
APPENDIX G

APPENDIX G

Cultural Resources Correspondence

This appendix contains copies of the following correspondence regarding cultural resources:

- Letter from Reclamation to SHPO, dated February 22, 2002.
- Letter from SHPO to Reclamation, dated September 27, 2002.
- Letter from SHPO to Reclamation, dated April 15, 2003.
- Letter from SHPO to the Advisory Council, dated June 3, 2003.
- Letter from Reclamation to SHPO, dated December 17, 2003.
- Letter from SHPO to Reclamation, dated January 29, 2004.
- Letter from Reclamation to SHPO, dated April 30, 2004.
- Letter from Reclamation to SHPO, dated May 7, 2004.
- Letter from Reclamation to SHPO, dated April 14, 2005.
- Letter from SHPO to Reclamation, dated April 29, 2005.
- Letter from Reclamation to SHPO, dated May 20, 2005.
- Letter from SHPO to Reclamation, dated June 22, 2005.
- Letter from Reclamation to SHPO, dated June 30, 2005.
- Letter from SHPO to Reclamation, dated August 1, 2005.
- Letter from Reclamation to SHPO, dated August 26, 2005.
- Letter from Reclamation to SHPO, dated October 26, 2005.
- Letter from SHPO to Reclamation, dated November 28, 2005.
- Letter from the Advisory Council to Reclamation, dated December 1, 2005.
- Letter from Reclamation to SHPO, dated January 9, 2006.
- Letter from SHPO to Reclamation, dated February 13, 2006.
- Letter from Reclamation to SHPO, dated March 15, 2006.
- Letter from Reclamation to SHPO, dated March 17, 2006.
- Letter from Reclamation to SHPO, dated March 29, 2006.
- Letter from Reclamation to SHPO, dated April 13, 2006.
- Letter from SHPO to Reclamation, dated April 28, 2006.
- Letter from SHPO to Reclamation, dated May 1, 2006.
- Letter from Reclamation to SHPO, dated May 17, 2006.
- Letter from SHPO to Reclamation, dated July 3, 2006.
- Letter from the Advisory Council to Reclamation, dated August 23, 2006.

FEB 22 2002

YAO-7210
ENV-7.00

Ms. Jo Anne Miller
Compliance Specialist
Archaeologist
State Historic Preservation
Office
Arizona State Parks
1300 West Washington
Phoenix AZ 85007

Subject: Section 106, National Historic Preservation Act -
Consultation for the Wellton-Mohawk Title Transfer
Project (Project)

Dear Ms. Miller:

This letter is intended to keep you informed of progress on the subject Project as promised in a meeting on December 6, 2001, attended by Reclamation staff (Andrea Campbell, Rick Strahan, and Joe Liebhauser); Larry Killman (Wellton-Mohawk Irrigation and Drainage District); and you and William Collins, Historian, State Historic Preservation Office (SHPO). The purpose of our meeting was to initiate consultation with the SHPO, as required by Section 106, National Historic Preservation Act, and to brief you on the details of the Project.

Since December, our National Environmental Policy Act (NEPA) review contractor, Navigant Consulting, Inc., has engaged Statistical Research, Inc. (SRI), for the purpose of conducting the cultural, historical, and archaeological research necessary for impacts analysis. SRI is presently in the initial phase of a Class I literature review, which shall satisfy the first step in the Section 106 compliance process. In addition, SRI is assisting Mr. Jack Simes, Reclamation's Native American Affairs Coordinator at the Yuma Area Office, in initiating a dialogue with Indian Tribes who are stakeholders in the area of potential Project effect. If progress continues at the present pace, we expect to submit the results of the Class I review to SHPO this spring.

If you have any questions or comments regarding the Project, please do not hesitate to contact Ms. Andrea Campbell at 928-343-8237 at your convenience.

We look forward to our continued cooperation in completing Section 106 compliance for this Project.

Sincerely,

MICHAEL COLLINS

Michael P. Collins
Director
Resource Management Office

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

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

Regional Director, Boulder City NV, Attention: LC-2500

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7100

7120 Kirkland
7210 DeSantiago
7300 Simes

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WTR-4.0 Irrigation

District
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In reply refer to: SHPO-2002-402
General Comments

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| Classification | Project | Control No. |
| Form ID | Keyword | |

September 27, 2002

ORIGINAL

Michael P. Collins
Director, Resource Management Office
Bureau of Reclamation
Yuma Area Office
P. O. Box D
Yuma, AZ 85366

Re: Wellton-Mohawk Title Transfer Project (LC-AZ-02-06[P]); BR
SHPO-2002-402 (12427)

Dear Mr. Collins:

Thank you for continuing to consult with our office regarding the Wellton-Mohawk Title Transfer Project. William Collins, Deputy State Historic Preservation Officer and I have reviewed the Class I Cultural Inventory Report prepared by Statistical Research, Inc. and have the following comments pursuant to 36 CFR 800:

The summary information about the project in chapter 2 that provides a history of the Yuma Project, the Gila Project, and Wellton-Mohawk Irrigation and Drainage District does a good job in revealing that the properties associated with this undertaking have historical significance. Chapter 3, however, is constrained by a limited consideration of topics that apply to the properties. The three topics described related to the historic resources—Native American and European-American contact and interaction, transportation, and historical-period land use—fail to consider adequately specific areas of research that may be of interest to historians of Arizona in the 20th century. Most of the historic contexts described in chapter 3 relate to archaeological properties co-existent with the historic resources of the Wellton-Mohawk irrigation infrastructure and are concerned with anthropological questions that have no connection with the irrigation district and the farms and communities it has spawned.

Many of the questions related to the project and its properties are archaeological in nature, such as those concerning possible remains of early worker construction camps and evidence of earlier irrigation undertakings. Only one question, the one related to the economic and social impacts of the system's construction, addresses any issue relevant to the people currently living around and with the system, or might connect the Wellton-Mohawk project with the larger story of the development of Arizona.

The entire conception of significance laid out in chapter 3 appears to presume that the only significance that can be associated with these properties is the information they may yield to investigators. There are two points to consider. The first is that where the report



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302 S. 4th St.
Phoenix, AZ 85004

Letter to Mr. Collins (Wellton-Mohawk Title Transfer Project (LC-AZ-02-06[P])
(SHPO-2002-402)

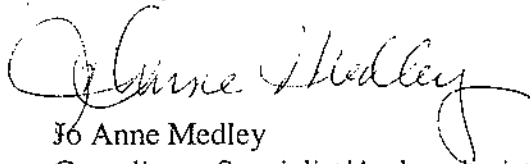
September 27, 2002

Page 2

describes the sort of assessments needed (pp. 93-94), the only professional expertise considered useful are archaeologists, architectural historians, or historical architects. It has apparently not been considered that an historian may have a different perspective that could be of value. The second point is that the description of contexts as a set of research questions can lead only to a consideration of National Register eligibility under criterion D. Criteria A, B, and C and the ability of these properties to convey the significance of the Wellton-Mohawk project has been shortchanged. We recommend that as further work is done related to this undertaking, more research by qualified professionals be undertaken so that the Wellton-Mohawk Irrigation and Drainage District can be properly evaluated under criteria A, B, and C. The information gathered would be of value in mitigating any adverse effects resulting from the transfer of ownership out of federal jurisdiction.

We would be pleased to attend a meeting Reclamation has planned for early November to discuss inventorying of cultural resources. However, you should know that because of Arizona's budget crisis, state agency employees may not travel out of state. As of today, we have no meetings scheduled during November other than routine staff meetings. Please let us know when and where the meeting will be held.

Sincerely,



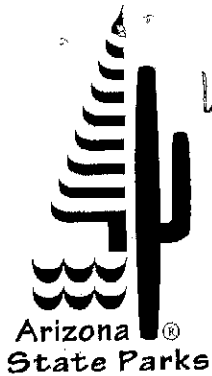
Jo Anne Medley
Compliance Specialist/Archaeologist
State Historic Preservation Office

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

"Managing and conserving natural, cultural, and recreational resources"

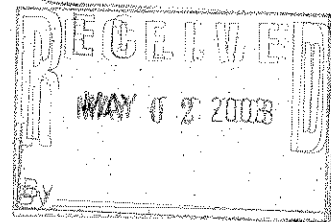
WTR-4.00 - irrigation district WTRID

General comments



April 15, 2003

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



Re: Notice of Intent to Initiate Components of the Cultural Resources Inventory Program for the Wellton-Mohawk Title Transfer (LC-AZ-02-06 [P]); YAO-7300 ENV-9.00, BR SHPO-2002-402 (15022)

Dear Mr. Cherry:

Thank you for informing us of Reclamation's notice of intent to perform three components of the cultural resources inventory program as was discussed during the February 15, 2003 meeting in Phoenix.

For your information, we received six duplicate packets of the notice of intent: two addressed to Jim Garrison, one to Bill Collins, two to Jo Anne Medley, and one to the Chairman of the San Carlos Apache Tribal Council. We mailed the San Carlos Tribal Council packet to Mr. Stanley. In future mailings to our office, please send only one packet, which can be addressed to Mr. Garrison.

We appreciate your continuing cooperation with our office in complying with the requirements of historic preservation. We look forward to continuing to consult on this undertaking. Please contact me at (602) 542-7142 or by email at jmedley@pr.state.az.us if you have any questions or concerns.

Sincerely,

Handwritten signature of Jo Anne Medley

Jo Anne Medley
Compliance Specialist/Archaeologist
State Historic Preservation Office

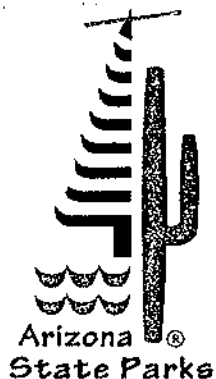
- Janet Napolitano Governor
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John U. Hays Yarnell
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Walter D. Armer, Jr. Benson
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Kenneth E. Travous Executive Director

Arizona State Parks
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Table with columns: DATE, INITIALS, CODE. Includes rows for 4/16, 4/28, 7200, 720. Includes handwritten file number 3500927 and 2901.

Re: control # 3500 828

"Managing and conserving natural, cultural, and recreational resources"



June 3, 2003

Carol Legard
Advisory Council on Historic Preservation
12136 West Bayaud Avenue, Suite 330
Lakewood, CO 80226

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Dear Ms. Legard:


Within the last year or so, there has been increasing interest in Arizona in placing preservation or conservation easements on archaeological properties. Recently, a legal representative of the Wellton-Mohawk Irrigation and Drainage District contacted our office regarding the feasibility of placing archaeological preservation easements on properties located on large parcels of land (thousands of acres) that would be involved in a proposed title transfer of facilities and lands to Wellton-Mohawk. The number and type of archaeological and other cultural resources that could be present on those parcels is not yet known – cultural resources surveys are underway at this time.

We have limited experience with archaeological covenants and easements, especially involving such large tracts of land, and, potentially, large numbers of archaeological resources. Although this request could be seen as premature in that the identification effort for this project is in a very early stage, we need a better understanding of a treatment measure that is not often used for archaeological properties in our State. We are hopeful that the Advisory Council's experience at the national level can help us provide better information and guidance on appropriate use of easements.

We would like your guidance on what types of situations/conditions might be requisites for archaeological preservation covenants/easements, ideal ways by which easements can be implemented, and on what types of entities could hold easements. Examples of successful easements/covenants and preservation/management/monitoring plans over the long-term would also be helpful.

Thank you in advance for your help. If you have any questions, please contact me at (602) 542-7142 or by email at jmedley@pr.state.az.us.

Sincerely,


Jo Anne Medley
Compliance Specialist/Archaeologist
State Historic Preservation Office

Cc: Pat Hicks, Archaeologist, Bureau of Reclamation, Boulder City, NV

Janet Napolitano
Governor

State Parks
Board Members

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Director's Office Fax:
602.542.4188

June 12, 2003

Hi Lorri/Rick:

Here are copies of a letter from the AZ State Historic Preservation Office (SHPO) to the Advisory Council on Historic Preservation (Council) requesting information and guidance on the use of preservation easements as a means of resolving the adverse effects to archaeological sites stemming from a project. As noted in the letter, this request was precipitated by a call from Wellton-Mohawk's legal counsel asking for information and a meeting with SHPO staff to discuss potential use of preservation easements as a mitigation measure for the Title Transfer.

Joanne called me a while back to let me know she was requesting information and guidance on the use of preservation easements from Council. At that time I asked her to cc Wellton-Mohawk in on the letter. Joanne noted it was the SHPO's policy to consult directly with the lead Federal agency for a project, not with a project proponent, so she was not going to cc to Wellton. In keeping with this policy, when Wellton-Mohawk's legal counsel called, she refused to meet with them without someone from Reclamation being there.

If you have any questions, give me a buzz at (702) 293-8705.

Pat Nicks



IN REPLY REFER TO:

LC-2630
ENV-3.00

United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470

DEC 17 2003

Mr. James Garrison
State Historic Preservation Officer
Arizona State Parks
1300 West Washington
Phoenix, AZ 85007

Subject: Request for Formal Comments on the Draft Archaeological Sample Survey Design
for the Wellton-Mohawk Title Transfer (LC-AZ-02-06 [P])

Dear Mr. Garrison:

On October 22, 2003, you were sent a draft of the sampling design for the Class II inventory of lands involved in the Wellton-Mohawk title transfer prepared by Statistical Research, Inc. (SRI), for your informal review. The Class III inventory of the parcel areas most likely to contain sites was completed this past summer. Nearly 4,000 acres were inventoried to Class III standards, and 110 sites were documented, 39 of which had been previously recorded by other researchers.

The Class II sample survey will complete the inventory effort for prehistoric archaeological sites on the transfer parcels. As indicated in the draft sampling design, SRI is recommending the Bureau of Reclamation (Reclamation) inventory to Class III standards an additional 1,157 acres encompassing those land classes away from the Gila River floodplain most likely to contain prehistoric archaeological sites. The draft sampling design also lays out a strategy for identifying buried landforms suitable for habitation and a program for testing with mechanized equipment to determine if archaeological sites are present.

The draft Class II sampling design was sent to tribes for their review and comment on October 22, 2003. Tribes were asked to submit their formal comments on the draft sampling design to Reclamation by December 22, 2003. To date, Reclamation has received written comments only from the Yavapai Prescott Indian Tribe and the Fort McDowell Mohave-Apache Indian Community. I am enclosing copies of their correspondence for your information. On November 19, 2003, Reclamation held a meeting to go over the sampling design with tribal representatives and answer any questions they might have. Several concerns were advanced by meeting participants, including the number of additional acres to be surveyed as a part of the Class II inventory and the number and distribution of the additional survey parcels. Reclamation is planning to hold another meeting in January 2004 to discuss and resolve concerns about the Class II survey design that have been raised by the various consulting parties. Additional information concerning this meeting will be forwarded to you when it is available.

Please review the copy of the draft sample survey design you were sent in October. I would appreciate receiving your comments on this document by December 22, 2003. Please direct your comments to Reclamation Regional Archaeologist, Ms. Pat Hicks. If you have any questions concerning the sampling design, please feel free to call Ms. Hicks at 702-293-8705.

Sincerely,

Amelia Pite
For Deanna J. Miller, Director
Resources Management Office

Enclosure

cc: Ms. Sheila Logan, P.E.
Project Manager
Bookman-Edmonston Division
GEI Consultants, Inc.
201 East Washington Street, Suite 1750
Phoenix, AZ 85004

Mr. Charles Slocum
General Manager
Wellton-Mohawk Irrigation and Drainage District
30570 Wellton-Mohawk Drive
Wellton, AZ 85356

Mr. Wade Noble
Attorney at Law
1405 West 16th Street
Yuma, AZ 85364

Mr. Larry Killman
Project Manager
Greystone Environmental Consultants, Inc.
29851 Mountain View
Wellton, AZ 85356

"Managing and conserving natural, cultural, and recreational resources"

In reply refer to SHPO-2002-402
General comments



January 29, 2004

Deanna J. Miller, Director
Resources Management Office
Bureau of Reclamation
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470

Janet Napolitano
Governor

Attention: Pat Hicks, Regional Archaeologist

State Parks
Board Members

Re: Draft Archaeological Sample Survey Design for the Wellton-Mohawk Title
Transfer (LC-AZ-02-06 [P]); BR
SHPO-2002-402 (17764)

Chair
Suzanne Pfister
Phoenix

Gabriel Beechum
Casa Grande

Dear Ms. Miller:

John U. Hays
Yarnell

Thank you for continuing to consult with our office pursuant to Section 106 of the National Historic Preservation Act and implementing regulations at 36 CFR 800 and for providing a copy of the draft document titled "Archaeological Sample Survey Design for the Wellton-Mohawk Title Transfer Project," (SRI Technical Report 03-65). We appreciate the time provided for review, which allowed us to also review tribal responses. A number of our earlier questions were satisfactorily addressed during the November 19, 2003 meeting held in Goodyear. We offer the following comments:

Elizabeth Stewart
Tempe

William C. Porter
Kingman

William Cordasco
Flagstaff

Mark Winkleman
State Land
Commissioner

1. The document presents clearly a science-based approach and well-reasoned rationale for methods to be implemented in identifying archaeological sites within the title transfer lands (that is, from Landsat to survey design). Information gleaned from published ethnographic studies bolsters rationale for the survey design.

Kenneth E. Travous
Executive Director

Arizona State Parks
1300 W. Washington
Phoenix, AZ 85007

2. As mentioned at the November meeting, we are somewhat concerned that the proposed sample survey design was done before the complete results of the summer 2003 survey were known. Consultation and decisions about adequacy of sampling designs should be based on more specific information than is presented here. For instance: Site type categories presented in this document are very broad (i.e., prehistoric-period and historic-period sites). We would like to have more information regarding counts and locations by site type that were recorded by the summer survey.

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602.542.4180

Director's Office Fax:
602.542.4188

3. We are pleased that there will be Native American participation and input throughout the identification effort and beyond. Their participation can provide much needed cultural perspectives that are often missed by archaeological studies, both in planning and interpretation. If warranted, has current tribal input and insight on use of trails and other land uses been incorporated into the sampling design?

See pg. 9, top & 10, top.
Survey

*III data
w/ hands
Final
Survey in
progress.
see pg. 1 & 2
But see pg. 8
& 9 of sites
used.*

Letter to Ms. Miller
Draft Archaeological Sample Survey Design (LC-AZ-02-06 [P]); SHPO-2002-402
January 29, 2004
Page 2

4. We agree that trenching is effective as a geoarchaeological research method as well as a method to find subsurface archaeological materials. Trenching is particularly effective in alluvial deposits. However, trenching is not the only method available to identify subsurface materials. Remote sensing, suggested by several tribes, might be useful as well as less disturbing to buried archaeological sites. In some instances, such as in sand dunes, remote techniques might be more effective than trenching. Have remote sensing techniques been considered as another identification method?

3. We do not agree with the statement on page 9, second paragraph, that alternative approaches to survey in agricultural fields would be necessary to evaluate potential for subsurface archaeological sites (emphasis ours). Evidence indicating subsurface archaeological sites found during pedestrian survey in agricultural fields is the rule rather than the exception in both the Salt River Valley and the Middle Gila River Valley, even when fields have been laser leveled.

We do agree, however, that backhoe trenching is often necessary as a means to test archaeological sites in agricultural fields for information potential and thus Register-eligibility, and to test for presence of deeply buried (i.e., Archaic period) sites.

Technical comments on the draft document:

- a) Page 1, second paragraph, second line: Add "districts" to the list of historic properties. This is particularly important in this undertaking where it is likely that archaeological sites, trails, rock art, etc. can be considered components of a district(s) – which in turn, might represent a prehistoric community(ies).
- b) Page 3, third paragraph, third line – Replace "irrgardless" with "regardless."

We appreciate your continuing cooperation with our office in complying with the requirements of historic preservation. We look forward to continuing to consult on this undertaking. Please contact me at (602) 542-7142 or by email at jmedley@pr.state.az.us if you have any questions or concerns.

Sincerely,


Jo Anne Medley
Compliance Specialist/Archaeologist
State Historic Preservation Office



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-2630
ENV-3.00

APR 30 2004

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. James Garrison
Arizona State Historic Preservation Officer
Arizona State Parks
1300 West Washington
Phoenix, AZ 85007

Subject: Transmission of Amendments to Class II Inventory Design for the Wellton-Mohawk Title Transfer, and Notice of Intent to Initiate the Class II Inventory as Amended (LC-AZ-02-06 [P]) (SHPO-2002-402 [17764 & 18422])

Dear Mr. Garrison:

On February 2, 2004, a meeting was held in your office to address concerns raised by your staff and tribal representatives regarding the proposed Class II inventory design for the identification of prehistoric archaeological sites on Bureau of Reclamation withdrawn and acquired lands that are a part of the Wellton-Mohawk Title Transfer. In attendance at this meeting were Ms. Joanne Medley and Mr. Vincent Schiavitti of your staff; Regional Archaeologist for Reclamation's Lower Colorado Region, Ms. Pat Hicks; Mr. Chad Smith, archaeologist for the Ahamakav Cultural Society of the Fort Mohave Indian Tribe; Mr. Rein Vanderpot, Mr. Christopher Dore, and Mr. John Hall of Statistical Research, Inc. (SRI); Mr. Larry Killman of Greystone Environmental; and Ms. Sheila Logan of GEI Consultants. Concerns and issues addressed during this meeting included: 1) the potential for utilizing various types of remote sensing techniques to assist in locating both surface and subsurface cultural resources; 2) the amount of area being proposed for inclusion in the Class II archaeological survey; and 3) the distribution of the parcels selected for inclusion in the Class II survey. SRI has amended the Class II inventory design in response to points brought out in these discussions. Enclosed is a copy of the amendments to the Class II inventory design. The following paragraphs provide additional background and rationale for the amendments.

Remote sensing techniques considered during the February 2, 2004, discussion included the use of satellite-based and airborne-ground penetrating radar imagery; pedestrian-ground penetrating radar, soil resistivity, and proton magnetometer studies; and analysis of low altitude aerial photographs to assist in mapping the prehistoric trail system. Enclosed is a summary of the major points raised during the remote sensing techniques discussion. As this summary indicates, the use of remote sensing technology to assist in locating surface and subsurface archaeological

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WTR-4.00 - Irrigation Districts WMIDL

sites on the title transfer parcels is problematic for variety of reasons, including, but not limited to: 1) the lack of availability from commercial sources of remote sensing imagery of sufficient resolution to be useful, and 2) the lack of availability of baseline data concerning how cultural features of the sort common to the area might be expressed on satellite and aerial photographs, and as anomalies in data generated by pedestrian methods. In effect, the remote sensing imagery and baseline data that would allow the images to be interpreted, does not exist for the area of the Wellton-Mohawk Title Transfer. Low altitude overflights of the area would need to be done, and baseline studies would need to be conducted to determine how surface and subsurface sites might be being expressed as anomalies on the resulting images, which would be prohibitively expensive. Given the various problems associated with employment of remote sensing technology on a large scale to this project, the Class II inventory design has not been amended to incorporate its use.

The discussants did not entirely rule out the use of pedestrian-based remote sensing technology. In the event a cultural feature or layer of cultural material were to be exposed in the wall of one of the backhoe trenches, it might be possible to use one of the pedestrian-based techniques to define the extent of the feature or layer, or the landform or stratum on or within which it was located. If such an event does occur during the geomorphological trenching study, further consideration will be given to using pedestrian-based remote sensing techniques at that time.

Concerns were also expressed relating to the amount of area to be surveyed as a part of the Class II inventory, and the distribution of the parcels being proposed for inventory. On Page 10 of the *Archaeological Sample Survey Design for the Wellton-Mohawk Title Transfer Project* that was transmitted to your office and to the tribes for review, SRI notes, were the remaining areas of exposed bedrock and desert pavement to be surveyed; as much as 90 percent of the prehistoric resources on the title transfer parcels would have been found. The survey design also notes areas adjacent to major washes might also be somewhat sensitive. In consideration of these concerns, Reclamation agreed to conduct additional inventory in these areas, but noted the agency would not commit to inventory of 100 percent of the areas of concern, as there might be very small amounts of acreage on some parcels which could be difficult to locate and access, thus creating a logistical nightmare for the field crews. At the February 2, 2004, meeting, Reclamation directed SRI to re-examine the aerial photographs of the project area to identify additional areas of exposed bedrock and desert pavement, and to determine if there were areas on the parcels near major washes they had not already proposed to include in the Class II inventory.

In the enclosed amendments to the Class II inventory design, SRI has identified an additional 428 acres of exposed bedrock and desert pavement for inclusion in the survey. These amendments also outline SRI's approach to selection of these additional areas. Adding the additional 428 acres to the 1,157 acres previously proposed for inventory brings the total number of acres to be surveyed as a part of the Class II to 1,585 acres. The Class III inventory of the high sensitivity area on the first terrace overlooking the Gila River, and the effort to relocate and re-record previously documented sites on the title transfer parcels, resulted in the survey of 3,883 acres. When the Class II inventory is complete, a total of 5,468 acres will have been inventoried for prehistoric archaeological sites at a Class III level of effort. This total represents

9.2 percent of all lands included in the title transfer, including those on the floodplain, and disturbed lands with various irrigation system facilities and rights-of-way on them which have little to no potential for intact archaeological resources. Perhaps more importantly, the 5,468 acres that will have been surveyed at a Class III level when the Class II portion of the inventory is complete, represents 19.7 percent of all the *undisturbed* lands within the title transfer parcels. It should also be noted that additional prehistoric sites will likely be located during the course of conducting the inventory for historic period archaeological sites. The proposed approach to the historic sites inventory will be forwarded to your office for review in the near future. When all the inventory work has been completed, greater than 20 percent of the undisturbed lands on the title transfer parcels will have been examined at a Class III level.

The implementing regulations for Section 106 of the National Historic Preservation Act (NHPA) direct agencies to make a "reasonable and good faith effort to carry out appropriate identification efforts" (36 CFR 800.4(b)(1)). Reclamation has given over considerable time and effort to consulting with your office and the tribes concerning its identification effort for the Wellton-Mohawk Title Transfer. The enclosed amendments to the Class II inventory design represent another good faith effort on the part of Reclamation to identify and address all interested parties' concerns with the inventory design as originally proposed. This letter thus serves as Reclamation's notice of intent to implement the Class II inventory for the Wellton-Mohawk Title Transfer project as presented in the draft inventory submitted to your office and the tribes for review in November 2003, as amended in SRI's letter to Reclamation dated April 14, 2004, (see enclosure).

Thank you and your staff for your assistance in this effort. If you or your staff have any questions concerning the proposed amendments to the Class II inventory design, please direct them to Ms. Hicks by phone at 702-293-8705, or by e-mail at phicks@lc.usbr.gov.

Sincerely,



Deanna J. Miller, Director
Resources Management Office

Enclosures - 3

cc: Mr. Charles Slocum, General Manger, Wellton-Mohawk Irrigation and Drainage District,
30570 Wellton-Mohawk Drive, Wellton, AZ 85356
Mr. Wade Noble, Attorney at Law, 1405 West 16th Street, Yuma, AZ 85364
Mr. Larry Killman, Project Manager, Greystone Environmental Consultants, Inc.,
29851 Mountain View, Wellton, AZ 85356
(w/o encls)

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United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470

MAY 07 2004

IN REPLY REFER TO:

LC-2630
ENV-3.00

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. James Garrison
Arizona State Historic Preservation Officer
Arizona State Parks
1300 West Washington
Phoenix, AZ 85007

Subject: Transmission of Proposed Survey Strategy for Historic Archaeological Sites on Parcels
Proposed for Transfer to the Wellton-Mohawk Irrigation and Drainage District
(LC-AZ-02-06 [P])

Dear Mr. Garrison:

Enclosed for your review and comment is a copy of Statistical Research, Inc.'s (SRI), proposed strategy for the historic archaeological site inventory associated with the Wellton-Mohawk Title Transfer project. It would be greatly appreciated if you would expedite review of this document and return your comments to us as soon as possible.

If you have any questions concerning SRI's proposal, please direct them to Regional Archaeologist, Ms. Pat Hicks, by phone at 702-293-8705 or by e-mail at phicks@lc.usbr.gov.

Sincerely,

Deanna J. Miller, Director
Resources Management Office

Enclosure

cc: Mr. Charles Slocum, General Manager, Wellton-Mohawk Irrigation and Drainage District,
30570 Wellton-Mohawk Drive, Wellton, AZ 85356
Mr. Wade Noble, Attorney at Law, 1405 West 16th Street, Yuma, AZ 85364
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29851 Mountain View, Wellton, AZ 85356
(w/o encl)

bc: YAO-1000, 2700, 7000, 7100, 7300 (w/o encl)

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