



Red Feather Archeology
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Subject: Evaluation of a Report by Augustana College for Powertech Inc. dated 3/2008

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In reviewing the report by the Archeology Laboratory of Augustana College for the proposed Dewey-Burdock project for Powertech, Incorporated, I have encountered several problems. The most bothersome problem is that it would appear that this report has been characterized as an evaluative report of the cultural resources in this area – it is definitely not that. This report is essentially an inventory of cultural resources in the area and primarily avoids the required analyses directed by the State of South Dakota. A number of the sites were found by ALAC personnel to be ineligible for inclusion to the National Register of Historic Places. Apparently by the information currently available to me, this was accomplished by simply stating that the surface area was disturbed; no sub-surface testing was performed in these areas. In the approximately 20 years that I have worked as a Principal Investigator in South Dakota, it has always been required that prior to the finding of ineligibility of any cultural materials, sub-surface testing must be accomplished; this is so even if the item involved is an isolated artifact. This sub-surface testing must be a specific size, minimum of 50 by 50 centimeters, and taken down through a minimum of 2 sterile 10-centimeter levels. None of the sites that I reviewed where a finding of ineligibility was recorded was this accomplished. The sub-surface testing was primarily instituted due to the finding that a strictly surface evaluation of ineligibility was extremely subjective.

Also there were a number of sites that were found to be unevaluated and needing further work. These sites cannot be counted as either ineligible or eligible for inclusion to the National Register of Historic Places. There is, however, an implication by omission that these sites or at least a majority of them, are ineligible; this finding is erroneous at best.

At this point, no true professional evaluation of the impact of the current proposed project(s) in this area can be done with the information available, as required in a Section 106 investigation/evaluation.

Sincerely,



Louis A. Redmond, PhD
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