From: DAHP SEPA

To: Zach Torrance-Smith

Cc: <a href="mailto:guy.moura@colvilletribes.com">guy.moura@colvilletribes.com</a>; Connor Armi; "steve@snoqualmietribe.us"; darnell.sam.adm@colvilletribes.com;

john.sirois.adm@colvilletribes.com; milton.davis.adm@colvilletribes.com; Casey Barney; Corrine Camuso; Gregg

Kiona; Jessica Lally; Noah Oliver

Subject: RE: Shoreline Review: PSA-23-00360 Request for Comments (DAHP Project Tracking # 2023-09-06168)

**Date:** Friday, September 29, 2023 1:35:30 PM

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Hi Zach,

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

Our statewide predictive model indicates that there is a high probability of encountering cultural resources within the proposed project area. However, due to the small footprint of the project, DAHP is not requesting a cultural resources survey at this time. We do ask that you prepare an Inadvertent Discovery Plan (IDP) and prepare construction crews for the possibility of encountering archaeological material during ground disturbing activities.

Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving any correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.

Thank you for the opportunity to comment on this project. Please ensure that the DAHP project Tracking Number is attached to any future communications about this project.

Should you have any questions, please feel free to contact me.

All the best,

Sydney Hanson, MA (she/her) | Local Government Archaeologist Eastern Washington & Columbia River Counties 360.280.7563 | sydney.hanson@dahp.wa.gov

Department of Archaeology & Historic Preservation | <a href="www.dahp.wa.gov">www.dahp.wa.gov</a> 1110 Capitol Way S, Suite 30 | Olympia WA 98501 PO Box 48343 | Olympia WA 98504-8343

**From:** Zach Torrance-Smith <zach.torrancesmith@co.kittitas.wa.us>

Sent: Friday, September 15, 2023 9:14 AM

**To:** enviroreview@yakama.com; corrine\_camuso@yakama.com; Jessica\_Lally <Jessica\_Lally@Yakama.com; noah\_oliver@yakama.com; casey\_barney@yakama.com; kozj@yakamafish-nsn.gov; matj@yakamafish-nsn.gov; barh@yakamafish-nsn.gov; DAHP SEPA <sepa@dahp.wa.gov>; steve@snoqualmietribe.us; dahp@snoqualmietribe.us; adam@snoqualmietribe.us; guy.moura@colvilletribes.com; sam.rushing@colvilletribes.com; connor.armi.hsy@colvilletribes.com; darnell.sam.adm@colvilletribes.com; john.sirois.adm@colvilletribes.com; milton.davis.adm@colvilletribes.com

**Cc:** Jamey Ayling <jamey.ayling@co.kittitas.wa.us>; Chace Pedersen <chace.pedersen@co.kittitas.wa.us>

**Subject:** Shoreline Review: PSA-23-00360 Request for Comments

### External Email

Parcel# 738934

Good morning all,

You are receiving this request for shoreline review with an associated 15 day comment period because this application (Preliminary Site Analysis, PSA-23-00360) is proposing a project (STORAGE/GARAGE POLE BUILDING) within shoreline jurisdiction that is not exempt from cultural resources review pursuant to Kittitas County SMP 5.1(B)(1)(a). In accordance with the settlement agreement between the Yakama Nation and Kittitas County, Kittitas County Resolution No. 2018-195 and the Department of Ecology Final Approval (letter dated 08/31/21, effective 9/14/21) of the County's amended Shoreline Master Program, Kittitas County is hereby requesting comments regarding the proposed project.

This request is based off of the following amendment to Kittitas County SMP 5.1(B) as shown below:

### B. <u>Regulations</u>

- 1. Project Approval Requirements. Prior to issuing a permit, exemption, or other approval for a proposed project in a shoreline area, the County shall determine whether or not a cultural resources review or archaeological survey shall be required under this Section 5.1(B)(1).
  - a. Exceptions. No cultural resources review or survey shall be required under this Section

5.1(B)(1) where the project applicant can demonstrate one or more of the following conditions is met:

- i. The project or use does not include any ground disturbance. Projects that require the insertion of structural elements, but which do not require any excavation and create no spoil piles, shall be considered non-ground-disturbing for purposes of this Section (e.g. driving T-posts, planting tree seedlings with a hoedad).
- ii. The project is limited to the installation of infrastructure entirely within the same area as an existing project or development.
- iii. The project's entire three-dimensional area of proposed ground-disturbance is located within previous fill or previously disturbed earth.
- iv. A professional archaeologist has surveyed the entire project area within the last ten (10) years, and the survey report(s) show that no cultural, archaeological, or historic resources were found.
- b. Cultural Resources Review. The County shall provide electronic notice and a fifteen (15) day comment opportunity to DAHP and affected Native American tribes for all proposed projects in shoreline areas which are not excluded under Section 5.1(B)(1)(a) above.
  - i. When applicable, the above notification requirement will be included in the Preliminary Site Analysis process.
  - ii. Where the proposed project is already subject to a comment period through shoreline permitting and/or SEPA review, this comment period shall be run concurrently.
  - iii. For shoreline projects that fall under a shoreline exemption permit and have no notification requirement, if not already completed through the Preliminary Site Analysis process, the above notification and cultural resources review requirements will occur prior to the issuance of an exemption permit.

Kittitas County will not act on the attached request until the end of the 15 day comment window. Please respond to this email with any comments regarding this proposal no later than end of business day **October 2, 2023.** 

Please contact me should you have any questions.

Best regards,

# **Zach Torrance-Smith**

Planner 1 – Kittitas County Community Development Services 411 N. Ruby St., Suite 2 Ellensburg, WA 98926 P: 509-962-7079

Ext: 079

zach.torrancesmith@co.kittitas.wa.us

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message id: 38eb45916c6dcbdac24bb8719d004a14

From: Connor Armi
To: Zach Torrance-Smith

Cc: Guy Moura; Hanson, Sydney (DAHP)

Subject: Re: Shoreline Review: PSA-23-00360 Request for Comments

**Date:** Monday, September 18, 2023 9:01:47 AM

**CAUTION:** This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

#### Hello Zach.

This consult is in reference to Preliminary Site Analysis PDSA-23-00360. Ground disturbing activities include the construction of a plumbed and electrified storage facility with a workshop and carport.

This undertaking is located within the CCT Traditional Territories. We request any undertakings, particularly those involving ground disturbing activities, to have an IDP in place prior to implementation.

The proposed project lies within the traditional territory of the Wenatchi Tribe, 1 of the 12 constituent tribes of the Confederated Tribes of the Colville Reservation (CTCR), 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 CTCR 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 territory in Idaho, and south-central British Columbia.

If ground disturbing activities are to be conducted, such as the installation of a septic system or the scraping of a driveway, a cultural resource surface survey and sub-surface testing of the area in and directly around the proposed ground disturbance are recommended as a surface observation will not be an accurate assessment of the existent potential for subsurface cultural deposits. This test should be to the terminal depth of the septic installation to ensure the totality of the presence or absence of cultural material.

There are known cultural resources of precontact and historic significance nearby and this particular plat is considered Very High Risk for an inadvertent discovery according to the DAHP predictive model. This parcel has not been previously surveyed and a preliminary archaeological investigation would be prudent.

Please be advised that a documented Traditional Cultural Property (TCP) is located less than a quarter-mile from the proposed project area. TCPs are places important to the CTCR for the preservation and continuation of the community's traditional lifestyle. TCPs can be, but are not limited to, religious areas, sacred areas, resource gathering areas (plant, animal, fish, and mineral), places associated with stories and legends, archaeological and ethnographic sites, habitation sites, camp sites, pictograph and petroglyph locations, special use sites, trails, and places with Indian names. For native people, natural resources are cultural resources. Traditional cultural plant resources are not only cherished for fiber, food, medicine, and building material, but are an intrinsic aspect of indigenous sovereignty; these plants link the people of the present to the people of the past.

CCT requests a cultural resource survey prior to the implementation of ground disturbing activities and that during implementation that there be an inadvertent discovery plan or (IDP) in place to ensure compliance with all Section 106 and relevant cultural resource laws both federally and to the state of Washington.

Thank you for consulting with the Colville Confederated Tribes History and Archaeology Program.

On behalf of Guy Moura, Tribal Historic Preservation Officer.

Sincerely,

Connor Armi | Archaeologist Senior MA, RPA History/Archaeology Program

Confederated Tribes of the Colville Reservation PO Box 150 | Nespelem, WA 99155 d: 509-634-2690 | c: 509-631-1131 connor.armi.hsy@colvilletribes.com

On Fri, Sep 15, 2023 at 9:15 AM Zach Torrance-Smith

<<u>zach.torrancesmith@co.kittitas.wa.us</u>> wrote:

| Parcel#

Good morning all,

738934

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- a. *Exceptions*. No cultural resources review or survey shall be required under this Section 5.1(B)(1) where the project applicant can demonstrate one or more of the following conditions is met:
  - i. The project or use does not include any ground disturbance. Projects that require the insertion of structural elements, but which do not require any excavation and create no spoil piles, shall be considered non-ground-disturbing for purposes of this Section (e.g. driving T-posts, planting tree seedlings with a hoedad).
  - ii. The project is limited to the installation of infrastructure entirely within the same area as an existing project or development.
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- b. Cultural Resources Review. The County shall provide electronic notice and a fifteen (15) day comment opportunity to DAHP and affected Native American tribes for all proposed projects in shoreline areas which are not excluded under Section 5.1(B)(1)(a) above.
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  - ii. Where the proposed project is already subject to a comment period through shoreline permitting and/or SEPA review, this comment period shall be run concurrently.
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Please contact me should you have any questions.

Best regards,

## **Zach Torrance-Smith**

Planner 1 – Kittitas County Community Development Services

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