservation Office

cc: Ms. Pat Hicks (Regional Archaeologist, BOR, Lower Colorado Regional Office, P.O. Box 61470, Boulder City, NV 89006-1470)
Arizona State Historic Preservation Office
Peter Steere, Tohono O'odham Nation
Jeffrey H. Aitschul, Statistical Research



Ak-Chin Him-Dak Eco Museum

Ak-Chin Indian Community

MR OFFICIAL OFFICE COPY		
RECEIVED 11/17/02		
AK-CHIN HIM-DAK ECO MUSEUM		
DATE	INITIALS	COL.
		2080
		2541
CLASSIFICATION		
PROJECT		
CONTROL NO.		
FOLDER I.D.		
KEYWORD		



October 25, 2002

Ms. Pat Hicks
 Regional Archaeologist (LC-2541)
 Bureau of Reclamation
 Lower Colorado Regional Office
 P.O. Box 61470
 Boulder City, NV 89006-1470

Dear Ms. Hicks:

The Ak-Chin Indian Community received the *Class I Cultural Resources Inventory for the Transfer of Title to Facilities, Works, and Lands of the Gila Project, Wellton-Mohawk Division, to the Wellton-Mohawk Irrigation and Drainage District, Yuma County, Arizona* submitted by Statistical Research, Inc. The Ak-Chin Cultural Resources Department reviewed the report. At this time, Ak-Chin Indian Community makes the following comments on the Class I report:

- Concurrence with the majority of the recommendations made by Statistical Research, Inc.
- Recommend significant sites and surrounding areas are removed from the transfer.
- Additional archaeological field surveys are necessary.
- Further consultation with those tribes with traditional cultural places and significant sacred places in the project area, such as the Hia-Ced O'odham District of the Tohono O'odham Nation, the Hia-Ced O'odham Alliance and the additional tribes listed in the report.

Please contact me at (520) 568-1000 or Nancy Nelson, Cultural Resources Manager at (520) 568-1369 if you have any questions.

Sincerely,

Terry O. Enos
 Tribal Council Chairman
 Ak-Chin Indian Community

- cc: Joseph Joaquin, Tohono O'odham Nation Cultural Resources Specialist
 Peter Steere, Tohono O'odham Nation Cultural Affairs Manager
 Elaine Peters, Ak-Chin Him-Dak Eco Museum Director
 Nancy Nelson, Ak-Chin Cultural Resources Manager
 Deborah Baptisto, Ak-Chin Cultural Resources Specialist



TOHONO O'ODHAM NATION

Natural Resources Department
Cultural Affairs

P.O. Box 837 Sells, AZ 85634
Voice: (520) 383-3622 Fax: (520) 383-3377



MR OFFICIAL OFFICE COPY		
RECEIVED 3/3/03		
REPLY DATE		
DATE	INITIALS	CODE
3/4/03	DML	2630
3/13	Abate	2630
3/13	SP	2630
		2632
CLASSIFICATION		
PROJECT		
CONTROL NO.		
FOLDER I.D.		
KEYWORD		

cy 2630

* February 25 2003

Deanna J. Miller, Director
Resource Management Office
USDI – Bureau of Reclamation
Lower Colorado Regional Office
POB 61470
Boulder City, Nevada 89006-1470

Dear Ms. Miller:

The Cultural Affairs Office at the Tohono O'odham nation appreciates receiving your letter of February 20, 2003 with the attached "Proposed Cultural Resources Inventory Strategy for the Wellton-Mohawk Title Transfer Project."

Our office did not receive notification of the September 25, 2003 meeting at the BIA office in Phoenix, so Mr. Joaquin and myself were unable to attend due to previous commitments.

X?

The Cultural Affairs Office concurs with the recommendations made by Statistical Research to:

- (1) Revisit all previously recorded sites in the transferred lands,
- (2) Work with all interested tribes to identify traditional cultural places,
- (3) 100% pedestrian survey of approximately 4000 acres in a swath along the northern and southern margins of the Gila River,
- (4) Sample pedestrian survey of bajada/upper terrace systems with well-developed desert pavement surface adjacent to larger washes flowing into the Gila River, and
- (5) Identification of locations within the transferred lands possessing geomorphic land surfaces that might contain buried cultural deposits.

The goal is to develop a predictive modeling system for prehistoric site locations. This model can then be applied to the remainder of the transfer lands, not surveyed.

The Cultural Affairs office supports this effort and believes that the end result will help to identify thousands of acres of archaeologically sensitive areas. Once, these archaeologically sensitive areas and the locations of traditional cultural places and sacred sites are known, then the Cultural Affairs office of

the Tohono O'odham Nation strongly believes that there areas should be excluded from the land transfer and remain in federal ownership.

Sincerely,



Peter L. Steere
Manager, Cultural Affairs
(Direct) 520-383-1517
psteere@loua.net

cc:

File
Pat Hicks, Archaeologist, Bureau of Land Management
Jim Garrison, Arizona State Historic Preservation Officer
Barnaby Lewis, Gila River Indian Community
Gary Gilbert, Salt River Pima-Maricopa Indian Community
Nancy Nelson, Ak-Chin Indian Community



United States Department of the Interior

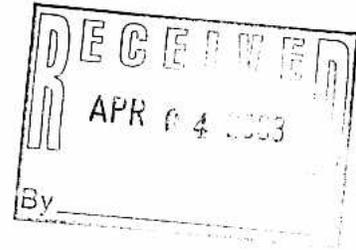
BUREAU OF RECLAMATION

Yuma Area Office
7301 Calle Agua Salada
Yuma, Arizona 85364

IN REPLY REFER TO:

YAO-7300
ENV-9.00

APR - 2 2003



Mr. George J. Fletcher
Director, Water Resources
Bookman-Edmonston
Collier Center, Suite 1750
201 East Washington Street
Phoenix, AZ 85004

Subject: Notice of Intent to Initiate Components of the Cultural Resources Inventory Program for the Wellton-Mohawk Title Transfer, Yuma County, Arizona (LC-AZ-02-06 [P])

Dear Mr. Fletcher:

This letter serves as the Bureau of Reclamation's notice of intent to perform three components of the cultural resources inventory program presented on February 25, 2003, for the Gila Project, Wellton-Mohawk Division Title Transfer. These components are: (1) re-recording previously identified archaeological sites; (2) Class III survey of title transfer lands within 400 meters (m) of the Gila River floodplain; and (3) an inventory of traditional cultural properties.

The Undertaking and the Inventory Program

Reclamation and the Wellton-Mohawk Irrigation and Drainage District (District) are pursuing a title transfer of approximately 59,000 acres consisting of the facilities of the Wellton-Mohawk Division of the Gila Project and lands in or adjacent to the Gila Project. The lands in question lie in the lower Gila River valley in southwestern Arizona. The title transfer is considered an undertaking as defined in Section 106 of the National Historic Preservation Act. A Class I cultural resources inventory was performed by Statistical Research, Inc. (SRI), which identified the existence of historic properties in the title transfer lands. Because the title transfer lands have not been completely surveyed, SRI concluded that it was likely that additional historic properties may exist in the title transfer lands. Accordingly, Reclamation and the District requested SRI to prepare an inventory program to satisfy 36 CFR 800.4(b).1.

This program was presented in a memo dated February 14, 2003, which is provided as Enclosure 1. The program was the subject of a meeting held on February 25, 2003, in Phoenix, Arizona. Attendees included representatives of Reclamation, the District, their consultants, the Arizona State Historic Preservation Office (SHPO), and various tribal groups. Minutes from this meeting are provided in Enclosure 2. The inventory program consists of five components, all of which are limited to title transfer lands. First, previously identified sites will be re-recorded to SHPO standards. Second, traditional cultural properties will be identified. Third, lands immediately adjacent to the Gila River floodplain will be subject to Class III archaeological survey. Fourth, a sampling program based on satellite imagery will be developed and executed for lands located away from the Gila River floodplain. Fifth, a geomorphic map of the floodplain will be constructed that will guide a subsurface trenching program to identify buried sites in the Gila River floodplain.

There was general agreement that the inventory program would satisfy Reclamation's responsibility to identify historic properties. Reclamation and the District agreed to formalize the program in an inventory design that would be circulated to the SHPO and tribal entities for comment. At the meeting some discussion ensued about the merits of beginning the first three components prior to the inventory design. The argument behind this suggestion was that because these components represent the most comprehensive approach to identifying historic properties, there could be no disagreement that these actions satisfy Reclamation's legal obligation. Further, the results of these endeavors might affect the design of the Class II sample and buried sites survey.

The major concern about beginning the inventory process revolved around tribal notification. Some tribal representatives requested that their groups be notified prior to starting fieldwork so that tribal members could visit the project area during the archaeological surveys. Additionally, Reclamation and the District offered to accommodate tribal requests for qualified members to be hired as part of the survey crew.

Inventory Initiation

Upon reflection, Reclamation and the District have agreed that all parties are best served if the re-recording of previously identified sites and the Class III survey are completed and the traditional cultural property survey initiated prior to the design of the Class II sample and buried site survey. This letter, therefore, serves as Reclamation's notice to proceed with these elements of the inventory program. Enclosure 3 presents the methods that will be used to perform these tasks. For Native American tribal governments, this letter also serves as Reclamation's government-to-government notification to tribes that it intends to initiate the re-recording and Class III inventory components of the inventory program. At this time, Reclamation is also requesting that tribal governments and communities identify tribal members that can serve on

archaeological field crews as well as tribal elders and others that may have knowledge of traditional cultural properties and traditional use areas. SRI has been tasked with performing the re-recording of known sites, the Class III inventory, and assisting Reclamation in the collection of information concerning traditional cultural properties and traditional use areas on the parcels of land subject to transfer. Information concerning tribal members qualified to participate on the archaeological survey crews, and elders or other individuals who may have knowledge of traditional cultural properties and traditional use areas located on the parcels of land subject to transfer, can be directed to:

Mr. Jeffrey H. Altschul
 Statistical Research, Inc.
 P.O. Box 31865
 Tucson, AZ 85751-1865
 520-721-4309
jhaltschul@sricrm.com

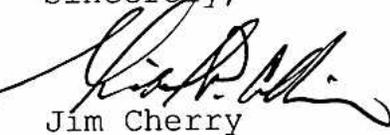
Summary

By way of this letter, Reclamation is notifying the Arizona SHPO and interested tribal organizations that the agency has elected to begin the inventory program presented on February 25, 2003. The program will commence with the re-recording of previously known archaeological sites and the Class III survey of title transfer lands within 400m of the Gila River floodplain. Additionally, Reclamation will initiate the identification of traditional cultural properties. The results of these programs will be incorporated in the Class II sample and buried site inventory design, which will be submitted for review later this summer.

If you have any questions or comments about this letter or Reclamation's cultural resources program, please contact Reclamation Regional Archaeologist, Ms. Pat Hicks, or Reclamation Compliance Archaeologist, Ms. Renee Kolvet. Ms. Hicks can be reached at telephone No. 702-293-8705 or via e-mail at phicks@lc.usbr.gov, and Ms. Kolvet can be reached at telephone No. 702-293-8443 or via e-mail at rkolvet@lc.usbr.gov.

Sincerely,

For


 Jim Cherry
 Area Manager

Enclosures - 3

Minutes from February 25, 2003 Meeting
 Outline of Proposed Inventory Program
 Description of Re-Recording, Class III, and Traditional
 Cultural Property Inventory Methods



United States Department of the Interior

BUREAU OF RECLAMATION

Lower Colorado Regional Office

P.O. Box 61470

Boulder City, NV 89006-1470

IN REPLY REFER TO:

LC-2632
LND-5.00

FEB 20 2003

VIA FACSIMILE ONLY

Ms. Sheila Logan
Bookman-Edmonston
Collier Center, Suite 1750
201 East Washington Street
Phoenix, AZ 85004

Subject: Proposed Cultural Resources Inventory Strategy for the Wellton-Mohawk
Title Transfer

Dear Ms. Logan:

As you are aware, the Yuma Area Office of the Bureau of Reclamation has entered into a Memorandum of Agreement (MOA) with Wellton-Mohawk Irrigation and Drainage District (WMIDD) to transfer approximately 57,000 acres of irrigation facilities, rights-of-way, and appurtenant lands from Federal ownership to WMIDD. The MOA was enacted into law by P.L. 106-221.

A Class I cultural resources inventory (records/literature search) completed by Statistical Research, Inc. (SRI) was recently distributed for your perusal and comments. The Class I report recommends that a sampling strategy, geared to the scale of this project, be developed to identify historic properties. The enclosed inventory strategy prepared by WMIDD's consultants, Bookman-Edmonston, and their sub-contractor SRL, was presented during a meeting at Reclamation's Regional Office in Boulder City on February 14, 2003. To comply with all applicable Federal Historic Preservation laws, the consultants recommend a combination Class II (sample)/Class III (100 percent) cultural resources inventory with limited testing.

Reclamation has reviewed the proposal and feels that a combination strategy is reasonable considering the nature and size of this project. We would appreciate it if you would review the proposal and be prepared to share your comments or concerns during the meeting at the Bureau of Indian Affairs office in Phoenix, scheduled for February 25, 2003. We feel that this proposal is a good starting point for more in-depth discussions and look forward to seeing you next week.

FEB 28 2003 16:52 BUREAU OF RECEPTION 255 0410
2
If you have any questions or comments, please call Ms. Renee Kolvet at 702-293-8443 or Ms. Pat Hicks at 702-293-8705.

Sincerely,



Deanna J. Miller, Director
Resources Management Office

Enclosure

A G E N D A
WMIDD TITLE TRANSFER CULTURAL RESOURCES DISCUSSION
Meeting in Boulder City, NV
Reclamation Mead Building
February 14, 2003 - 1:00 PM

Opening Comments - Rick Strahan

Open Discussion - All:
Discuss and determine the PROPOSAL REGARDING LEVEL AND STRUCTURE OF FIELD REVIEWS that will be discussed as identified on the agenda in the February 25th GOVERNMENT TO GOVERNMENT meeting with the tribes.

Closing Comments - Rick Strahan

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TALKING POINTS

Proposed Cultural Resources Inventory Strategy for the Wellton-Mohawk Title Transfer Project

Introduction

The Yuma Area Office of the Bureau of Reclamation (YAO) has entered into a Memorandum of Agreement (MOA) with Wellton-Mohawk Irrigation and Drainage District (District) to transfer to the District works and facilities, rights of way, lands and other designated lands totaling approximately 57,000 acres. The MOA was enacted into law by P.L. 106-221. Some of the lands proposed for transfer are located in a band along the Gila River within and along the boundary of the District. A Class I cultural resource inventory has been completed; the report identified previously recorded sites and recommended the development of a sampling strategy to inventory historic properties. Pursuant to that recommendation, Statistical Research, Inc. (SRI) proposes a cultural resources inventory strategy suitable to the scale of this large transfer of lands and facilities that complies with applicable federal laws, including the National Historic Preservation Act and the National Environmental Policy Act. Our strategy involves a combination of Class III (100 percent) and Class II (sample) inventories supplemented with limited archaeological testing in the areas of the Gila floodplain that have the potential to contain buried prehistoric cultural deposits.

Inventory and Sampling Strategies

The proposed cultural resources inventory will consist of the following five components:

Re-visit all previously recorded sites in the transferred lands. As required by the Arizona State Historic Preservation Office (SHPO), all previously recorded sites located within lands subject to transfer will be revisited, their current condition noted, the potential threats and disturbances identified. Rock art and geoglyph sites will be recorded to standards set by the SHPO.

100 percent identification of traditional cultural properties. Working with tribes, all traditional cultural properties in the transferred lands will be identified. These properties will be documented and treatment plans developed.

100 percent pedestrian survey of transferred lands in a swath along the northern and southern margins of the Gila River (estimated at 4,000 acres). The goal of the pedestrian survey will be to document cultural resources present within a 400-meter wide band along both sides of the lowest terrace above the Gila River.

Pedestrian survey of a sample of bajada/upper terrace systems with well-developed desert pavement surfaces adjacent to larger washes flowing into the Gila River. Wash and ridge systems are highly correlated with archaeological sites found on stable desert pavements and prehistoric trails systems throughout the project area. We recommend that such areas be identified using a combination of geomorphology (see below) and multispectral Landsat imagery. The advantage to using Landsat data lies in its low cost. Studies using Landsat data to distinguish desert pavement surface from more recent surface have been successful. Use of Landsat will allow us to construct a culturally meaningful sampling strategy, thereby providing a potentially more accurate reflection of prehistoric use of nonriverine environments in the project area. The defined sample areas will then be subjected to 100 percent pedestrian survey and all resources encountered will be fully documented.

Identification of locations within the transferred lands possessing geomorphic land surfaces that might contain buried cultural deposits. This is a multilayered strategy that begins with construction of a geomorphic map of the project area. The map depicting relevant landforms is first constructed using aerial stereopair photos and verified and corrected in the field through backhoe trenching. The ages of geomorphological deposits are then reconstructed through radiocarbon dating. This work will then feed directly into the development of a plan to sample areas with potential for buried cultural deposits using backhoe trenching.

Conclusion

For prehistoric sites, the inventory strategy has the potential to develop a predictive model of site location based on the correlation of site location and land surface type derived from geomorphological and remote sensing data. These data can then be generalized to the remainder of the title transfer lands. By implementing this strategy, SRI believes that Reclamation will meet its Section 106 obligation to identify historic properties in the lands subject to transfer.

WELLTON MOHAWK TITLE TRANSFER MEETING
25 February 2003 9:30 a.m.

Bureau of Indian Affairs
Conference Room
Phoenix, AZ

PARTICIPANTS	ORGANIZATION	PHONE
Mike Collins	USBR – Yuma Area Office	928-343-8123
Jack Simes	USBR – Yuma Area Office	928-343-8334
Rick Strahan	USBR – Yuma Area Office	928-343-8277
Pat Hicks	USBR – Regional Office – Boulder City, NV	702-293-8705
Pat Green	USBR – Regional Office – Boulder City, NV	702-293-8519
Renee Kolvet	USBR – Regional Office – Boulder City, NV	702-293-8443
Joe Smith	USBR – Native American Affairs Office, Phoenix	602-379-3206
Lisa Newcomb	USBR – Native American Affairs Office, Phoenix	602-379-3199
Deborah Saint	USBR – Native American Affairs Office, Phoenix	602-379-3180
Cory Prochaska	Wellton-Mohawk Irrigation & Drainage District	928-785-3351
Gary Langford	Wellton-Mohawk Irrigation & Drainage District	928-785-3351
Charles Slocum	Wellton-Mohawk Irrigation & Drainage District	928-785-3351
Larry Killman	Wellton-Mohawk Irrigation & Drainage District	928-580-6072
Wade Noble	Wellton-Mohawk Irrigation & Drainage District	928-343-9447
Sheila Logan	Navigant Consulting, Inc.	602-528-8063
Sandra Fairchild	Navigant Consulting, Inc.	602-528-5058
Martin Einert	Navigant Consulting, Inc.	702-809-4979
George Fletcher	Navigant Consulting, Inc. (B-E)	602-258-0234
James Garrison	AZ State Historic Preservation Office (SHPO)	605-542-4009
Joanne Medley	AZ State Historic Preservation Office (SHPO)	605-542-4009
Barnaby Lewis	Gila River Indian Council – Cultural Preservation	520-562-3570
Eloise Vincent	Gila River Indian Council – Cultural Preservation	520-562-3570
Jeff Altschul	Statistical Research, Inc.	520-721-4309
Vernon Smith	Quechan Indian Tribe	760-572-0213
Louise Benson	Hualapai Nation	928-769-2216
Carrie Imus	Hualapai Nation	928-769-2216
Deborah Baptisto	Ak-Chin Indian Community	520-568-1368
Gary Gilbert	Salt River Pima-Maricopa Indian Community	480-850-8823

I. Welcoming and Opening Remarks - Mike Collins

II. Introductions – Jack Simes

III. History and current status of the title transfer – Rick Strahan

- In the 1990s, Reclamation, Wellton-Mohawk Irrigation and Drainage District and congress facilitated a transfer of facilities and land from federal ownership to the Wellton-Mohawk Irrigation and Drainage District. Since the law was signed to transfer these lands and facilities, several meetings have taken place between Reclamation, WMIDD and the tribes. A Class I survey was done and provided to participants for comments. Today's meeting will focus on developing an approach for the cultural resources inventory of the parcels subject to transfer.

IV. Discussion of Class I survey – Pat Hicks/Jeff Altschul

V. Field Inventory – Open discussion of level and structure – Pat Hicks/Jeff Altschul

- Field inventory proposal:

LAND/AREA	ACRES	NOTES
Total acres	56,000	
ROWs, facilities, laterals, canals	19,000	These will be subject to a different sort of inventory procedure
Gila River Channel Lands	10,600	
Acquired/Abandoned lands	10,000	
High sensitivity areas	3,900	100% class III inventory
Remaining undistributed lands	12,000	Satellite Remote Sensing (SRS), targeted inventory of high sensitivity land forms, and sample the remaining 12,000 acres

- There are approximately 130 recorded sites and 200 total prehistoric and historic cultural resources identified in the Class I inventory report.
- Most sites were recorded a number of years ago and were poorly documented.
- Reclamation proposed the following:

1. All previously recorded sites located on the parcels to be transferred, be re-visited and re-recorded to current standards and evaluated for potential listing on the National Register of Historic Places (NRHP).
 2. The high sensitivity area within ¼ mile (400m) of the edge of the 1st terrace overlooking the historic floodplain of the Gila River be inventoried to Class III standards and all sites recorded and evaluated for potential listing on the NRHP.
 3. Complete a directed Class II inventory of other parcels outside the high sensitivity area.
 4. Complete a traditional cultural properties (TCPs) survey for the area.
- The ¼ mile high sensitivity area involves +/- 3,900 acres along the Gila that will require a Class III survey: 100% pedestrian inventory.
 - Joe Smith asked about the relationship between this area and the field inventory:
 - There will be some sampling of the parcels to be transferred that are located on the floodplain.
 - Debby Saint asked about the ¼ mile area with regards to the total acreage involved in this transfer (answered above).
 - Consultation with tribes will focus on Native American prehistoric sites and TCPs.
 - Pat Hicks asked about the comfort level with the tribal audience.
 - Larry Killman gave the Wellton-Mohawk perspective:
 - Best time would be spent in the ¼ mile high sensitivity zone;
 - Previously surveyed are shown in orange and brown on the map;
 - Probability pattern - When surveying the flood plain there will be few to no recordable sites, so placing a lot of time and energy in this area is not recommended.
 - Class II inventory will involve some level of in-field survey and sampling of parcels outside the high sensitivity zone.
 - Jeff Altschul discussed a 2-pronged strategy:

- Gila River floodplain: use Land Sat photo analysis to identify landforms and cultural deposits that may be buried or highly disturbed.
 - Follow up with field reconnaissance and mechanical trenching to confirm the results of the Land Sat photo analysis and to develop an understanding of the alluvial chronology.
 - Assess the integrity of any cultural resources that might be present.

- Jeff Altschul gave an overview of the SRS work: An SRS study would be completed for areas outside the high sensitivity zone and off the Gila River floodplain (i.e., adjacent bajadas and uplands). A review of these images and maps, should allow for identification of landforms that have a high probability for having sites on them. This information would be ground-truthed and a Class II inventory developed.
 - Gila valley has four major land forms
 - Collect the satellite imagery, classify it, and analyze it

- Pat Hicks noted that TCP surveys could contribute to all components of the inventory

- Joanne Medley asked Jeff Altschul why sites couldn't be found in the flood plain---Normally sites are buried, not visible on surface; sites on floodplain farther up river are being discovered during trenching operations.

- Barnaby Lewis asked for more information SRS:
 - He asked about the satellite remote sensing and why it hasn't been used in the Southwest
 - Pat Hicks explained that it has been used before, and Jeff Altschul expounded on it. It is similar to aerial photography
 - Barnaby Lewis requested more information on this history
 - Navigant cited a website where such information could be obtained---this information will be relayed to Mr. Lewis

- Renee Kolvet asked if it would pick up Native American trails?
 - Jeff Altschul noted resolution of photos probably isn't good enough to do this, so SRI proposal is focused on identification of landforms.
 - Pat Hicks noted the real value in SRS is identifying land forms

- Pat Green asked Jeff Altschul about using other map sources to compliment SRS:
 - Jeff Altschul explained the relationship and Pat Hicks expounded on the tools involved

- Joanne Medley asked about trail identification:
 - Pat Green explained the difficulty involved but noted parts of trails may be visible;
 - It still requires overlaying various maps; and
 - Use of these tools' findings requires in-field verification.
- Pat Hicks summarized the tools and techniques.
- Pat Green noted that the SRS when coupled with Jeff Altschul's findings for the Class I survey, should lead to identification of other areas in need of inventory.
- Joanne Medley asked what would be the ground truthing?
 - Jeff Altschul responded with field verification of the findings of the SRS studies.
- Pat Hicks also stressed field verification and then asked about the comfort level from the audience.
- Larry Killman stated Wellton-Mohawk's view that the Class II inventory would be a sample of 10-14k acres.
- Wellton-Mohawk endorsed the proposed approach that Jeff Altschul and Pat Hicks presented.
- Pat Green noted that some of these areas would be revisited.
- Joanne Medley added the TCP surveys.
- Pat Hicks clarified the proposal.
- Sheila Logan asked about the size of the proposal package.
- Pat Green noted 60 days would be needed for review and comment by tribes.
- Joe Smith asked about the time frame involved:
 - Within 30 days the package could be sent out
 - Pat Green noted that they were working to finalize the time frame

Louise Benson of the Hualapai Nation noted the Hualapai had little interest in the title transfer because of the great distance of Hualapai territory from the Gila River Valley. She felt there was no need for further participation by the Hualapai in these consultations. She and Carrie Imus then left the meeting.

BREAK - 11:00 a.m.

- The meeting was turned back over to Jeff Altschul who reviewed the proposal package and the review/comments
- Jack Simes asked the audience about their thoughts, wanting to ensure everyone will have an opportunity to review the proposal package and comment accordingly:
 - These will be sent out by certified mail to all interested parties.
- Pat asked if known site relocation and documentation, and the Class III inventory of the high sensitivity zone could be started before the Class II inventory plan was completed:
 - The consensus of all present was that yes, this could be done
- Pat Green also asked the audience how many reports? (Each inventory component to have its own report, or just one report?):
 - Pat Hicks felt only one report was necessary and should incorporate findings of both the Class III and Class II inventories. Pat Green agreed.
- Pat Green asked SHPO about submitting the inventory proposal to SHPO and tribes for concurrent review:
 - James Garrison noted SHPO is required to respond in 30 days from receipt of correspondence; he agreed to review proposal to be submitted 30 days after it is sent to tribes.
- Pat Green agreed regarding the time difference in the review:
 - He asked Jeff Altschul what the inventory proposal package would look like.
- Debby Saint noted that the individuals who would assess the work would be the tribes.
- Pat Green reviewed the time frames for the review.
- James Garrison recommended targeting high probability areas and focusing inventory on them.
- Back and forth discussions on the review time frame.
- Jeff Altschul will prepare a 25 – 35 page document outlining the various components of the Class II inventory and describing the method (SRS, etc.) that would be used.

- Pat Green asked Vernon Smith what his views were on this.
 - Vernon Smith replied that they have no problem with this approach.
 - He requested that the Quechan be notified when it comes time for the TCP inventories. They would like to send a representative out for that activity.
 - They have no problem with the time frames – so far things seem to be going along well.

- Pat Green asked Jeff Altschul about the document time frame:
 - The tribes have 60 days for review and comment;
 - SHPO has 30 days for review and comment;
 - They cannot be sent out concurrently.

- A discussion ensued regarding the time frame for review
 - George Fletcher, Larry Killman, Jack Simes, and others participated in this discussion.

- Pat Green questioned if the proposal is in part or as a whole under review.
 - Joanne Medley was asking this question earlier also.

- Jeff Altschul noted that any TCP input would be appreciated.

- Rick Strahan noted we would start more (surveys) than less?

- Pat Green asked if a summary letter of the approach could be done

- A discussion ensued involving Debbie Saint, Joanne Medley, and Charles Slocum . Charles Slocum noted that the addressed time frames are based around this action.

- Debbie Saint asked who we need to get permission from to move forward?

- Jim Garrison commented on tribal input, especially for those tribes not here – for them to have 60 days to review.

- Debbie Saint proposed an area manager letter on the method be sent out to all parties, and get the class III survey going.

- Jeff Altschul noted most federal agencies sponsor site tours after inventory is done.

- Jack Simes noted there were two recommendations:
 - 1) Debby Saint’s suggestion for a letter from the area manager.
 - 2) The time frames for review and comments.
 - Adding both are tied to Jeff Altschul’s proposal

- Jeff Altschul noted procedural concerns accommodating tribal participation
- Debby Saint: Do we want to get an early start?

VI. Summary of the Day's Discussions – Jack Simes

- Process for proceeding with Class III survey will be determined
 - Step 1: This meeting summary will be sent out to all participants and to all those not in attendance for this meeting.
 - a. Include Jeff's summary of inventory proposal
 - b. Request comments back from recipients
 - Step 2: A proposal for conducting the Class II sampling inventory will be prepared and distributed to all interested parties
 - a. SHPO will be sent a cc of the technical proposal package that is sent to tribes with a note stating they will receive their copy in 30 days for their 30 day review
 - Step 3: Proposal will be revised in response to comments and a final document prepared
 - Step 4: Proceed with first phase of the Class II inventory

Footnote: In reference to Remote Sensing Technology, please see the website:
<http://rst.gsfc.nasa.gov/>

ENCLOSURE 3

METHODS

This attachment presents the methods that will be used to conduct archaeological and ethnographic fieldwork. The methods are presented by task: re-recording archaeological sites; Class III survey, and traditional cultural properties survey.

Re-Recording Archaeological Sites

Forty-two archaeological sites have previously been recorded on title transfer lands. Attempts will be made to revisit each site. Because some sites were recorded more than 40 years ago, we anticipate that several sites will have been misplotted. Some sites located on title transfer lands may be found to be located off these lands, whereas others plotted off of transfer lands may actually be situated on them. To ensure that we have visited all previously recorded sites subject to the transfer we will revisit the 42 previously recorded sites as well as all previously recorded sites within 100 m of title transfer lands to verify their location.

Each previously recorded site will be re-recorded using current Arizona State site-definition criteria. These criteria stipulate that an archaeological site must contain physical remains of past human activity which is at least 50 years old. Additionally, sites must contain at least one of the following: (1) 30 or more artifacts of a single material class (i.e., 30 sherds, 30 pieces of lithic debitage, or 30 tin cans) within an area 15 m in diameter, except when all pieces appear to originate from a single source (i.e., a ceramic vessel, a lithic core, or a glass bottle); (2) 20 or more artifacts of at least 2 material classes (i.e., sherds, ground stone, nails, glass) within an area 15 m in diameter; (3) one or more archaeological features in association with artifacts; (4) two or more associated archaeological features at the field supervisor's discretion, isolated, nonlinear features lacking artifacts, such as rock art, rock piles, mine shafts or prospecting pits, may be recorded as isolates. By definition, an "isolated feature" must be more than 100 m from the closest cultural feature.

Site-recording procedures will be comprehensive and identical for all cultural resources encountered. Information recorded in the field for all sites included the site's UTM location using Trimble GeoExplorer II handheld global positioning system (GPS)

units, with postprocessing differential correction applied. Also recorded will be the site's geomorphological and ecological setting; evidence of natural and human disturbances, and assessment of whether buried cultural deposits might be present; site size; description of any features; discussion of artifact classes present and estimates of their number and density across the site; and assessment of the site's chronological, functional, and cultural context. The site information recorded will be later transferred to ASM site forms at SRI's Tucson office.

Sketch maps of each cultural site and its environs will be created in the field using a compass-and-tape method. Distances were determined with metric (for prehistoric) or English-ruled (for historical-period) tapes. In the case of linear features (trails), a continuous series of GPS locations will be recorded by walking its entire length. The site maps will include data on site size, spatial relationships between features and any artifact concentrations, point locations of important artifacts, prominent geographical features, and any disturbances that might have affected the integrity of the site. The scale used will vary according to the size of the site. In addition to the site description and map, a photographic record will be created for all sites. Color slides and black-and-white photographs will be taken of the general site environs and all significant features and artifact concentrations.

For rock art sites, crew members will canvass the immediate area to ensure that all panels are identified. Panels on the same outcrop will be recorded as a set. For each panel a field form will be filled out that records data on design elements, degrees of patination, natural and cultural deterioration, and topographic situation. Each panel will be sketched, and the locations of the various panels on the outcrop noted. Digital and 35-mm color and black-and-white photographs will be taken of each panel.

Geoglyphs will be recorded using a modified rock art field form. Similar observations regarding patination, degree of deterioration, topographic setting, and design will be made. In cases where the symbol is best viewed from the sky, a hot-air balloon will be used to photograph the feature.

Every site will be marked with a permanent datum, consisting of a 2-foot piece of rebar with an aluminum cap stamped with the ASM number. After completion of fieldwork, each trail segment

classified as a site also will be marked with a datum. In this case, each of the two ends of the trail will be staked.

Cultural resources not meeting ASM site criteria will be recorded as isolates. A brief assessment of each isolate will be made in the field, and each will be assigned a unique field number. Cultural composition and ecological setting of each isolate will be described, and its UTM coordinates will be obtained using the GPS unit.

Class III Survey

The Class III survey will be performed by a four-person crew headed by a project director. Prior to the survey, we will identify the UTM coordinates of all parcels of transfer lands within 400 m of the Gila River floodplain. Upon reaching a survey area, the project director will verify the crew's position with a GPS unit. The survey crew will then cover the parcel by walking linear transects at intervals of 15 m or less. Upon finding an artifact or cultural feature, the crew will stop, mark their positions, and converge on the identified location. A concerted search of the surrounding area will then be performed, and a decision about whether to designate the location an archaeological site or isolate will be made. Recording methods will follow those described above. Upon completion of the parcel, the survey crew will regroup at the vehicle and proceed to the next parcel.

Traditional Cultural Property Inventory

The TCP inventory will begin with Mr. Scott O'Mack, SRI's ethnographer, contacting the cultural preservation office of each group. The cultural preservation office will suggest elders and other tribal members that might have information on TCPs. Interviews will be scheduled with each person who agrees to participate in the inventory. Interviews will be conducted in the language chosen by the interviewee; when necessary, SRI will provide for an interpreter.

A list of questions will be prepared by Mr. O'Mack prior to the interviews and circulated to the cultural preservation committee of each group. These questions will be designed to structure the interview, which will be kept at an informal tone. We expect that with some of the interviewees, all the questions on the list will be asked, more or less in order. With others, the questions will be answered, but not in the order presented. Still others may only answer some of the questions, either

because a question did not seem appropriate in the context of other information provided by the interviewee, or because the interviewee does not feel qualified to answer.

The interviews may be followed up with field visits. These visits may be to specific sites or to orient the interviewee to the general project area.

Tape recordings will be made of the interviews when the interviewees consent to be recorded and as circumstances allow. To preserve the privacy of the interviewees, their names will not be included in the confidential report issued as part of this project.



AHAMAKAV CULTURAL SOCIETY

Fort Mojave Indian Tribe

P.O. 5990 MOHAVE VALLEY, AZ 86440

(928) 768-4475
OFFICIAL FILE COPY - YAO

*WTR-400-Irrigation
District WNI100*

RECEIVED
APR 22 2003

ACTION CODE

REPLY DATE

DATE ACTION TAKEN

DATE	INITIALS	CODE
4/28	BJS	7100
4/28	BJS	7100
		7100
		7100
		7100
		7100
		7100
		7100
		7100

COPY

April 16, 2003

Jim Cherry, Area Manager
Bureau of Reclamation
Yuma Area Office
7301 Calle Agua Salada
Yuma, AZ 85364

RE: Proposed Cultural Resource Inventory Program for the
Wellton-Mohawk Title Transfer

Att.: Renee Kolvet, Compliance Archaeologist

Dear Mr. Cherry:

The AhaMakav Cultural Society, which is the Historic and Cultural Preservation Office of the Fort Mojave Tribe, has received and reviewed your April 2 letter and the accompanying documents, and we have the following comments:

1.) We agree in general to the proposed inventory of the area of potential effect, with complete coverage of the 400 meter wide area adjacent to the Gila River floodplain. We look forward to receiving and reviewing the proposed methodology for inventory of lands further from the River.

2.) In Enclosure 3, Methods, third paragraph, Arizona State site-definition criteria are given. These are actually Arizona State Museum criteria for archeological site definition, and while the fifty year guideline usually applies, it must be considered that there are properties of less than fifty years in age that are eligible for (and already on) the National Register of Historic Places, such as missile silos, Taliesin West, and any Traditional Cultural Property a Tribe considers important. We possibly will object to designation of sites with less than thirty artifacts of one class, and less than twenty artifacts of at least two types, as isolated occurrences. Our and many other Tribes' threshold for site status is ten artifacts of one type, and one artifact each of three types (such as sherd, flake, groundstone). Eligibility and effect would have in this project to be determined by a testing program. Of greatest concern to us is the proposed designation of individual rock art boulders as isolated occurrences. We have successfully

Classification
Priority
Custodian
Accession
Inventory
2000990
2901

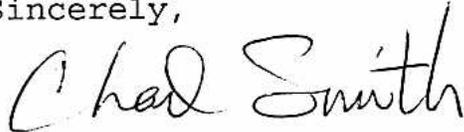
ENV-3.00

compelled the Arizona Department of Transportation to record such phenomena as archeological sites. Such locations are obviously traditional cultural properties and eligible for protection under the National Historic Preservation Act (NHPA) and are considered sacred objects and objects of cultural patrimony under the Native American Graves Protection and Repatriation Act (NAGPRA). We do not expect to see trail segments recorded as isolates either.

3.) We do not accept the validity or veracity of many statements presented by non-Indian anthropologists in earlier ethnographic and archeological studies about Tribes, especially the "Patayan" concept. We will prepare a set of questions which we will ask to knowledgeable Mojaves in regard to the undertaking area of potential effect, and present those results in our ethnographic study, whether in concert with Statistical Research, or as a subcontractor.

If you have any questions, call us at (928)-768-4475.

Sincerely,

A handwritten signature in cursive script that reads "Chad Smith". The signature is written in dark ink and is positioned below the word "Sincerely,".

Chad Smith, Tribal Archeologist,
Cultural Resource Manager

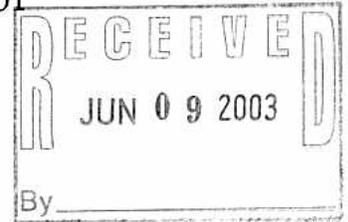
xc: Elda Butler, Director, AhaMakav Cultural Society
Nora McDowell, Tribal Chairperson



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF RECLAMATION
Yuma Area Office
7301 Calle Agua Salada
Yuma, Arizona 85364



YAO-7300
ENV-3.00

JUN - 5 2003

CERTIFIED RETURN RECEIPT REQUESTED (7001 0360 0001 2892 8597)

Mr. Chad Smith
Tribal Archaeologist
Ahamakav Cultural Society
Fort Mojave Indian Tribe
P.O. Box 5990
Mohave Valley, AZ 86440

Subject: Response to Letter Dated April 16, 2003, Concerning
the Proposed Cultural Resources Inventory Program for
the Wellton-Mohawk Title Transfer (LC-AZ-02-06 [P])

Dear Mr. Smith:

The Bureau of Reclamation's Lower Colorado Regional Office (Reclamation) recently issued an Archaeological Resources Protection Act (ARPA) permit to Statistical Research, Inc. (SRI), for the purposes of relocating and re-evaluating previously identified archaeological sites thought to be situated on Reclamation withdrawn and acquired lands that are a part of the Wellton-Mohawk title transfer, and to conduct a Class III inventory of Reclamation lands located one quarter mile from the edge of the first terrace overlooking the Gila River floodplain. In response to one of the concerns expressed in Item 2 of your letter of April 16, 2003, a stipulation was included in SRI's ARPA permit requiring them to record trail segments and isolated boulders with rock art elements on them, as sites, rather than isolated occurrences.

Item 2 in your letter also recommended that Reclamation follow more stringent criteria for archaeological site designation than those specified in Arizona State Museum (ASM) guidelines. Reclamation has considered your recommendation and determined it is appropriate to use ASM site designation criteria and guidance during the cultural resource inventories that will be conducted for the Wellton-Mohawk title transfer. Reclamation regularly sponsors projects located on Federal, state, tribal, and private lands in Arizona, California, and Nevada. In order to ensure

data collected during Reclamation sponsored projects is consistent with previous work conducted in an area, it is Reclamation's policy to require that archaeological contractors employ the site designation criteria specified by the agency or tribe on whose lands a project is located, or in the absence of these, to defer to the use of the standards set by the state. When a project involves solely Reclamation withdrawn and/or acquired lands, Reclamation defers to the use of the state standards. Based on past experience, ASM guidance with respect to what does and does not constitute a "site" is sufficiently flexible enough to allow field personnel to make judgment calls and record resources as "sites" when they encounter artifact scatters or isolated features, that do not meet the criteria for site designation, but perhaps warrant more intensive examination and recording (e.g., a cache of eight [8] Clovis points, or a small spatially discrete lithic scatter containing only eighteen [18] items, twelve [12] of which are formal scraping tools). Reclamation regularly requires archaeological contractors to prepare tables for inclusion in inventory reports that include locational and descriptive information for all resources identified as isolated occurrences. These tables are carefully examined during the report review process to determine if any of these resources would be better termed "sites."

In reaching a decision as to whether or not to use the more stringent site designation criteria you recommend during the Wellton-Mohawk inventories, Reclamation also had to consider the effect this might have on the timelines that have been established for the title transfer, and the cost of completing the cultural resources compliance. Given the large amount of acreage that will need to be inventoried at the Class III and Class II levels, and the proposed schedule for completing work on the title transfer environmental analyses, Reclamation determined use of more stringent site designation criteria could result in a significant increase the number of sites that would have to be documented and reported on. Were the number of anticipated sites to increase significantly, the contractor would be forced to increase the amount time allocated to the field work and reporting phases of the project, and/or increase the number of personnel assigned to work on the project, in order to meet scheduled deadlines. Using the more stringent criteria for site designation you recommend could thus lead to a substantial increase in the cost of the inventory.

With reference to Item 3 in your letter, the details of the traditional cultural property (TCP) survey that SRI will conduct have not been worked out. I encourage you to contact Mr. Jeff Altschul at SRI to discuss concerns you may have with respect to how the TCP survey will be conducted, what questions might be asked, etc. It may interest you to know SRI has indicated its willingness to hire qualified tribal members to work on the inventory crews. If you are aware of any tribal members who might be interested in working on the inventory crews, I encourage you to contact Mr. Altschul or Mr. Matthew Hill directly to participate in the inventory. SRI's telephone No. is 928-721-4309.

If you have any other questions or concerns about the cultural resources compliance effort for the Wellton-Mohawk title transfer, please direct them to Reclamation's Regional Archaeologist, Ms. Pat Hicks at 702-293-8705, or by e-mail at phicks@lc.usbr.gov, or to Reclamation's Compliance Archaeologist, Ms. Renee Kolvet at 702-293-8443 or via e-mail at rkolvet@lc.usbr.gov.

Sincerely,

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