

From: [Jeremy Johnston](#)
To: [Hanson, Sydney \(DAHP\)](#); ["SEPA \(DAHP\)"](#)
Cc: ["Guy Moura \(HSY\)"](#); ["Aren Orsen \(HSY\)"](#); ["steve@snoqualmietribe.us"](#); ["Casey Barney"](#); ["Corrine Camuso"](#); ["Gregg Kiona"](#); ["Jessica Lally"](#); ["Kate Valdez"](#); ["Noah Oliver"](#); [Rachael Stevie \(CD\)](#); [Dan Carlson](#)
Subject: RE: LP-21-00001 Bull Ranch- Notice of SEPA Action & Public Hearing
Date: Thursday, May 27, 2021 2:40:53 PM
Attachments: [image001.png](#)

Good Afternoon Sydney,

Rachael sent your question to me regarding the reasoning behind our SEPA decision to not require an Archeological Survey for the Bull Ranch Plat project on parcel 298633.

The County utilizes the thresholds established in KCC 17B.05.010 Cultural, archaeological and historical resources, in determining when to require a survey. Initially there was some question as to whether the project met one of the exceptions established in KCC 17B.05.010(B)(1)(a)(iii)-

“The project’s entire three-dimensional area of proposed ground-disturbance is located within previous fill or previously disturbed earth.”

The site has been historically utilized for a variety of significant ground disturbing activities associated with agricultural uses. Although we thought there was some justification for this exception, we had some concerns that this may not meet the letter of this exemption. We continued on to section 17B.05.010(B)(1)(c), which outlines the specific thresholds for requiring a survey. It is ultimately this section in which our determination to not require a survey was made. These thresholds are noted below along with our analysis in red:

- i. “The project area is located within one quarter (1/4) mile from either a protected Native American pre-contact site recorded with DAHP, or a protected historic site that is listed or eligible, or potentially eligible and unevaluated, in the DAHP inventory.”

We received no indication from DAHP or an affected Tribe that the project site met this criteria. The comment letter from DAHP did not mention that the site was within ¼ mile of a pre-contact site recorded with DAHP or a protected historic site.

- ii. “DAHP or an affected Native American tribe timely comments through the above cultural resources review process (or concurrent permitting or environmental review process, if applicable), and requests an archaeological survey be completed due to the presence of one or more of the following risk-factors:

- Documented historic feature(s) on the property or located within one quarter (1/4) mile from the project area;
- Previous positive archaeological survey results from a survey on the property or within one quarter (1/4) mile from the project area; or
- A tribally-recorded site located within one quarter (1/4) mile of the project area.”

The comment letter provided by DAHP did note any documented historic features, positive archeological survey results, or tribally recorded sites located on the site or within ¼ mile of the site.

- iii. DAHP and an affected Native American tribe timely comment through the above cultural

resources review process (or concurrent permitting or environmental review process, if applicable), and both DAHP and the affected Native American tribe request that an archaeological survey be completed due to a professional archaeologist's determination that the project area is in an area that is at high-risk for the presence of archaeological resources (e.g. in an area with high-risk soil deposit types such as historic high-energy soil deposits, or soils with multiple depositional contexts).

CDS did not receive a comment from an affected Tribe requesting a survey of the site during the comment period. This criteria requires concurrence from DAHP and an affected Tribe to require a survey. It also notes a determination of "high-risk" for the presence of archeological resources. The comment letter provided by DAHP noted a moderate probability.

iv. The County determines that an archaeological survey is otherwise warranted.

Due to the expressed "moderate" probability for the presence of archeological resources, combined with none of the other criteria being met, and a previously heavily ground disturbed site, CDS did not find grounds to require a survey.

I hope this provides some insight into how we evaluate project applications in reference to this code section. Let me know if I can clarify further.

Have a great Memorial Day Weekend.

Jeremy Johnston

Kittitas County CDS, Planning Official

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"Building Partnerships-Building Communities"

Please Note: In an effort to mitigate the spread of COVID-19 and the Governor's "Safe Start" reopening plan, Kittitas County Community Development Services is currently in Phase 3 and is open to the public in a limited capacity. At this time many of us are on a rotating schedule working from home and in the office; during this time I will do my best to respond to you as promptly as possible.

From: SEPA (DAHP) <sepa@dahp.wa.gov>

Sent: Thursday, May 27, 2021 1:39 PM

To: Rachael Stevie (CD) <rachael.stevie.cd@co.kittitas.wa.us>

Cc: Guy Moura (HSY) <Guy.Moura@colvilletribes.com>; 'Aren Orsen (HSY)'

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Hi Rachael,

We had requested a survey for this project on 4/19 (see attached). Can you clarify why the County is only requiring an inadvertent discovery plan?

Thanks!

All the best,

Sydney Hanson, MA | Transportation Archaeologist

(pronouns: she / her)

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**All DAHP employees are currently working remotely as a precaution against COVID-19. Thank you for your patience and understanding.*

Please consider the environment before printing this email

From: Rachael Stevie (CD) <rachael.stevie.cd@co.kittitas.wa.us>

Sent: Thursday, May 20, 2021 8:51 AM

To: Steve Lathrop <Steve@lathropdev.com>; steve@lwhsd.com; Betsy Lewis <betsy@lathropdev.com>; David Lathrop <David@lathropdev.com>; john.everett@esmcivil.com; ECY RE SEPA REGISTER <separegister@ecy.wa.gov>; yusid@ci.ellensburg.wa.us; Mau, Russell E (DOH) <Russell.Mau@DOH.WA.GOV>; Mike Flory <mike.flory@co.kittitas.wa.us>; Valerie Robinson <robinsonr1val@yahoo.com>; rabs GURL@gmail.com; Craig Jones <jonesc@ci.ellensburg.wa.us>; mayod@ci.ellensburg.wa.us; Hanson, Sydney (DAHP) <sydney.hanson@dahp.wa.gov>; ECY RE CRO SEPA Coordinator <crosepa@ecy.wa.gov>; Candie Leader <candie.leader@co.kittitas.wa.us>; Chad Bala <bala.ce@gmail.com>; lizritz2000@hotmail.com; Nelson, Jennifer L (DFW)