



The Confederated Tribes of the Colville Reservation

History/Archaeology Program
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February 28, 2022

Kelly Bacon
Staff Planner, Kittitas County Community Development Services
411 N. Ruby St. Suite 2
Ellensburg, WA 98926

RE: Suncadia Phase 2 Division 7 LP-22-00001

Dear Kelly Bacon,

Thank you for consulting with the Confederated Tribes of the Colville Reservation (CCT). Please be advised that the proposed undertaking lies within the traditional territories of the Wenatchi Tribe, one of twelve constituent tribes of the Confederated Tribes of the Colville Reservation (Colville Confederated Tribes [CCT]), which is governed by the Colville Business Council (CBC). The CBC has delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CCT with regard to cultural resources management issues throughout the traditional territories of all of the constituent tribes under Resolution 1996-29. This area includes parts of eastern Washington, northeastern Oregon, the Palus (Palouse) territory in Idaho, and south central British Columbia.

We do not concur with Section B.13.b of the Attachment to SEPA Environmental Checklist Phase 2 Division 7, which states that archaeological sites KT01354 and KT01357 will not be affected by the proposed development. We do not believe that sufficient information exists to make this determination (see below). Given that no subsurface testing has ever occurred for these sites, their boundaries are not delineated in a way that ensures they will not be impacted by project activities. **We recommend a full cultural resource survey, inclusive of subsurface testing, be conducted of the entire project area, prior to any permitting or Determination of Significance.** Given the sensitive nature of the precontact sites in the project area, this survey should be coordinated closely with the CCT, DAHP, and other affected Tribes.

The following comments are the same as those previously provided regarding Phase 3 Division 17 LP-21-0002, and will continue to be our comments regarding any Suncadia subdivision until meaningful changes are effected regarding the process for protecting cultural resources during the development of Suncadia. Again, we recommend consultation between your office, the CCT, DAHP, and other affected Tribes occur to revise the Suncadia MPR Conditions of Approval.

The applicant's answers to Section B.13(a-d) of the provided SEPA checklist provide references to the original DEIS and FEIS, as well as the Suncadia MPR Conditions of Approval sections C-21 to C-23. These sections appear to be based on recommendations made during the original cultural resource survey effort for the MountainStar Resort in 1998 (Griffin and Churchill).

-We consider the scope, methods, results, and recommendations of the 1998 cultural resources survey to be woefully inadequate as a means of determining the current proposed projects' impacts on cultural resources. This survey did not include any subsurface testing. The authors noted that "Additional resource areas undoubtedly exist within the MountainStar Resort but, due to poor ground visibility throughout the resort area, have not been identified..." The CCT does not consider such a survey to be adequate for identifying cultural resources for a project with ground disturbing activities, much less as the basis for the Suncadia MPR Conditions of Approval, and subsequent Determinations of Non-Significance.

-The SEPA checklist for this project refers to sections C-21 through C-23 of the MPR Conditions of Approval as the methods to be used to assess potential impacts to resources. Section C-23 requires subsurface testing "within identified cultural constraint areas..." only. To the best of my knowledge, these "cultural constraint areas" were identified by the 1998 effort that did not include any subsurface testing and explicitly described the likelihood of additional unidentified resources. We do not believe that sufficient information currently exists to adequately answer questions B.13.(a-d) of the SEPA checklist.

-In short, the entirety of the MPR Conditions of Approval rely on a twenty-two year old cultural resource survey that explicitly details its own inadequacy, does not meet current DAHP standards, and was not conducted with the proposed project in mind. We do not consider this to be a solid basis for permitting Suncadia projects.

-The CCT are not mentioned in any of these documents as an affected tribe, despite the project area being squarely in the traditional territory of the Wenatchi Tribe. To my knowledge, the CCT were not a party to and were not consulted with regarding the Suncadia MPR Conditions of Approval, despite the project area being squarely in the traditional territory of the Wenatchi Tribe. Our recommendations and concerns are not bound by an agreement we were not included in drafting.

-We recommend a full cultural resource survey, inclusive of subsurface testing, be conducted of the entire project area, prior to any permitting or Determination of Significance. The CCT should be consulted with on the proposed plans, timeline, and results of this survey. This survey and subsequent reporting should meet DAHP's Standards for Cultural Resource Reporting.

-The permitting process for this project seems to follow the trajectory of other Suncadia Divisions (i.e. Phase 2 Division 1 LP-20-0003, Phase 3 Division 17 LP-21-00002). In effect, this is resulting in Suncadia projects being allowed to move forward without cultural resource investigations that would otherwise be considered standard practice. The CCT's recommendations and concerns set forth regarding this project are likely to be repeated for any subsequent Divisions if this does not change. We recommend consultation between your office, the CCT, DAHP, and other affected Tribes occur to affect revisions to the Suncadia MPR Conditions of Approval.

Thank you for consulting with the Confederated Tribes of the Colville Reservation. Please note that these comments are based on information available to us at the time of the project review.

We reserve the right to revise our comments as information becomes available. If you have any questions or concerns, please contact me at (509)-978-9064. If you would like to speak with the THPO, please contact Guy Moura at (509)-634-2695 or guy.moura@colvilletribes.com.

Sincerely,

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