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Jeremiah Cromie
Planner II
Kittitas County
Community Development Services
411 N. Ruby Street, Suite 2
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SUBJECT SE-23-00014 – SEPA Checklist Response to Comments
Summit Deli & Chevron
521 State Route 906
Snoqualmie Pass, Washington 98068

Mr. Cromie,

At the request of Bob Shin, Aerotech Environmental Consulting, Inc. (“Aerotech”) has prepared the following response to comments regarding SEPA Application SE-23-00014. The Kittitas County Community Development Services (“KCCDS”) transmitted comments on June 20, 2023.

WSDOT AVIATION

No comments submitted.

SNOQUALMIE TRIBE

Thank you for the opportunity to review and comment. Based on the information provided and our understanding of the project and its APE, we request to have the opportunity to be on-site to monitor all ground disturbing activities. Do please understand that we may not be able to be on-site during such activities but still want to be afforded the opportunity. This is in an area the Snoqualmie Tribe considers culturally significant and has a high probability to have unknown archaeological deposits. If any archaeological work is performed, we request notification. An IDP should not be used in lieu of archeological investigation. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance.

The excavation is located within an area of previously modified land associated with the construction of the Summit Deli & Chevron; however, we appreciate that the Snoqualmie Tribe considers the APE culturally significant and there is a probability for unknown archaeological deposits to occur. The tribe will be provided a schedule of all ground disturbing activities to provide the opportunity for the tribe’s onsite monitor to be present. In addition, a consulting

qualified archeologist will be present during all ground disturbing activities to ensure any potential resources are protected.

COLVILLE TRIBE

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.

There are known cultural resources of historic and pre-contact significance nearby and the division of this particular area is considered Very High Risk for an inadvertent discovery according to the DAHP predictive model.

Please be advised that a documented Traditional Cultural Property (TCP) is located less than a mile from the proposed project.

TCPs are places importance 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.

Due to previous disturbance and the high probability of an Inadvertent Discovery, CCT requests during implementation that there be an inadvertent discovery plan or (IDP) and an archaeological monitor be in place to ensure compliance with all Section 106 and relevant cultural resource laws both federally and to the state of Washington.

The excavation is located within an area of previously modified land associated with the construction of the Summit Deli & Chevron; however, we appreciate that the Colville Tribe considers the APE culturally significant and there is a probability for unknown archaeological deposits to occur. An IDP will be in place prior to the start of the project. In addition, a consulting qualified archeologist will be present during all ground disturbing activities to ensure any potential resources are protected.

As stated previously, the excavation is located within an area of previously modified land associated with the construction of the Summit Deli & Chevron. While we do not anticipate any significant discovery of artifacts, STANTEC will provide an IDP, and an archeologist will be present during excavation activity to ensure any potential resources are protected.

WSDOT

1. *The subject property is in the vicinity of State Route 906 (SR 906), a Managed Access Class 4 highway with a posted speed limit of 35 miles per hour. Currently, access to the subject property is via an existing permitted connection at milepost 0.31left. No additional access to SR 906 will be allowed.*
2. *All loads transported on WSDOT rights-of-way must be within the legal size and load limits or have a valid oversize and/or overweight permit.*
3. *It is the applicant’s responsibility to keep and maintain SR 906 free of debris.*

Aerotech acknowledges WSDOT’s requirement keeping SR 906 free of debris and all loads to be managed between legal size and load limits unless a valid oversize and/or overweight permit is utilized. Currently there is a north and south entrance to the property and no additional access is anticipated to complete the project work.

DEPARTMENT OF ECOLOGY

The applicant must consider how the Petroleum Contaminated Soil (PCS) will be managed. PCS should not be used as clean fill and needs to be treated prior to any use.

The management of PCS will be completed according to the established state and local requirements, as well as the disposal facility to be utilized. Any backfill reused will be verified via an onsite analytical laboratory to ensure no PCS is used as clean overburden. Sampling of stockpiles will occur according to Table 6.9 taken from the Guidance for Remediation of Petroleum Contaminated Sites, Ecology Publication No. 10-09-057.

Table 6.9 Typical Number of Samples Needed to Adequately Characterize Stockpiled Soil (1)	
Cubic Yards of Soil	Number of Samples for Chemical Analysis
0-100	3
101-500	5
501-1000	7
1001-2000	10
>2000	10 + 1 for each additional 500 cubic yards

(1) Source: 1995 Guidance for Remediation of Petroleum Contaminated Soil.

KITTITAS DEPARTMENT OF HEALTH

No comments submitted.

DEPARTMENT OF ARCHEOLOGY & HISTORIC PRESERVATION (DAHP)

It looks like Stantec plans to monitor ground disturbing activities for this project. Please ensure that the monitoring report is uploaded to 2023-02-00835 on WISAARD, and shared with the interested tribes upon completion.

Aerotech acknowledges DAHPs request, and a monitoring report will be uploaded as requested.

KITTITAS COUNTY PUBLIC WORKS

Access:

- 1. An approved access permit shall be required from the Kittitas County Department of Public Works prior to creating any new driveway access or altering an existing access. Refer to Chapter 12 of the Kittitas County Code for access requirements.*
- 2. Maintenance of driveway approaches shall be the responsibility of the owner whose property they serve. The County will not maintain accesses.*
- 3. In addition to the above-mentioned conditions, all applicable Kittitas County Road Standards apply to this proposal. Access is not guaranteed to any existing or created parcel on this application.*

Survey

And property corners disturbed or destroyed by this proposal shall be reset by a Land Surveyor licensed in the State of Washington.

Flood

Parcel #131936 is not located in the FEMA identified special flood hazard area.

Aerotech acknowledges the comments from Kittitas County Public Works. No additional access is anticipated for this project to existing or new parcels. Additionally, the maintenance of the driveway will be ensured throughout the project.

Aerotech and Mr. Bob Shin appreciate your assistance in the matter. Please do not hesitate to contact me at 206-715-1626 with any questions regarding the Remedial Excavation.

Sincerely,



Justin Foslien
Senior Licensed Geologist WA
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