

**From:** [Connor Armi](#)  
**To:** [Jeremiah Cromie](#)  
**Cc:** [Guy Moura](#); [Hanson, Sydney \(DAHP\)](#)  
**Subject:** Re: SE-23-00006 Snoqualmie Pass Utility District - Notice of Application  
**Date:** Wednesday, April 12, 2023 11:25:42 AM

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Hello Jeremiah Cromie,

This consult is in reference to Miscellaneous SEPA Application – SE-23-00006 Snoqualmie Pass. 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. This undertaking involves intense ground disturbing activities in the expansion and decommissioning of the wastewater treatment facilities adjacent to a major fresh water resource.

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, a cultural resource surface survey and sub-surface testing of the area in and directly around the proposed ground disturbance are requested as a surface observation will not be an accurate assessment of the existent potential for sub-surface cultural deposits. Please do so prior to ground disturbing activities. These tests should be to the terminal depth of the implementation to ensure the totality of the presence or absence of cultural material. There are known cultural resources of historic and pre-contact significance nearby and the project APE is considered Very High Risk for an inadvertent discovery according to the DAHP predictive model. CCT H/A recommends that during implementation 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. Previous surveys of the area have not included subsurface testing near the proposed APE and those surveys are all over a decade old.

We disagree with the SEPA checklist section 13. There are known sites evidencing Native American occupation of the area near the proposed APE. The sites have not been evaluated for eligibility and should be prior to implementation. Previous surveys were inadequate to assess the risk to cultural resources by this project. Tribes consider certain botanicals cultural resources and no ethnobotanical reviews have been conducted in the area. There are known traditional cultural properties nearby and as this project is projected to an extended duration of a few years terminating in 2025/2026, a broader cultural resource survey is requested.

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

Sincerely,

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

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On Thu, Apr 6, 2023 at 9:24 AM Jeremiah Cromie <[jeremiah.cromie@co.kittitas.wa.us](mailto:jeremiah.cromie@co.kittitas.wa.us)> wrote:

Good morning,

CDS is requesting comments on the following SEPA application: **SE-23-00006 Snoqualmie Pass Utility District**. This project is for improvements to the Utility District's Wastewater Treatment Facility. Links to the file materials can be found below. Kittitas County anticipates issuing a DNS for this project application and is using the optional SEPA process found in WAC 197-11-355. This may be the only opportunity to comment on the ecological impacts of this project. The comment period will end **Friday, April 21, 2023 at 5p (PDT)**. **CDS will assume your agency does not wish to provide comments if not received by this date and time.** Please contact me directly with any questions or issues accessing the materials.

Internal Link: [SE-23-00006 Snoqualmie Pass Utility District](#)

External Link: [SE-23-00006 Snoqualmie Pass Utility District](#)

Jeremiah Cromie

Planner II

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