



26 July 2021

Rachael Stevie  
Planner I  
Kittitas County Community Development Services  
411 Ruby St. Suite 2  
Ellensburg, WA 98926

RE: Pierson Shoreline Exemption SX-21-00009, SE-21-00014

Dear Rachael Stevie,

Thank you for your letters of 22 July, 2021 regarding Shoreline Exemption Permitting SX-21-00009 – Pierson and SEPA checklist SE-21-00014.

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.

Regarding the SEPA checklist (SE-21-00014) for this project: the answers given in Section B.13.a-d are inadequate to accurately assess this project's impacts on historic and cultural preservation. For example, under section B.13.b., no professional studies are cited that led to a determination that no cultural features are present. Similarly, section B.13.c. states that "Historical publications and knowledge" were used as methods to assess potential impacts, with no examples given. Section B.13.d. also lists no proposed measures to avoid, minimize or compensate for loss, changes to, and disturbance to resources.

Given the extent of ground disturbance proposed, the project's location in an area that is highly likely to contain cultural resources, and the lack of any previous cultural resource surveys in the vicinity, we recommend that a professional cultural resource survey be requested prior to issuance of the exemption permit, cited in the SEPA checklist, and conducted prior to the commencement of project activities. Please keep us updated as plans to this effect move forward.

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 or

aren.orsen.hsy@colvilletribes.com. If you wish to speak with the THPO, please contact Guy Moura at (509) 634-2695 or guy.moura@colvilletribes.com.

Sincerely,

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