

**From:** [Connor Armi](#)  
**To:** [Zach Torrance-Smith](#)  
**Cc:** [Guy Moura](#); [Hanson, Sydney \(DAHP\)](#)  
**Subject:** Re: SX-24-00015 PSE Transmission Pole Replacement - Notice of Application  
**Date:** Thursday, July 11, 2024 4:43:13 PM

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Hello Zach,

This consult is in reference to SX-24-00015 PSE Transmission Pole Replacement. This undertaking involves ground disturbance related to the in-kind replacement of transmission poles.

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 precontact and historic significance nearby and this particular APE is considered Very High Risk for an inadvertent discovery according to the DAHP predictive model.

CCT requests a new cultural resource survey for the APE, which should include a sub-surface testing component as clearing of trees and the establishment of staging areas are expected 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](mailto:connor.armi.hsy@colvilletribes.com)

On Wed, Jul 10, 2024 at 3:16 PM Zach Torrance-Smith

<[zach.torrancesmith@co.kittitas.wa.us](mailto:zach.torrancesmith@co.kittitas.wa.us)> wrote:

**Parcels# 484235, 371836, 10248, 084235, 634235, 234235**

Good afternoon,

You are receiving this request for shoreline review with an associated 15-day comment period because this application (Shoreline Exemption Permitting, SX-24-00015 PSE Transmission Pole Replacement) is proposing a project within shoreline jurisdiction that is not exempt from cultural resources review pursuant to Kittitas County SMP 5.1(B)(1)(a). **The proposed project is to replace transmission poles along the PSE Cascade – Cle Elum transmission corridor.** 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 1/14/19, effective 1/28/19) of the County's amended Shoreline Master Program, Kittitas County is hereby requesting comments regarding the proposed project.

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

B. Regulations

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 **July 25, 2024.**

A link to the application materials hosted on the CDS website can be found below.

**External Link:** [SX-24-00015 PSE Transmission Pole Replacement](#)

Please contact me should you have any questions.

***Zach Torrance-Smith***

***Planner I***

***Kittitas County Community Development Services***

***411 N. Ruby St., Suite 2***

***Ellensburg, WA 98926***

***P: 509-962-7079***

***[zach.torrancesmith@co.kittitas.wa.us](mailto:zach.torrancesmith@co.kittitas.wa.us)***

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message id: 38eb45916c6dcdbdac24bb8719d004a14

**From:** [DAHP SEPA](#)  
**To:** [Zach Torrance-Smith](#)  
**Cc:** [guy.moura@colvilletribes.com](#); [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: SX-24-00015 PSE Transmission Pole Replacement - Notice of Application (DAHP Project Tracking # 2024-07-05268)  
**Date:** Wednesday, July 24, 2024 1:48:59 PM

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**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.

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, because this project will involve replacing transmission poles in-kind, 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](mailto:sydney.hanson@dahp.wa.gov)

Department of Archaeology & Historic Preservation | [www.dahp.wa.gov](http://www.dahp.wa.gov)  
1110 Capitol Way S, Suite 30 | Olympia WA 98501

Please consider the environment before printing this email

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

**Sent:** Wednesday, July 10, 2024 3:16 PM

**To:** enviroreview@yakama.com; corrine\_camuso@yakama.com; jessica\_lally@yakama.com; noah\_oliver@yakama.com; casey\_barney@yakama.com; Jeff Kozma <kozj@yakamafish-nsn.gov>; matj@yakamafish-nsn.gov; barh@yakamafish-nsn.gov; steve@snoqualmtribe.us; dahp@snoqualmtribe.us; adam@snoqualmtribe.us; guy.moura@colvilletribes.com; sam.rushing@colvilletribes.com; connor.armi.hsy@colvilletribes.com; DAHP SEPA <sepa@dahp.wa.gov>

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

**Subject:** SX-24-00015 PSE Transmission Pole Replacement - Notice of Application

External Email

**Parcels# 484235, 371836, 10248, 084235, 634235, 234235**

Good afternoon,

You are receiving this request for shoreline review with an associated 15-day comment period because this application (Shoreline Exemption Permitting, SX-24-00015 PSE Transmission Pole Replacement) is proposing a project within shoreline jurisdiction that is not exempt from cultural resources review pursuant to Kittitas County SMP 5.1(B)(1)(a). The proposed project is to replace transmission poles along the PSE Cascade – Cle Elum transmission corridor. 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 1/14/19, effective 1/28/19) of the County's amended Shoreline Master Program, Kittitas County is hereby requesting comments regarding the proposed project.

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B. Regulations

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 **July 25, 2024.**

A link to the application materials hosted on the CDS website can be found below.

**External Link:** [SX-24-00015 PSE Transmission Pole Replacement](#)

Please contact me should you have any questions.

***Zach Torrance-Smith***

***Planner I***

***Kittitas County Community Development Services***

***411 N. Ruby St., Suite 2***

***Ellensburg, WA 98926***

***P: 509-962-7079***

***[zach.torrancesmith@co.kittitas.wa.us](mailto:zach.torrancesmith@co.kittitas.wa.us)***

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**From:** [Adam Osbekoff](#)  
**To:** [Zach Torrance-Smith](#)  
**Subject:** RE: SX-24-00015 PSE Transmission Pole Replacement - Notice of Application  
**Date:** Thursday, July 11, 2024 8:38:58 AM

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Hello Zach

The Snoqualmie Tribe [Tribe] is a federally recognized sovereign Indian Tribe. We were signatory to the Treaty of Point Elliott of 1855; we reserved certain rights and privileges and ceded certain lands to the United States. As a signatory to the Treaty of Point Elliot, the Tribe specifically reserved among other things, the right to fish at usual and accustomed areas and the “privilege of hunting and gathering roots and berries on open and unclaimed lands” off-reservation throughout the modern-day state of Washington.

Thank you for the opportunity to review and comment. Based on the information provided and our understanding of the project and its APE we have no substantive comments to offer at this time. However, please be aware that if the scope of the project or the parameters for defining the APE change we reserve the right to modify our current position.

Thank you.

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**To:** enviroreview@yakama.com; corrine\_camuso@yakama.com; jessica\_lally@yakama.com; noah\_oliver@yakama.com; casey\_barney@yakama.com; kozj@yakamafish-nsn.gov; matj@yakamafish-nsn.gov; barh@yakamafish-nsn.gov; Steven Moses <steve@snoqualmietribe.us>; DAHP <dahp@snoqualmietribe.us>; Adam Osbekoff <adam@snoqualmietribe.us>; guy.moura@colvilletribes.com; sam.rushing@colvilletribes.com; connor.armi.hsy@colvilletribes.com; sepa@dahp.wa.gov  
**Cc:** Jamey Ayling <jamey.ayling@co.kittitas.wa.us>; Chace Pedersen <chace.pedersen@co.kittitas.wa.us>; Bradley Gasawski <bradley.gasawski@co.kittitas.wa.us>  
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***Zach Torrance-Smith***

***Planner I***

***Kittitas County Community Development Services***

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# **KITTITAS COUNTY**

## **DEPARTMENT OF PUBLIC WORKS**

### **MEMORANDUM**

**TO:** All Staff  
**FROM:** Public Works Plan Review Team  
**DATE:** July 25<sup>th</sup>, 2024  
**SUBJECT:** SX-24-00015 PSE Transmission Pole Replacement

<b>ENGINEERING</b>	Except as exempted in KCC 14.05.060, no grading or filling upon a site involving more than one hundred (100) cubic yards shall be performed without a grading permit from the County Engineer or Public Works designee (KCC 14.05.050). An application for grading in excess of five hundred (500) cubic yards shall be accompanied by an engineered grading plan (KCC 14.05.080). (CP)
<b>FLOOD</b>	Transmission poles are considered a minor project and are exempt from Floodplain Development permitting. Please note the floodway boundary is not included in the provided site plan. The floodway is a highly restricted portion of the Special Flood Hazard Area and should be included in all maps of such. (SC)
<b>WATER MITIGATION/ METERING</b>	No comments. (SC)
<b>AIRPORT</b>	No comments

Please contact Kittitas County Public Works (509) 962-7523 with any questions.