



January 23, 2024

Connor Armi  
Confederated Tribes of the Colville Reservation  
PO Box 150  
Nespelem, WA 99155

**RE: WSDOT I-90 Wilson Creek Bridge Application (PAU-23-00001) - Transmittal of  
Comments from CTCR**

Dear Mr. Armi,

This letter is in response to comments received from the CTCR during the comment period for WSDOT's I-90 Wilson Creek Bridge (PAU-23-00001) with Kittitas County Community Development Services.

In accordance with the 2019 Programmatic Agreement, the proposed project was reviewed by a WSDOT Cultural Resources Specialist and was exempted under the stipulations listed below, as the ground-disturbing work will be limited to the I-90 median fill prism. A project-specific Inadvertent Discovery Plan will be included in the contract per WSDOT Standard Specifications.

- A-1 Roadway surface replacement, overlays, shoulder treatments, rumble strips, pavement repair, seal coating, pavement grinding, and pavement markings that do not include ground disturbance or is within the demonstrated vertical and horizontal limits of previous disturbance.
- A-10 Bridge deck pavers and striping projects.
- A-13 Work within interchanges, medians of divided highways, or between a highway and an adjacent frontage road within the demonstrated vertical and horizontal limits of previous construction or disturbance.
- A-23 Geotechnical borings, data collection, and non-invasive environmental sampling required to support the planning or design of an undertaking.

Additionally, the project's scope and programmatic exemption status were presented at WSDOT's annual (in-person) meeting with the Colville Tribe in February of 2023, where no further cultural survey was recommended.

We appreciate your continued support and coordination on WSDOT projects. Please reach out to Kelsey Cogar ([cogark@wsdot.wa.gov](mailto:cogark@wsdot.wa.gov)) should additional comments or questions arise.

Sincerely,

Kelsey Cogar   
WSDOT SCR Environmental Coordinator

William Sauriol  
WSDOT SCR Environmental Manager

KC:WS

Enclosure: Sec 106 Exemption  
PAU correspondence

cc: Bradley Gasawski (Kittitas County CDS)  
Guy Moura (CTCR)  
Sydney Hanson (DAHP)

May 16, 2023

TO: Kelsey Bechtholdt, South Central Region

FROM: Erin Littauer, Cultural Resources Specialist

RE: **I-90 Wilson Creek Bridge Westbound and Westside Canal Bridge  
Eastbound Deck Rehabilitation Project and Geotech, National Historic  
Preservation Act (NHPA) Section 106 Exempt Status**

PLEASE NOTE: If design modifications or additions are developed following this review which exceed the conditions noted in the current plans or description herein, those modifications must be evaluated by a WSDOT Cultural Resources Specialist.

Pursuant to 36 CFR 800.14, the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Western Federal Lands, the Advisory Council on Historic Preservation (ACHP), the Washington State Department of Transportation (WSDOT), and the Washington State Department of Archaeology and Historic Preservation (DAHP) have entered into a programmatic agreement regarding the implementation of the Federal-aid Highway, Federal Lands Highway, and Federal Transit Programs in Washington State. Stipulation VII (A)(1) of the programmatic agreement (PA) defines the procedure to screen all highway, bridge and transit infrastructure activities for potential effects to historic properties. Screened activities presumed to have minimal or no potential to effect historic properties may be exempt from further Section 106 review by FHWA, FTA, DAHP or ACHP per terms and conditions set forth in Appendix B of the PA.

### **Project Description**

Project activities will include bridge deck rehabilitation of the westbound bridge over Wilson Creek and eastbound bridge at the Westside Canal crossing on I-90. The purpose of the activity is to repair and resurface the existing bridge decks to maintain the structural integrity, continue safe operation of the highway, and extend the service life of the bridges. At the Wilson Creek crossing on westbound I-90, a temporary span bridge will be installed in the highway median as a detour during construction. Geotechnical borings will be located in the highway median along Wilson Creek for the detour structure and scaffolding for the repairs. A standard median detour will be constructed at the Westside Canal crossing. Work at both locations will be located entirely within the WSDOT ROW and previously disturbed sediments (or roadway fill) of the median.

### **Review and Documentation**

The cultural resources assessment for this project included a review of historical and contemporary geospatial and environmental data; WSDOT GIS, DAHP WISAARD databases, and the DNR LiDAR Web Portal, to identify any known cultural resources or previous cultural resources studies within the project area. The WSDOT SRView photographic documentation was also evaluated. No impact to any known cultural resources have been identified and the likelihood is low for encountering any previously unidentified cultural resources given the project does not include any ground disturbing activities beyond the existing paved surface of the roadway and previously disturbed sediments and roadway fill in the highway median.

### **Determination of Exemption**

Following the results of this review, and in accordance with Stipulation VII(A)(1) of the PA, this undertaking is determined to have minimal or no potential to cause effects to historic properties and is exempt from further Section 106 consultation per Stipulation A-1, A-10, A-13,

and A-23 of Exhibit B, which states:

A-1 Roadway surface replacement, overlays, shoulder treatments, rumble strips, pavement repair, seal coating, pavement grinding, and pavement markings that do not include ground disturbance or is within the demonstrated vertical and horizontal limits of previous disturbance.

A-10 Bridge deck pavers and striping projects.

A-13 Work within interchanges, medians of divided highways, or between a highway and an adjacent frontage road within the demonstrated vertical and horizontal limits of previous construction or disturbance.

A-23 Geotechnical borings, data collection, and non-invasive environmental sampling required to support the planning or design of an undertaking.

This determination will be posted for public record on WSDOT's website and this memorandum serves as the written record of this determination.

As noted at the outset of this memorandum, if project plans are modified or additions are made, those changes must be evaluated by a WSDOT Cultural Resources Specialist. An Unanticipated Discovery Plan should be attached to this project in order to provide guidance in the event of post-review discovery of cultural resources during this project.

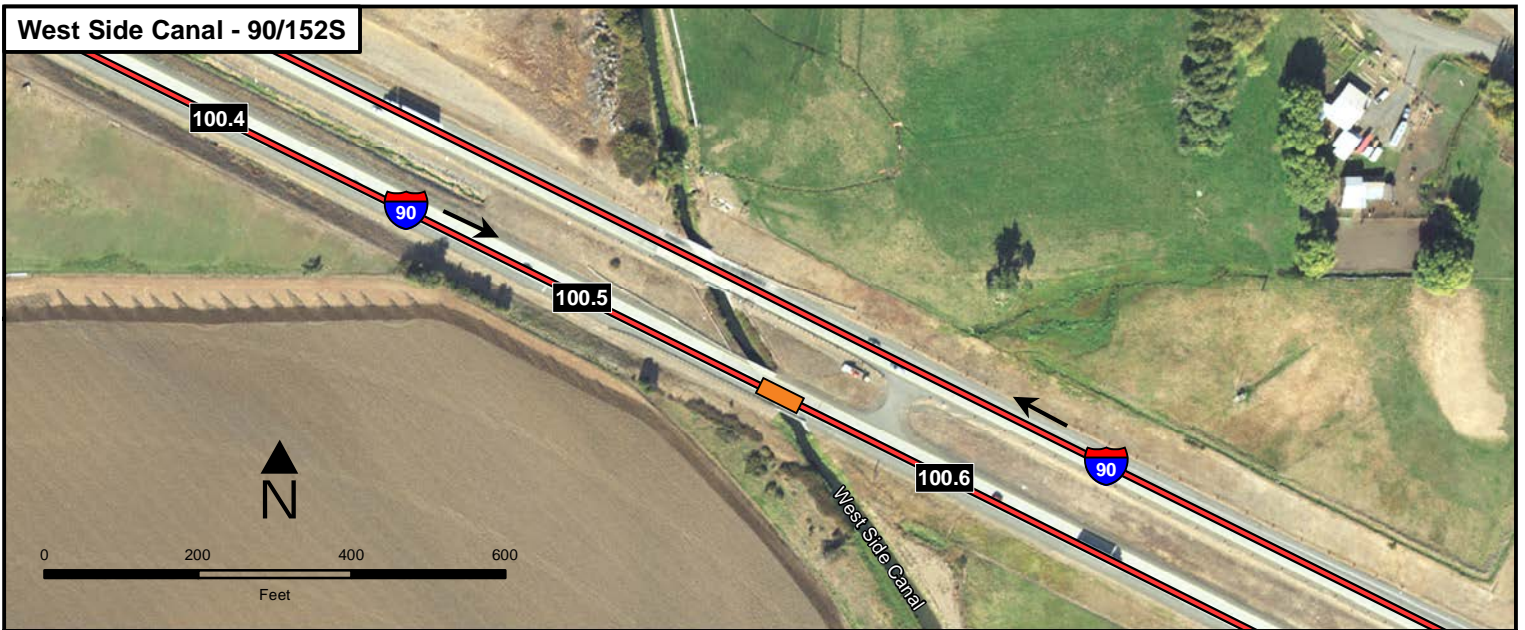
If any additional information is needed, please contact Erin Littauer, WSDOT Cultural Resources Specialist, via email at [erin.littauer@wsdot.wa.gov](mailto:erin.littauer@wsdot.wa.gov) or via telephone at 360.570.2448. I certify that, to the best of my knowledge at the time of writing, the information contained in this memorandum is true and correct.



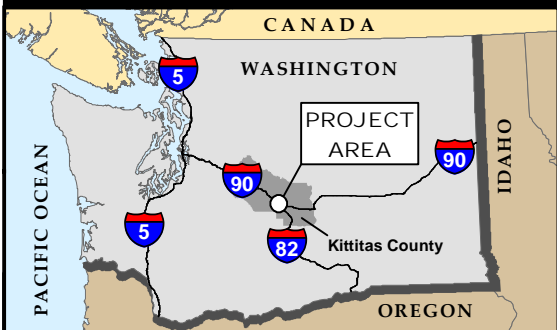
Erin Littauer, MA, RPA  
Cultural Resources Specialist  
WSDOT Environmental Services Office  
2214 RW Johnson Boulevard SW  
Tumwater WA 98512-611

PO Box 47332  
Olympia WA 98504-7332  
360.570.2448  
[Erin.littauer@wsdot.wa.gov](mailto:Erin.littauer@wsdot.wa.gov)

Cc. Scott Anfinson, WSDOT SCR



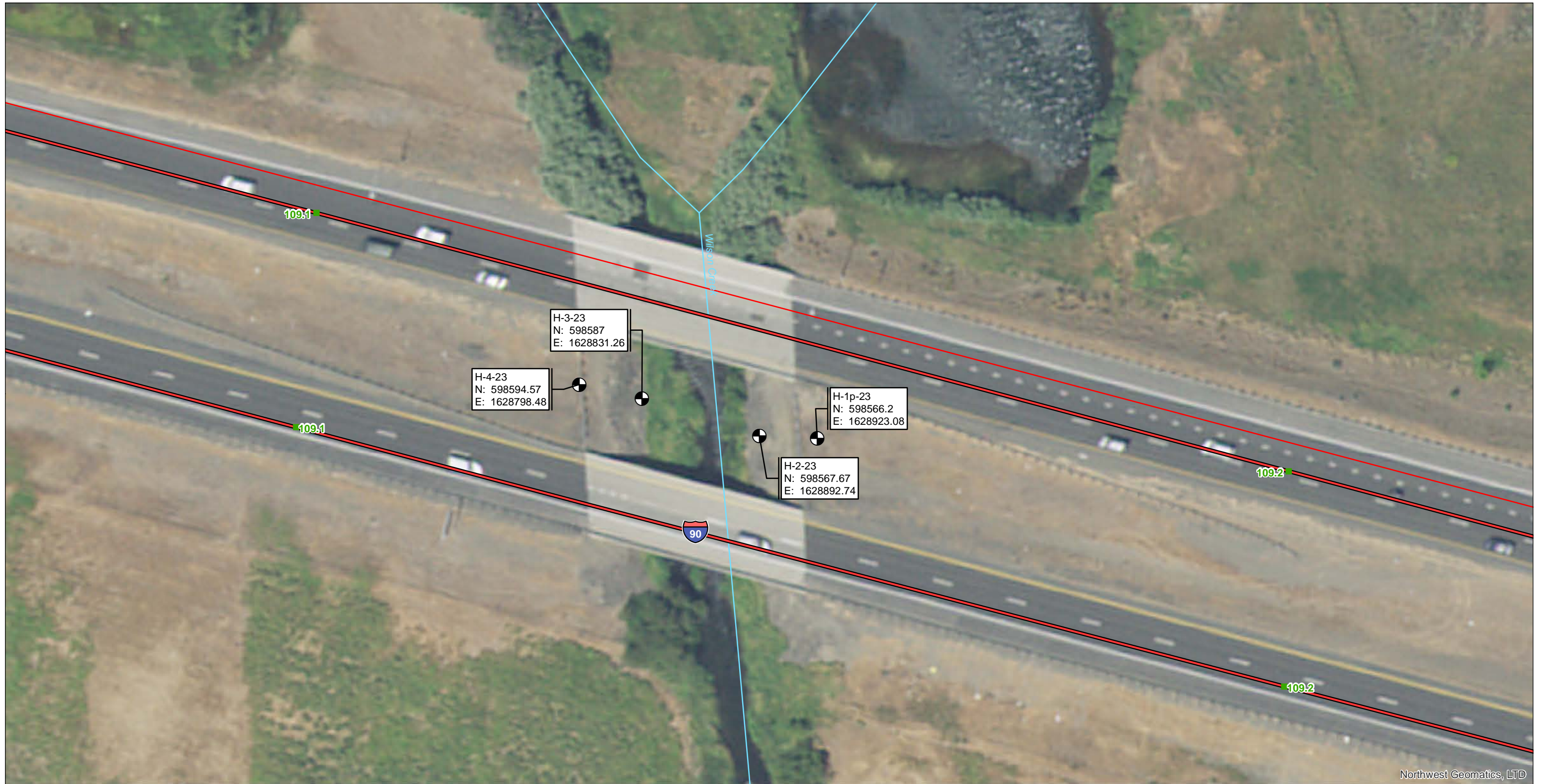
## I-90 Wilson Creek Bridge and West Side Canal Bridge Deck Rehabilitation



### Vicinity Map




- MP** Milepost Marker
- Project Bridge Location

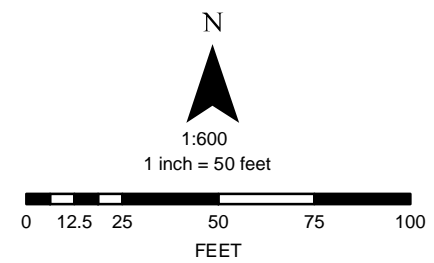




Northwest Geomatics, LTD

**LEGEND**

-  Test Borings
-  U.S. Interstate
-  NHD Rivers & Streams



JOB # XL6364 STATE ROUTE 090 MILEPOST 109.13 to 109.15

**TEST BORING LOCATIONS**  
 I-90 / Wilson Creek Bridge West Bount &  
 West Side Canal Bridge East Bound



Prepared By: TRACY TROPLE Date: 5/4/2023

## Bradley Gasawski

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**From:** Connor Armi <connor.armi.hsy@colvilletribes.com>  
**Sent:** Tuesday, January 2, 2024 1:02 PM  
**To:** Bradley Gasawski  
**Cc:** Guy Moura; Hanson, Sydney (DAHP)  
**Subject:** Re: PAU-23-00001 WSDOT I-90 Wilson Creek Bridge - NOA Memo

**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.

Hello Bradley,

This consultation is in response to PAU-23-00001 WSDOT I-90 Wilson Creek Bridge. This undertaking is for repair efforts for the I-90 Highway Bridge over Wilson Creek. This will include ground disturbance around the creek, but not in the creek.

CCT H/A requests a cultural resource survey prior to implementation and that there be an Inadvertent discovery plan in place prior to implementation, we will also look for DAHP concurrence on this request.

This undertaking is located within the CCT Usual and Accustom 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 Usual and Accustom territory of the Moses-Columbia 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 no known cultural resources of precontact and historic significance nearby, but this parcel is considered Very High Risk for an inadvertent discovery according to the DAHP predictive model. The bridge under consideration sits at a confluence of Naneum Creek and Wilson Creek which increases the risk to cultural resources. There was a previous survey of the area to the northwest but it was conducted in 1998 and outside the scope of this current proposal.

CCT H/A requests a Cultural Resource Survey and further requests 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.

Sincerely,

Connor Armi | Archaeologist Senior MA, RPA

History/Archaeology Program

Confederated Tribes of the Colville Reservation

PO Box 150 | Nespalem, WA 99155

d: 509-634-2690 | c: 509-631-1131

[connor.armi.hsy@colvilletribes.com](mailto:connor.armi.hsy@colvilletribes.com)

On Tue, Jan 2, 2024 at 8:52 AM Bradley Gasawski <[bradley.gasawski@co.kittitas.wa.us](mailto:bradley.gasawski@co.kittitas.wa.us)> wrote:

Good Afternoon,

CDS is requesting comment on the following **Public Agency & Utilities Exception** application: **PAU-23-00001 WSDOT I-90 Wilson Creek Bridge**. The file materials can be found attached to this email. The comment period will end **January 17, 2024, at 5pm**. CDS will assume your agency does not wish to provide comment if not received by this date. Please let me know if you have any issues accessing the materials.

Thank you,

**Bradley Gasawski** | Planner I

Kittitas County Community Development Services | 411 N. Ruby St; Suite 2 | Ellensburg, WA 98926

Office: 509.962.7539

Email: [bradley.gasawski@co.kittitas.wa.us](mailto:bradley.gasawski@co.kittitas.wa.us)

If this is about a Public Records request, please go to <http://www.co.kittitas.wa.us/request/default.aspx> and fill out a request for public records through the GovQA portal.

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