

**CR-04 INVENTORY OF HISTORIC PROPERTIES WITH
TRADITIONAL CULTURAL SIGNIFICANCE
REVISED STUDY PLAN**

**SKAGIT RIVER HYDROELECTRIC PROJECT
FERC NO. 553**

Seattle City Light

**April 2021
RSP**

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List of Acronyms and Abbreviations

AAA.....	American Anthropological Association
AAG.....	Association of American Geographers
ACHP.....	Advisory Council of Historic Preservation
APE.....	area of potential effects
ARMMP.....	(Skagit) Archaeological Resources Mitigation and Management Plan
ARPA.....	Archaeological Resources Protection Act
BIA.....	Bureau of Indian Affairs
CFR.....	Code of Federal Regulations
City Light.....	Seattle City Light
CR.....	cultural resource
CRWG.....	Cultural Resource Work Group
DAHP.....	Department of Archaeology and Historic Preservation
ELC.....	Environmental Learning Center
FERC.....	Federal Energy Regulatory Commission
FOIA.....	Freedom of Information Act
HPMP.....	Historic Properties Management Plan
HRMMP.....	(Skagit) Historic Resources Mitigation and Management Plan
ISR.....	Initial Study Report
LP.....	licensing participant
NAGPRA.....	Native American Graves Protection and Repatriation Act
NHPA.....	National Historic Preservation Act
NNTC.....	Nlaka’pamux Nation Tribal Council
NPS.....	National Park Service
NRB.....	National Register Bulletin
NRHP.....	National Register of Historic Properties
O&M.....	operations and maintenance
PA.....	Programmatic Agreement
PAD.....	Pre-Application Document
PRM.....	Project River Mile
Project.....	Skagit River Hydroelectric Project
PSP.....	Proposed Study Plan

PTRCI	Properties of Traditional Religious and Cultural Importance
RCW	Revised Code of Washington
RLNRA	Ross Lake National Recreation Area
RM	river mile
RSP	Revised Study Plan
RWG	Resource Work Group
SHPO	State Historic Preservation Officer
SITC	Swinomish Indian Tribal Community
SSIT	Sauk-Suiattle Indian Tribe
STI.....	Stillaguamish Tribe of Indians
TCL	traditional cultural landscape
TCP	traditional cultural property
THPO	Tribal Historic Preservation Officer
U.S.C.....	United States Code
USFS	U.S. Forest Service
USGS	U.S. Geological Survey
USR.....	Updated Study Report

1.0 INTRODUCTION

1.1 General Description of the Project

The Skagit River Hydroelectric Project (Project), licensed to The City of Seattle, Washington, and operated through its publicly-owned electric power utility Seattle City Light (City Light), is located in northern Washington State and consists of three power generating developments on the Skagit River – Ross, Diablo, and Gorge – and associated lands and facilities. The Project generating facilities are in the Cascade Mountains of the upper Skagit River watershed, between Project River Miles (PRM) 94.7 and 127.9 (U.S. Geological Survey [USGS] RMs 94.2 and 127).¹ Power from the Project is transmitted via two 230-kilovolt powerlines that span over 100 miles and end just north of Seattle at the Bothell Substation. The Project also includes two City Light-owned towns, an Environmental Learning Center (ELC), several recreation facilities, and several parcels of fish and wildlife mitigation lands.

Project generating facilities are all located in Whatcom County, although Ross Lake, the most upstream reservoir, crosses the U.S.-Canada border and extends for about one mile into British Columbia at normal maximum water surface elevation. Gorge Powerhouse, the most downstream facility, is approximately 120 miles northeast of Seattle and 60 miles east of Sedro-Woolley, the nearest large town. The closest town is Newhalem, which is part of the Project and just downstream of Gorge Powerhouse. The primary transmission lines cross Whatcom, Skagit, and Snohomish counties; the fish and wildlife mitigation lands are in the same counties.

The Project Boundary is extensive, spanning over 133 miles from the Canadian border to the Bothell Substation just north of Seattle, Washington. In addition, there are “islands” of fish and wildlife mitigation lands and recreation facilities within the Skagit, Sauk, and South Fork Nooksack watersheds that are also within the Project Boundary. Project generating facilities are entirely within the Ross Lake National Recreation Area (RLNRA), which is administered by the National Park Service (NPS) as part of the North Cascades National Park Complex. The RLNRA was established in 1968 in the enabling legislation for North Cascades National Park to provide for the “public outdoor recreation use and enjoyment of portions of the Skagit River and Ross, Diablo, and Gorge lakes.” The legislation maintains the Federal Energy Regulatory Commission’s (FERC) jurisdiction “in the lands and waters within the Skagit River Hydroelectric Project,” as well as hydrologic monitoring stations necessary for the proper operation of the Project (16 United States Code [U.S.C.] § 90d-4; Public Law 90-544. Sec. 505 dated October 2, 1968, as amended by Public Law 100-668. Sec. 202 dated November 16, 1988).

1.2 Relicensing Process

The current FERC license for the Project expires on April 30, 2025, and City Light will apply for a new license no later than April 30, 2023. City Light formally initiated the relicensing process by filing a Notice of Intent and Pre-Application Document (PAD) with FERC on April 27, 2020 (City Light 2020a). The PAD includes descriptions of the Project facilities, operations, license

¹ City Light has developed a standard Project centerline and river mile system to be used throughout the relicensing process, including the study program, to replace the outdated USGS RM system. Given the long-standing use of the USGS RM system, both it and the Project River Mile (PRM) system are provided throughout this document. For further details see Section 7.0 of the main body RSP.

requirements, and Project lands as well as a summary of the extensive existing information available on Project area resources and early consultation on potential resource issues to be addressed during the relicensing.

In 2019-2020, City Light convened a series of Resource Work Groups (RWG) to engage agencies and other licensing participants (LP) in the Study Plan Development Process. Discussions with LPs continued in early 2021 with a series of topic-based discussions following filing of the Proposed Study Plan (PSP) on December 8, 2020 (City Light 2020b). This study plan reflects RWG and LP discussion and study requests and comments submitted by LPs.

1.3 Study Plan Development

Relicensing of the Project by FERC is considered a federal undertaking under Section 106 of the National Historic Preservation Act (NHPA), as amended, and its implementing regulations (36 Code of Federal Regulations [CFR] § 800). Section 106 establishes a process for federal agencies to identify, and take into account the effects of, their undertakings on historic properties, as defined below:

Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization [PTRCI] and that meet the National Register criteria [36 CFR § 800.16(l)(1)].

City Light's continued operations and maintenance (O&M) of the Project under a new FERC license may affect historic properties. Therefore, City Light is proposing four studies to assist FERC with its Section 106 compliance requirements. These studies consist of:

- (1) CR [cultural resource]-01 Cultural Resources Data Synthesis
- (2) CR-02 Cultural Resources Survey
- (3) CR-03 Gorge Bypass Reach Cultural Resources Survey
- (4) CR-04 Inventory of Historic Properties with Traditional Cultural Significance Study

On October 23, 2020, City Light released the Inventory of Historic Properties with Traditional Cultural Significance (Properties of Traditional Cultural Significance) Study Plan for LP review and comment. On November 16, 2020, the draft study plan was discussed at a Cultural Resources Work Group (CRWG) meeting. City Light reviewed and responded to all comments in an attachment to this study plan.

City Light is filing this study plan with FERC as part of its Revised Study Plan (RSP). It is an update to the version that was filed with the PSP and incorporating additional consultation with LPs prior to the filing date. The following study requests pertaining to cultural resources covered under Properties of Traditional Cultural Significance were submitted: NNTC-01 Completion of Traditional Cultural Property Survey, NNTC-02 Evaluation of Identified Sites, NNTC-04 Traditional Cultural Properties Mitigation and Management Study, SITC-03 Cultural Resources

Study, SSIT-04 Cultural Resources Transmission Line Study, SSIT-05 Cultural Resources Battle Site Study, and STI-01 Comprehensive Ethnographic Study. Several parties also noted interests related to this study plan in outreach meetings associated with implementation of the Cultural Resources Data Synthesis. This study plan, with modifications, addresses some of the elements identified in the study requests listed above, as explained in Section 6 of the RSP. Those elements of the study requests that were not adopted were primarily not adopted because they include studying areas and/or resources that fall outside the area of potential effects (APE). The modifications made to the study plan in response to study requests includes modifying the field schedule to allow for field survey during drawdown in the Project reservoirs, including pedestrian survey as a study method, and clarifying language regarding the hiring of multiple ethnographers to implement the study. City Light believes its study plan methods are sufficient to meet the study objectives and information needs of FERC, City Light, and the LPs.

PSP comments to this study plan were submitted by the Nlaka'pamux Nation Tribal Council and Upper Skagit Indian Tribe. City Light has addressed the specific comments and suggested edits in the study plan and responded to comments in the PSP comment/response table appended to the main body of the RSP. Modifications made to the study plan in response to comments and since the PSP include adding language regarding the treatment of unevaluated resources and stating that City Light understands and supports Indian tribes' and First Nations' efforts to provide context for locations of traditional cultural importance. This resulted in City Light agreeing to review and assess any such contextual information shared by the Indian tribes or First Nations up to one mile beyond the APE (in the U.S.) as part of the scope of this study.

This study plan outlines the methods and procedures that will be used to implement the Properties of Traditional Cultural Significance Study. This proposed study is designed to serve as partial fulfillment of Section 106 requirements and is intended to identify historic properties with traditional cultural significance within the APE, and preliminarily assess potential Project-related adverse effects on them, if any (described below).

Historic properties with traditional cultural significance may be called PTRCI or referred to as traditional cultural properties (TCP). The former term is outlined in a 1992 amendment to the NHPA regulations (36 CFR § 800.16(l)(1)) as explicit legal notice of their potential NRHP eligibility, and the latter term was coined and defined in *National Register Bulletin 38, National Register Guidelines for Evaluating and Documenting Traditional Cultural Properties* (NRB 38; Parker and King 1998), which is widely utilized as guidance in the identification, evaluation, and consideration of effects of federal decisions on historic properties with traditional cultural significance.

NRB 38 (Parker and King 1998:1) explains:

One kind of cultural significance a property may possess, and that may make it eligible for inclusion in the [National] Register, is traditional cultural significance. "Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally, through practice, or both. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a

community's historically rooted beliefs, customs, and practices. Examples of properties possessing such significance include:

- a location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world;
- a rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents;
- an urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices;
- a location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice; and
- a location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.

A traditional cultural property, then, can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community.

NRB 38 thus emphasizes that fundamental to the identification and NRHP-eligibility evaluation of historic properties with traditional cultural significance is an understanding that such properties require an accounting for and appreciation of the intangible (i.e., emotional, spiritual, historical, perspectival) qualities that make them culturally significant. "It is vital to evaluate properties thought to have traditional cultural significance from the standpoint of those who may ascribe such significance to them, whatever one's own perception of them, based on one's own cultural values, may be" (Parker and King 1998:4). As further stated in Bulletin 38:

The National Register lists, and [Section] 106 requires review of effects on, tangible cultural resources—that is, historic properties. However, the attributes that give such properties significance, such as their association with historical events, often are intangible in nature. Such attributes cannot be ignored in evaluating and managing historic properties; properties and their intangible attributes of significance must be considered together [Parker and King 1998:3].

Historic properties are tangible prehistoric or historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the NRHP. When such a property has traditional cultural significance, it is classified as a PTRCI and/or TCP. Historic properties with traditional cultural significance may also include "traditional cultural landscapes" (TCL). TCLs have not been formally defined by federal regulation. TCLs "are identified in the same manner in the Section 106 process as other types of historic properties of religious and cultural significance to Indian tribes or Native Hawaiian organizations" (Advisory Council of Historic Preservation [ACHP] 2012).

ACHP (2012:4) guidance on TCLs states that “[t]here is no single defining feature or set of features that comprise” these areas of interrelated significance. Rather:

Such places could be comprised of natural features such as mountains, caves, plateaus, and outcroppings; water courses and bodies such as rivers, streams, lakes, bays, and inlets; views and view sheds from them, including the overlook or similar locations; vegetation that contributes to its significance; and, manmade features including archaeological sites; buildings and structures; circulation features such as trails; land use patterns; evidence of cultural traditions, such as petroglyphs and evidence of burial practices; and markers or monuments, such as cairns, sleeping circles, and geoglyphs [ACHP 2012:4].

The ACHP further stresses “that the size of such properties or the potential challenges in the management of them should not be considerations in the evaluation of their significance” (ACHP 2012:2). This study plan is designed to account for historic properties that may have TCL status and significance within the APE, including how tangible contributing elements may interconnect and interrelate to convey the ongoing traditional religious and cultural importance of such historic properties.

The results of the Properties with Traditional Cultural Significance Study are expected to include confidential, culturally sensitive, and/or privileged information exempt from public release. City Light will protect the confidential and privileged information from public view, in consultation with each Indian tribe, First Nation, and other Section 106 consulting parties.

State and federal laws exempt certain types of cultural resources information from public disclosure (e.g., 54 U.S.C. Section 307103(a) of the NHPA, Section 9(a) of the Archaeological Resources Protection Act (ARPA), exclusions permitted by the Freedom of Information Act (FOIA), the Native American Graves Protection and Repatriation Act (NAGPRA), and Revised Code of Washington (RCW) 42.56.300).

2.0 STUDY PLAN ELEMENTS

2.1 Study Goals and Objectives

The primary goals of this Properties with Traditional Cultural Significance Study are to ensure historic properties with traditional cultural significance to Indian tribes and First Nations are identified and assessed for potential adverse effects on them from this Project during the next licensing term. The objective of this Study is to assist FERC in meeting its compliance requirements under Section 106 of the NHPA. These efforts will be conducted in consultation with Section 106 consulting parties, as required pursuant to 36 CFR § 800. Pursuant to 36 CFR § 800.4(c)(2), State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO) concurrence, as applicable, on NRHP eligibility determinations will also be sought.

2.2 Resource Management Goals

The study will provide information for resource agencies and Indian tribes with jurisdiction in the Project vicinity to address their respective goals and objectives for resource management. Resource management goals were provided by LPs in their study requests identified in Section 1.3 of this study plan.

City Light's goal, with regard to historic properties for this study, is to identify historic properties or potential historic properties of traditional cultural significance within the APE, and to assess whether continued Project O&M under the new FERC license, when issued, will affect or has the potential to affect any such resources. City Light plans to incorporate the findings from this study, along with other studies being completed for the relicensing, into a Historic Properties Management Plan (HPMP) for the Project. Because it is not possible to determine all of the adverse effects of various Project activities that may occur over the course of a license, City Light plans to develop the HPMP in consultation with the Section 106 participating parties that will be used to manage historic properties and unevaluated resources within the APE.² FERC typically completes the Section 106 process for relicensing projects by entering into a Programmatic Agreement (PA) with the SHPO and other parties, as appropriate,³ and the ACHP, if they choose to participate. As part of these agreements, FERC requires the licensee to develop and implement an HPMP.

Under the current Project license, City Light manages historic properties under two resource management plans that outline actions and processes to manage the historic properties within the Project Boundary: Skagit Historic Resources Mitigation and Management Plan (HRMMP; City of Seattle 1991) and Skagit Archaeological Resources Mitigation and Management Plan (ARMMP; Schalk et al. 2013). The Skagit HRMMP serves as a guide for City Light's operating personnel when performing necessary O&M activities, as well as identifying resource treatments designed to address potential ongoing and future effects to historic properties and contributing elements associated with the Skagit River and Newhalem Creek Hydroelectric Projects historic district

² On June 26, 2020, FERC issued a *Notice of Intent to File License Application for a New License and Commencing Pre-filing Process* within which FERC designated City Light as its non-federal representative for carrying out informal consultation pursuant to Section 106 (FERC Filing Accession no. 20200626-3024).

³ While some entities may be parties to FERC's PA, other Section 106 consulting entities may be invited to sign the PA as concurring parties, not signatories.

(DT00066). The Skagit ARMMP serves as a guide for continued management of historic properties and mitigation for projects within the Upper Skagit River Valley Archaeological District (DT0212). City Light anticipates that both of these plans will be updated and integrated into the HPMP for the new license and that the HPMP for the new license will provide for the management of Project effects on historic properties identified through this and other studies, as appropriate.

2.3 Background and Existing Information

Background and existing information on historic properties with traditional cultural significance was provided in Section 4.10.5 of the PAD (City Light 2020). Based on this information, some previous identification efforts for these historic properties have occurred within the APE, but these investigations are ongoing. City Light is currently implementing a study to further develop background and existing information on cultural resources, including some that convey traditional cultural significance: Cultural Resources Data Synthesis. Implementation of the Cultural Resources Data Synthesis has included outreach to Indian tribes and First Nations.

At this time, City Light has conducted outreach to the following potentially interested parties for the relicensing effort (in alphabetical order): ACHP,⁴ Bureau of Indian Affairs (BIA), Confederated Tribes of the Colville Reservation, FERC, Lummi Nation, Muckleshoot Indian Tribe, Nlaka'pamux Nation, Nooksack Indian Tribe, NPS, Samish Indian Nation, Sauk-Suiattle Indian Tribe, SHPO, Snohomish County, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Stó:lō First Nation, Suquamish Tribe, Swinomish Indian Tribal Community, Tulalip Tribes of Washington, Upper Skagit Indian Tribe, and U.S. Forest Service (USFS).

Background and existing information gathered from the Cultural Resources Data Synthesis will be referenced and incorporated, as appropriate, into this study.

2.4 Project Operations and Effects on Resources

Potential effects that may be associated with this undertaking include any Project-related effects associated with the day-to-day O&M of the Project and any new activity proposed under the new license. Types of effects may include direct (i.e., the result of Project activities at the same time and place with no intervening cause), indirect (i.e., the result of Project activities later in time or further removed in distance but reasonably foreseeable), and/or cumulative (e.g., caused by a Project activity in combination with other non-Project past, present, and foreseeable future activities) effects (ACHP 2019).

Section 106 of the NHPA requires federal agencies to consider direct, indirect, and cumulative adverse effects of their undertakings on historic properties. In this case, the undertaking is FERC's issuance of a new license for the Project. 36 CFR § 800.5(a)(1) states:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or

⁴ City Light invited ACHP to participate in the CRWG on March 12, 2021 via email. Mr. John Eddins, Program Analyst for Federal Permitting, Licensing, and Assistance Section, responded via email on March 15, 2021 declining to participate at this time.

association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

2.5 Study Area

The study area for this Properties with Traditional Cultural Significance Study will be the APE. Under 36 CFR § 800.16(d), the APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” Based on this regulatory definition, City Light proposes to define the APE for the suite of cultural resources studies proposed for the relicensing of the Project, consistent with FERC’s standard definition applied at other hydropower projects across the U.S.:

The APE for this undertaking includes all lands within the FERC-approved Project Boundary. The APE also includes lands or properties outside the Project Boundary where Project operations or Project-related recreation activities or other enhancements may cause changes in the character or use of historic properties, if any such properties exist.

While the APE encompasses all areas within the Project Boundary, some areas within the APE (e.g., the High Ross Inundation Zone) are not expected to be affected by the Project. City Light anticipates that Project-related visual and acoustic effects will not alter the character or use of known historic properties beyond the APE. However, City Light understands and supports Indian tribes’ and First Nations’ efforts to provide context for locations of traditional cultural importance. Accordingly, City Light will review and assess any such contextual information shared by the Indian tribes or First Nations up to one mile beyond the APE as part of the scope of this study. Such reviews will aid in evaluation of potential visual and acoustic effects to historic properties. This one-mile buffer is depicted on APE maps included in an attachment to this study plan.

City Light, as FERC’s non-federal representative for carrying out informal Section 106 consultation, is working with Section 106 consulting parties on delineating the APE. The APE is shown in Figure 2.5-1,⁵ and a detailed mapbook is attached to this study plan. The APE will be refined as needed during the study process. City Light submitted the APE to Department of Archaeology and Historic Preservation (DAHP) on March 12, 2021 for review. After further discussion with Section 106 consulting parties, City Light will submit the APE to DAHP for concurrence in accordance with 36 CFR § 800.4(a)(1). During study implementation, it is possible the relicensing process may identify Project-related activities outside of the APE that have the potential to affect historic properties, including those with traditional cultural significance. It is also possible that during relicensing, Project improvements may be proposed that are outside the original APE (e.g., recreation area improvements or modifications). If such areas are identified, the APE will be expanded to include these areas. Any updates to the APE will be described in the subsequent study report,⁵ which will be provided to Section 106 consulting parties for review and

⁵ Following the study, City Light will update the APE, as necessary, where demonstrated and reasonably anticipated Project effects have the potential to affect historic properties outside the current APE.

comment. Any revisions to the APE will be provided to Section 106 consulting parties for 30-day review period(s).

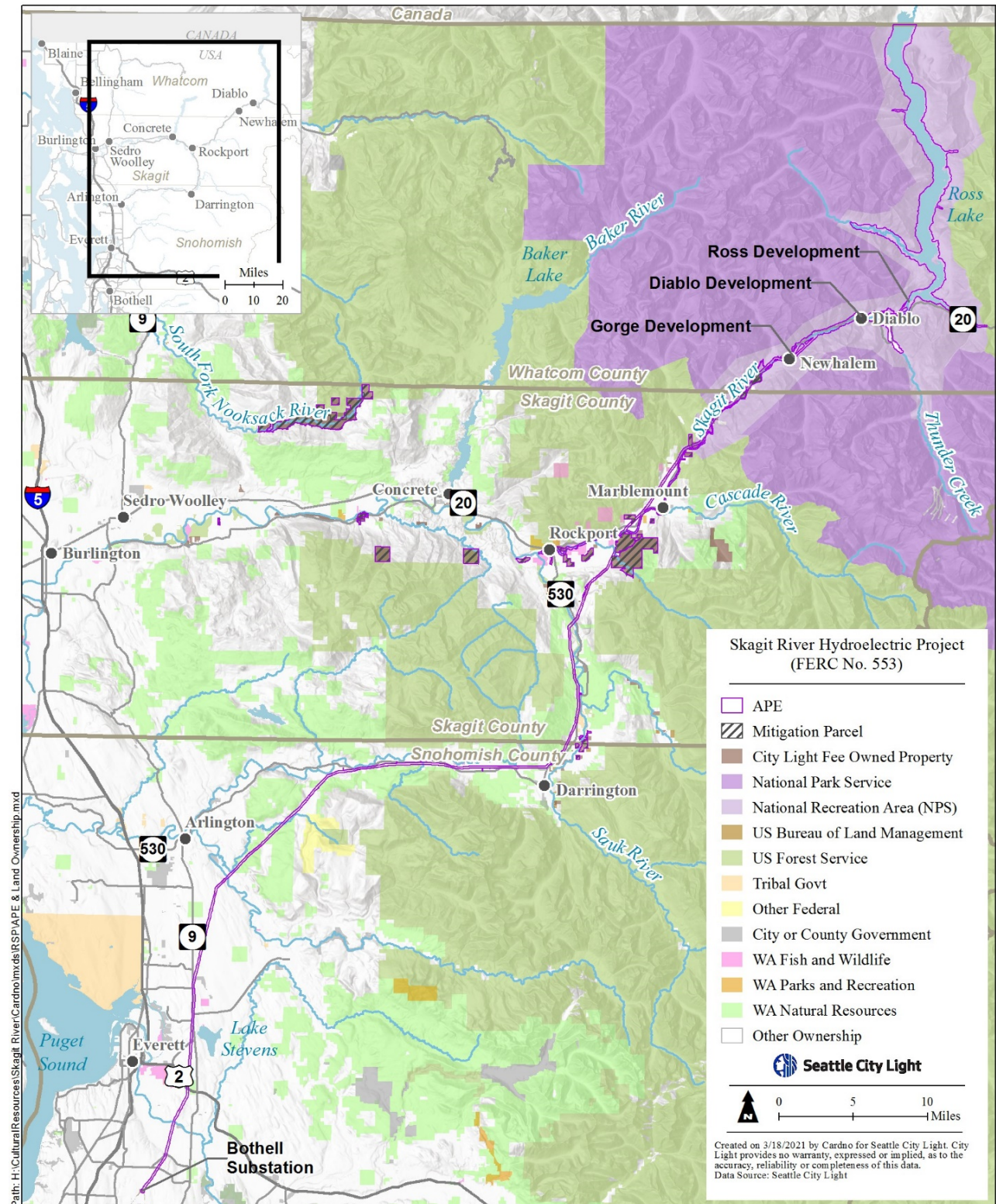


Figure 2.5-1. Location map of the Skagit River Hydroelectric Project APE.⁵

2.6 Methodology

2.6.1 General Approach and Protocols

General protocols for implementing this Properties with Traditional Cultural Significance Study include:

- (1) Activities conducted under this Study will honor and abide by the ethical and professional standards and responsibilities outlined in Appendix II of NRB 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998): Professional Qualifications: Ethnography; the Statement on Professional Ethics of the Association of American Geographers (AAG 2009), with particular attention to section V. Relations with People, Places, and Things, and sub-section C. Research Involving Indigenous Peoples, Ethnic Minorities and Other Potentially Vulnerable Groups; and the Code of Ethics (AAA 2009) and Principles of Professional Responsibility of the American Anthropological Association (AAA 2012).
- (2) Confidential information collected and managed under this study will be returned to appropriate participating Indian tribes and/or First Nations. It is necessary for limited individuals at City Light and FERC to have access to some confidential information through the study reports in order to identify historic properties within the APE and to evaluate potential project effects on them. However, City Light and their consultants will not own, have access to, or retain copies of any ethnographic source records deemed confidential without written permission from the Indian tribe and/or First Nation that shared the source records. Further, filings to FERC deemed confidential will be agreed upon in advance by the study participants, so they can be clearly identified as “privileged” and filed with FERC as confidential, non-public information.
- (3) Indian tribes and/or First Nations will be provided the opportunity to review their own information as drafted for inclusion in this study report (as described further below) prior to distribution of this study report to City Light and the Section 106 consulting parties. The purpose of this review is not only to consider the accuracy of how the information provided has been interpreted and presented, but also to consider the confidentiality of the information and how the information is disseminated. See the section below on reporting for more information.
- (4) Each Indian tribe and/or First Nations will be engaged separately for participation in this study, and the information from each will only be edited by, or at the direction of, the Indian tribe and/or First Nations from which it was provided.

As described above, City Light’s goal for this study is to identify historic properties with traditional cultural significance located within the APE, which includes those properties that are intersecting, encompassing, and/or otherwise associated with the APE, and to assess whether continued Project O&M during the next license term is adversely affecting, or has the potential to adversely affect, any such resources under the new FERC license when issued. In compliance with 36 CFR § 800.4(c)(1), City Light acknowledges “that Indian tribes and Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them.” As stated in NRB 38 (Parker and King 1998:6), “any effort to identify historic properties is to consult with groups and individuals who have special knowledge

about and interests in the history and culture of the area to be studied. In the case of traditional cultural properties, this means those individuals and groups who may ascribe traditional cultural significance to locations within the study area, and those who may have knowledge of such individuals and groups.”

Accordingly, City Light’s approach to this study is to consult and engage with Indian tribes and First Nations and to work with each group that wants to participate in this study to develop the detailed approaches, methods, and sensitivities required by each individual group in order to respect Indian tribal and First Nation knowledge sovereignty, to honor the requirements of 36 CFR § 800.4(c)(1), to apply the guidance of NRB 38 (Parker and King 1998), and to accomplish the goals and objectives of this study in good faith, as outlined above. City Light anticipates that participating Indian tribes and First Nations may already have completed similar studies they wish City Light to incorporate into this study and/or will chose to conduct their own investigations to identify historic properties with traditional cultural significance that they might share with City Light. As such, City Light foresees this study as incorporating such information provided by participating Indian tribes and First Nations in formats deemed appropriate by each community. The specific study implementation activities identified below take into account this approach.

2.6.2 Specific Study Implementation Activities

Step 1: Selection of Ethnographers. Select and hire professionals who, at a minimum, meet the ethnography qualifications outlined in NRB 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998) (herein after referred to as “ethnographer”). The selected ethnographers will implement this Properties with Traditional Cultural Significance Study. This step will include soliciting input from Indian tribes and First Nations on who they recommend for this role. The final selection and hiring will be determined by City Light.

Step 2: Tribal/First Nations Outreach. The ethnographers will conduct outreach with individual Indian tribes and First Nations. This outreach will serve to identify: (1) which Indian tribes and First Nations would like to participate in this Properties with Traditional Cultural Significance Study; (2) how each community would like to participate, including appropriate Indian tribal and First Nation protocols for research, community engagement, and collaboration; (3) what forms of ethnographic research each community deems necessary for a good faith and meaningful study; (4) processes to develop appropriate confidentiality agreements/protocols with individual communities; (5) outline information sharing protocols, including how data and information will be collected (e.g., by the participating group, by ethnographers hired by City Light, or other), transferred to the ethnographers, and used in this study; and (6) to establish iterative review protocols for draft and final reports, and how reports/information will be disseminated.

The ethnographers will develop a research design in coordination with the participating Indian tribes and First Nations that summarizes the outcome of 1-6 above. Additionally, the research design will include the methods for site visits and pedestrian surveys, if necessary, which will be developed by the ethnographers in coordination with each participating Indian tribe and First Nations. The draft research design will be reviewed by the Section 106 consulting parties, and the final research design will be filed with FERC.

Step 3: Ethnohistoric and Ethnographic Data and Information Gathering. The ethnographers will work with the individual Indian tribes and First Nations participating in this study to gather data and information they want to share and in the way they want to share it as identified in Step 2. This step may include the following types of activities, depending how each Indian tribe and First Nations wants to participate:

- Background research from available archival materials and published ethnohistoric, ethnographic, environmental references, and data from the Cultural Resources Data Synthesis;
- Review and collection of previous study efforts conducted by participating communities that was not previously accessed during the implementation of the Cultural Resources Data Synthesis;
- Ethnographic interviews;
- Site visits with representatives from participating Indian tribes and First Nations in areas of the APE experiencing Project effects or reasonably foreseeable Project effects; and
- Pedestrian field surveys in areas of the APE experiencing Project effects or reasonably foreseeable Project effects.

Step 4: Historic Properties with Traditional Cultural Significance Documentation and NRHP Evaluation. The ethnographers will assist individual Indian tribes and First Nations by:

- Working with them to identify potential properties with traditional cultural or religious significance within in areas of the APE experiencing Project effects or reasonably foreseeable Project effects;
- Considering and reviewing previous NRHP eligibility evaluations conducted by others to determine if additional evaluation efforts are needed;
- Reviewing gathered data and information, conducting additional site visits and pedestrian survey, if necessary, and identifying and documenting, as appropriate, historic properties with traditional cultural significance in areas of the APE experiencing Project effects or reasonably foreseeable Project effects;
- Applying the NRHP Criteria for Evaluation outlined at 36 CFR § 60.4 to evaluate the significance of identified properties for inclusion in the NRHP in areas of the APE experiencing Project effects or reasonably foreseeable Project effects;
- Evaluating the integrity of each significant property following the National Register Bulletin (NRB) 15 and 38; and
- Documenting these evaluations in the study reports (Step 6 below).

The integrity of properties that meet the significance requirements under one or more of the NRHP Criteria of Evaluation will be assessed pursuant to 36 CFR § 60.4, with attention to the guidance of NRB 38 for historic properties with traditional cultural significance, to confirm integrity exists for significance (Parker and King 1998), and of NRB 15 on how to apply the National Register criteria for evaluation (Andrus 1995). While the seven aspects of integrity outlined in NRB 15 consist of location, design, setting, materials, workmanship, feeling, and association, NRB 38 explains “the integrity of a possible traditional cultural property must be considered with reference

to the views of traditional practitioners; if its integrity has not been lost in their eyes, it probably has sufficient integrity to justify further evaluation” (Parker and King 1998:12). It is possible some identified properties may not have enough available information to complete NRHP eligibility evaluations, and/or be contributing elements to historic properties of traditional cultural significance where there is not enough available information to complete NRHP eligibility evaluations. These properties will remain unevaluated regarding their eligibility for inclusion in the NRHP and will be treated as if they are historic properties until or unless they are formally evaluated for the NRHP. Such unevaluated resources within the APE may be evaluated at a later date if they are affected by the Project (see Step 5), and an approach for additional inventory/evaluation will be outlined in the HPMP if feasible, appropriate, and/or necessary.

Step 5: Consider Project-Related Adverse Effects on Historic Properties with Traditional Cultural Significance. The ethnographers will work with individual Indian tribes and First Nations and will follow 36 CFR § 800.5 and NPS and ACHP guidance to preliminarily identify Project-related direct, indirect, and/or cumulative effects or potential future effects to historic properties with traditional cultural significance, as identified and documented during Steps 1-4. The ethnographers will document any treatment measures recommended by individual Indian tribes or First Nations for these properties, which will be considered by City Light in consultation with the individual communities for possible incorporation into the HPMP. These evaluations will be documented in the study report (see Step 6).

Step 6: Reporting. The ethnographers will draft one or more reports documenting the activities and the results of the activities conducted under Steps 1-5, along with the subsequent conclusions of this study. The conclusions of the study will summarize what historic properties with traditional cultural significance have been identified through the course of the study within the APE, with focused attention to confidentiality and cultural sensitivity. Additionally, any potential historic properties identified and not yet evaluated for the NRHP also will be summarized. As specified in Step 5, the conclusions will preliminarily identify Project-related direct, indirect, and/or cumulative adverse effects and potential future adverse effects to such properties, and any potential treatment identified by an individual Indian tribe or First Nations. The review and dissemination of this information, as outlined during Step 2, will be followed and reviewed during this step. It is expected that the report(s) will include multiple components with varying protocols for access and availability to Section 106 consulting parties, which will be established in Step 2. However, it is expected that a report summarizing efforts and conclusions of this study will be provided to participating Indian tribes and First Nations, City Light, FERC, and other agencies for review and comment, with subsequent submission to SHPO and/or THPO, as appropriate, for review and concurrence on any assessments of NRHP eligibility and Project effects. The summary report will then be filed with FERC in its privileged (i.e., confidential) files.

A non-confidential summary of the report findings will also be included in the Draft License Application and the Final License Application, which will be made available to the public and will be filed with FERC.

2.7 Consistency with Generally Accepted Scientific Practice

The Study methods included herein are consistent with historic property identification efforts pursuant to 36 CFR § 800.4, NRHP evaluation efforts pursuant to 36 CFR § 60.4, NRB 15, How

to Apply the National Register Criteria for Evaluation (Andrus 1995), NRB 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties (Parker and King 1998), and DAHP guidelines (DAHP 2020).

2.8 Schedule

Implementation of this Properties with Traditional Cultural Significance Study includes the six steps detailed in Section 2.6 above: (1) selection of ethnographers; (2) outreach to Tribal/First Nations; (3) gathering ethnohistoric and ethnographic data and information; (4) documentation of historic properties with traditional cultural significance and NRHP evaluation; (5) consideration of Project-related adverse effects on historic properties with traditional cultural significance; and (6) reporting. It is anticipated that this study will be completed in two years with the approximate timelines for each study step outlined below. A progress report on the study will be provided in the Initial Study Report (ISR), which will reflect any anticipated schedule modifications prior to the Updated Study Report (USR).

- Step 1 – Selection of ethnographers
 - January – April 2021
- Step 2 – Tribal/First Nations outreach
 - April – June 2021
- Step 3 – Ethnohistorical and ethnographic data and information gathering
 - May 2021 – May 2022
- Step 4 – Historic properties with traditional cultural significance documentation and NRHP evaluation
 - December 2021 – June 2022
- Step 5 – Consider Project-related adverse effects on historic properties with traditional cultural significance
 - April – August 2022
- Step 6 – Reporting
 - March 2022 – ISR
 - March 2023 – USR

2.9 Level of Effort and Cost

The budget for this study will be developed in conjunction with the research design (in Step 2). The tasks for this study would be specific to enable City Light to assess Project effects or reasonably foreseeable Project effects to historic properties with traditional cultural significance within a two-year study period, and a budget for these tasks will match that scope.

3.0 REFERENCES

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- _____. 1991b. Skagit River Hydroelectric Project No. 553: Settlement Agreement Concerning Traditional Cultural Properties Between the City of Seattle City Light Department and the Sauk-Suiattle Tribe. April 1991.
- _____. 1991c. Skagit River Hydroelectric Project No. 553: Settlement Agreement Concerning Traditional Cultural Properties Between the City of Seattle City Light Department and the Upper Skagit Tribe. April 1991.
- _____. 1991d. Skagit River Hydroelectric Project No. 553: Settlement Agreement Concerning

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**INVENTORY OF HISTORIC PROPERTIES WITH TRADITIONAL
CULTURAL SIGNIFICANCE
REVISED STUDY PLAN**

ATTACHMENT A

**CITY LIGHT RESPONSES TO LP COMMENTS ON THE STUDY PLAN
PRIOR TO PSP**

Table 1. City Light responses to LP comments on the study plan prior to PSP.

No.	Commenting Individual (Organization)	Date	Study Plan Section	Comment	Response
1.	Pauline Douglas (NNTC)	10/29/2020 (written letter received via email 11/30/2020 from NNTC)	Section 2.6.2 Specific Study Implementation Activities	Verbal comments regarding hiring multiple ethnographers with Section 106 of the NHPA experience from the US. Additionally, incorporation of ethnographer to accompany survey crew at selected locations to advise on NRHP eligibility documentation.	Study plan updated in Section 2.6.2 Step 1 to include multiple ethnographers with experience in evaluating NRHP eligibility. Added the following to Step 4: field visits by ethnographer at selected locations to advise on NRHP eligibility documentation when/where needed.
2.	Pauline Douglas (NNTC)	10/29/2020 (written letter received via email 11/30/2020 from NNTC)	Section 2.6.2 Specific Study Implementation Activities	Verbal comments regarding conducting field survey and schedule.	Study plan updated in Section 2.6.2 Step 4 to clarify that field survey can occur as part of data collection and NRHP evaluation. Also adjusted the fieldwork schedule to start earlier in 2021 to allow for survey during the Ross Lake drawdown.
3.	Pauline Douglas (NNTC)	10/29/2020 (written letter received via email 11/30/2020 from NNTC)	Section 2.6.2 Specific Study Implementation Activities	Verbal comments regarding evaluating resources for NRHP eligibility.	Study plan updated in Section 2.6.2 Step 4 to clarify evaluation of significance and integrity.
4.	Kim Dizenzo (NPS)	11/12/2020	Section 1.3 Study Plan Development	Might be worth it to go into a little more detail on what types of info is protected. Specifically go into detail with RCW and TCPs. In federal law, the site has to be eligible for the NR where as that's not the case for state law.	This is consistent with other study plans. Further details about confidentiality can be included in the research design, which will be developed in Step 2 of the study.
5.	Kim Dizenzo (NPS)	11/12/2020	Section 2.6.2 Specific Study Implementation Activities	Step 1 and 2 seem backwards. If you're allowing tribes to choose the ethnographer, then the outreach to see who wants to participate should happen first so they can select ethnographer.	Step 1 includes soliciting input from Indian tribes and First Nation communities on who they recommend for ethnographers. The outreach under Step 2 is for the ethnographers to begin working with the participating communities.
6.	Kim Dizenzo (NPS)	11/12/2020	Section 2.6.2 Specific Study	Does this need to include a little more detail? Maybe just stating that these are written	Bullets revised for clarity – evaluation of significance and integrity, and evaluations will

Properties with Traditional Cultural Significance Revised Study Plan

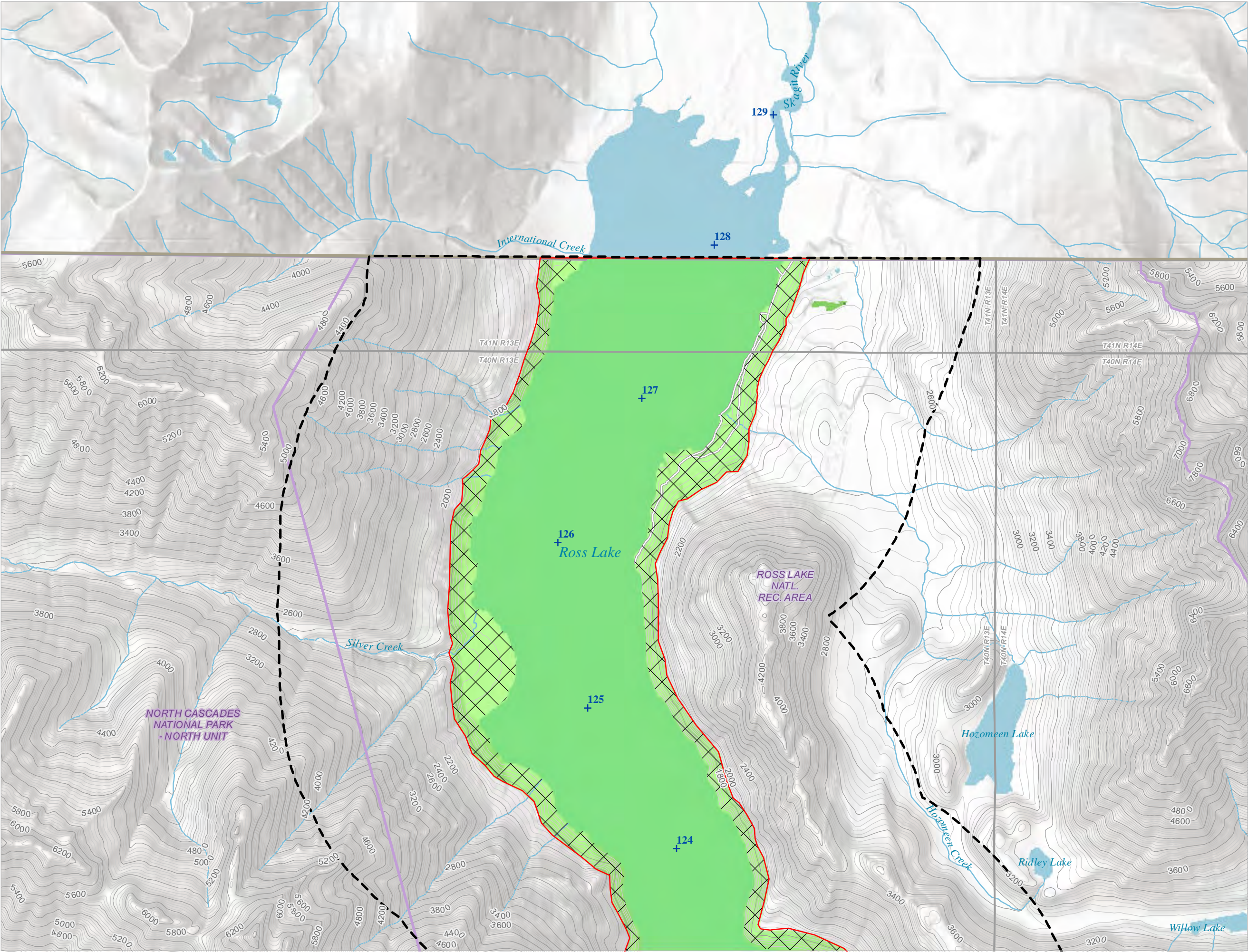
No.	Commenting Individual (Organization)	Date	Study Plan Section	Comment	Response
			Implementation Activities	documents that analyze each of these bullets for the TCP?	be documented in study reports, which are prepared as part of Step 6.
7.	Kim Dicenso (NPS)	11/12/2020	Section 2.6.2 Specific Study Implementation Activities	However, only eligible or listed properties will see mitigation efforts (???). Or are there circumstances that SCL will manage and mitigate unevaluated TCPs?	This follows 36 CFR § 800.5, whereby adverse effects will be evaluated for historic properties (those resources that are eligible for or listed in the NRHP), and 36 CFR § 800.6 for the resolution of adverse effects (avoid, minimize, mitigate). If TCPs are unevaluated, they will remain as such unless they are being affected by the project, and would then go through the process outlined in 36 CFR § 800.4 – 800.6.

**INVENTORY OF HISTORIC PROPERTIES WITH TRADITIONAL
CULTURAL SIGNIFICANCE
REVISED STUDY PLAN**

ATTACHMENT B

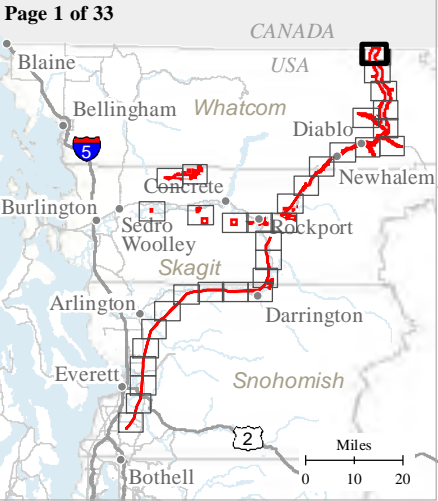
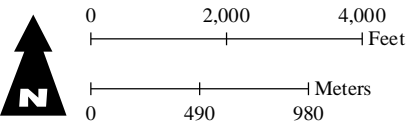
AREA OF POTENTIAL EFFECTS MAPBOOK

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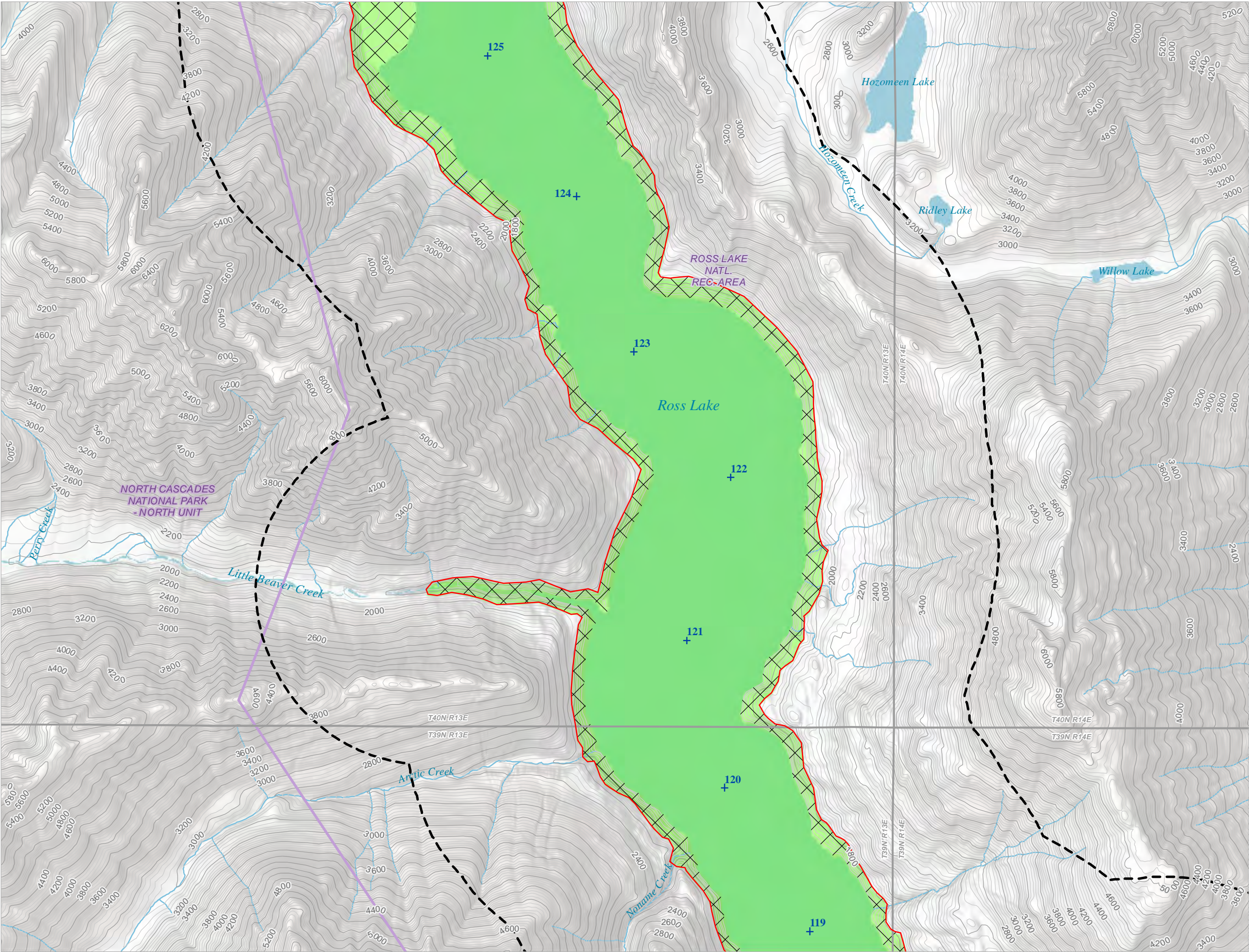
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 - 1-mile Buffer for Potential Acoustic / Visual Effects



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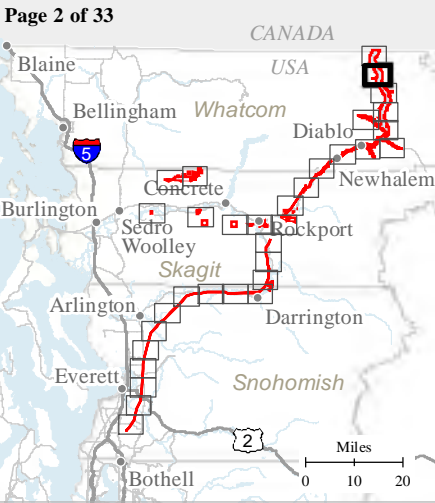
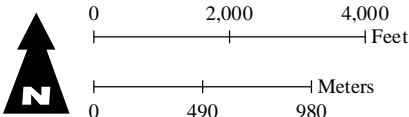
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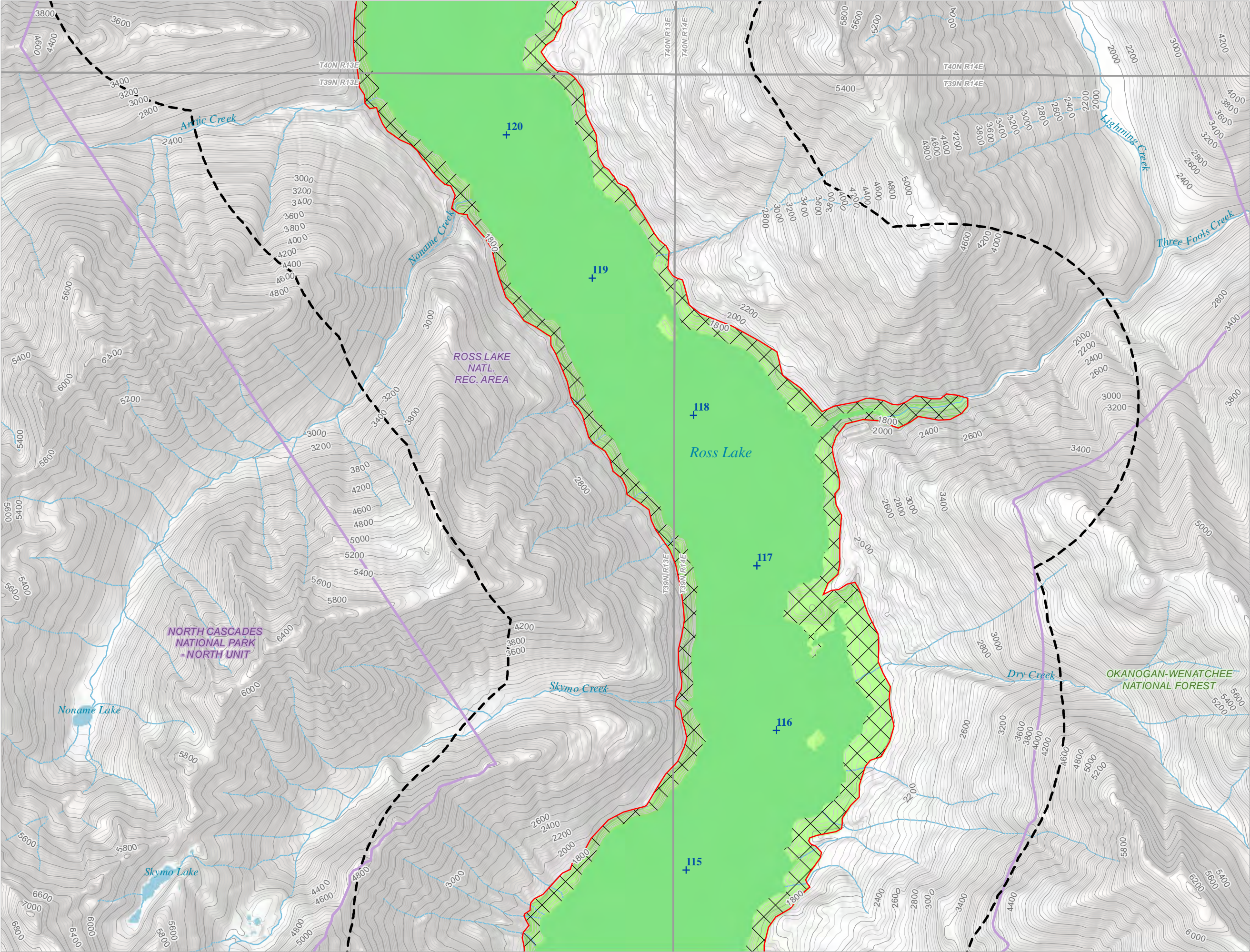
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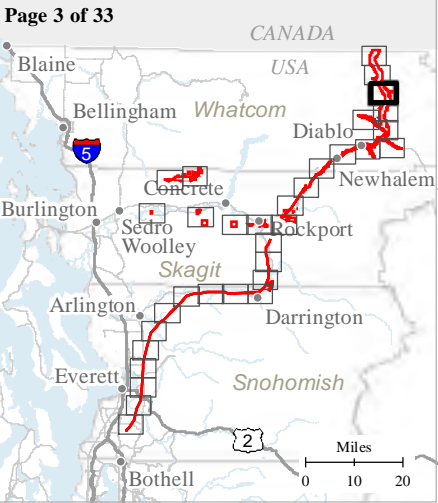
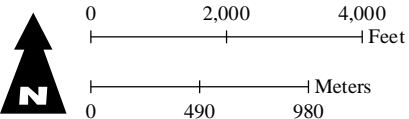
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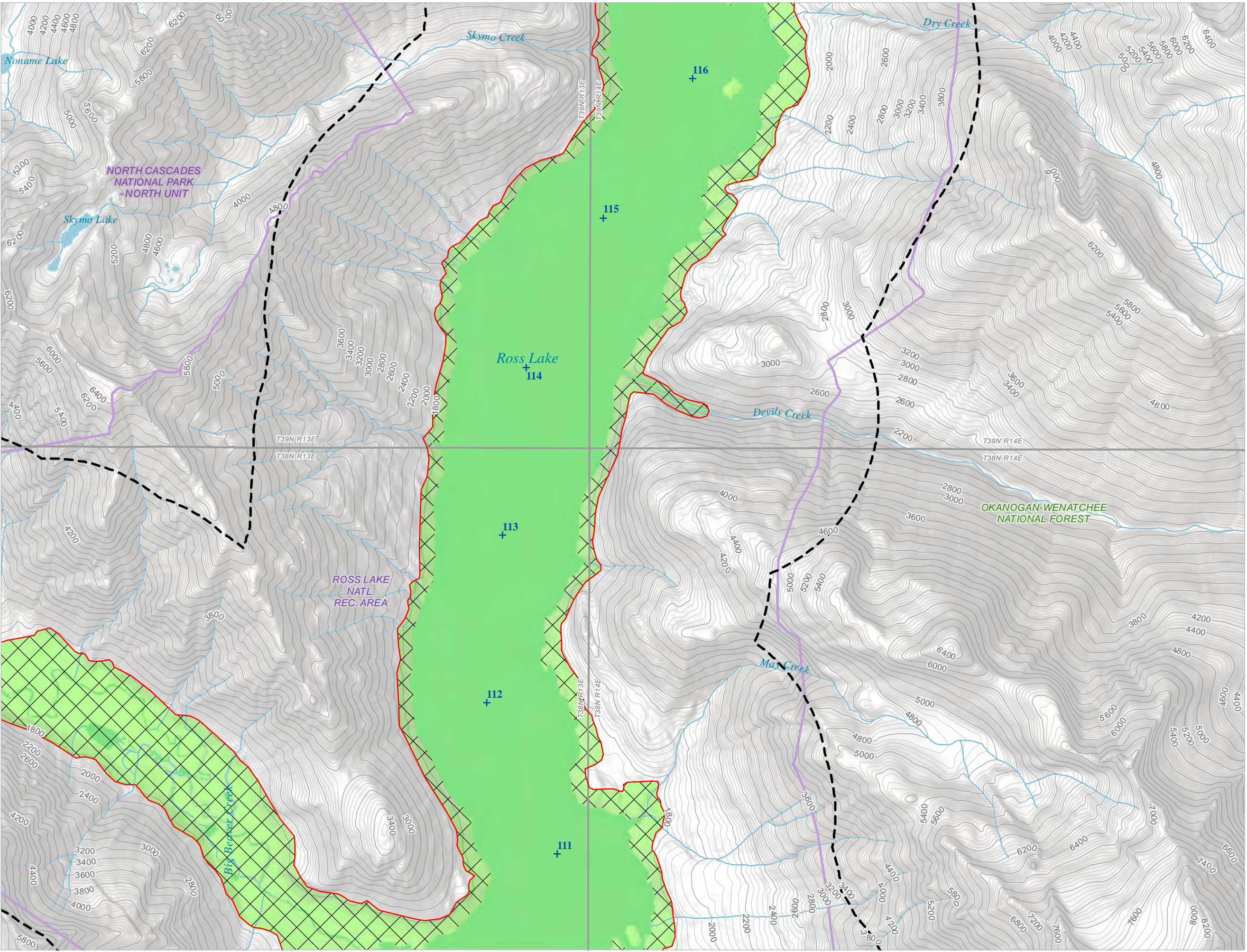
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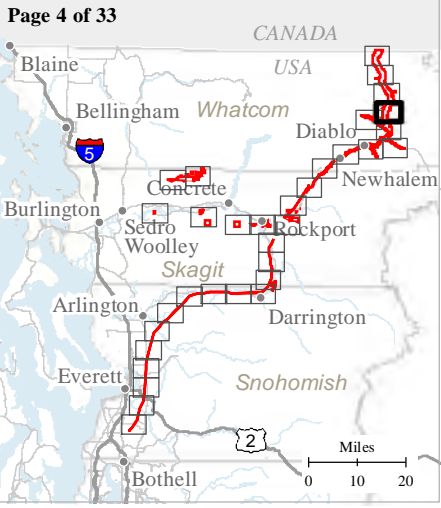
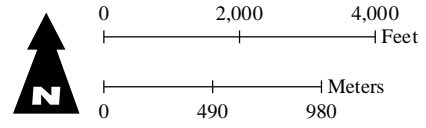
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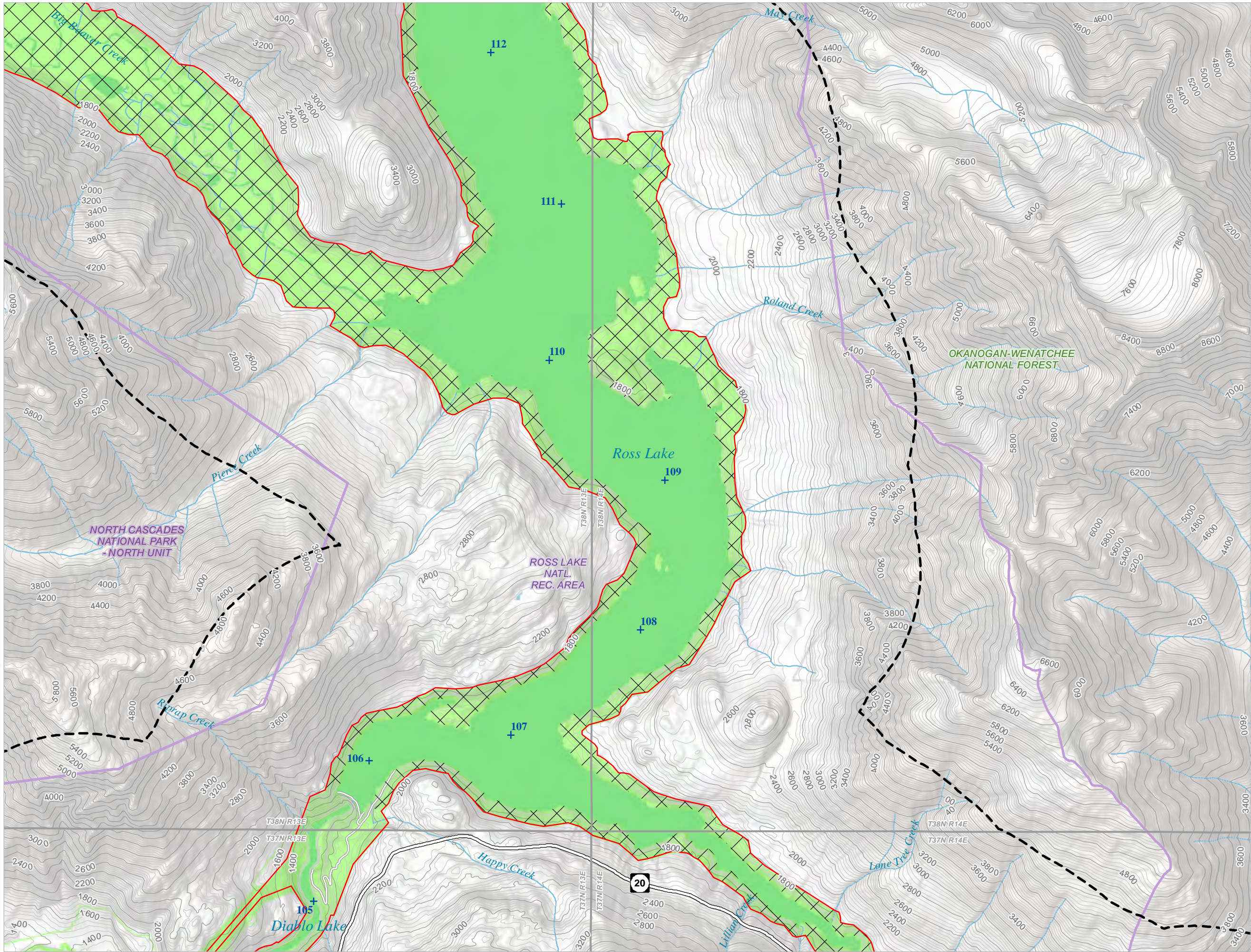
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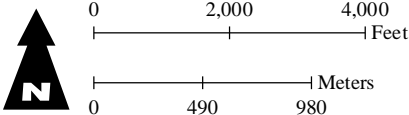
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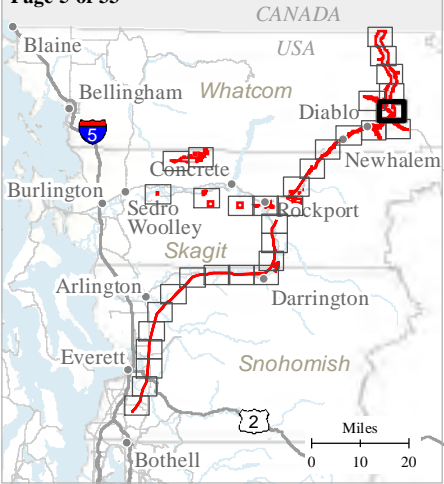
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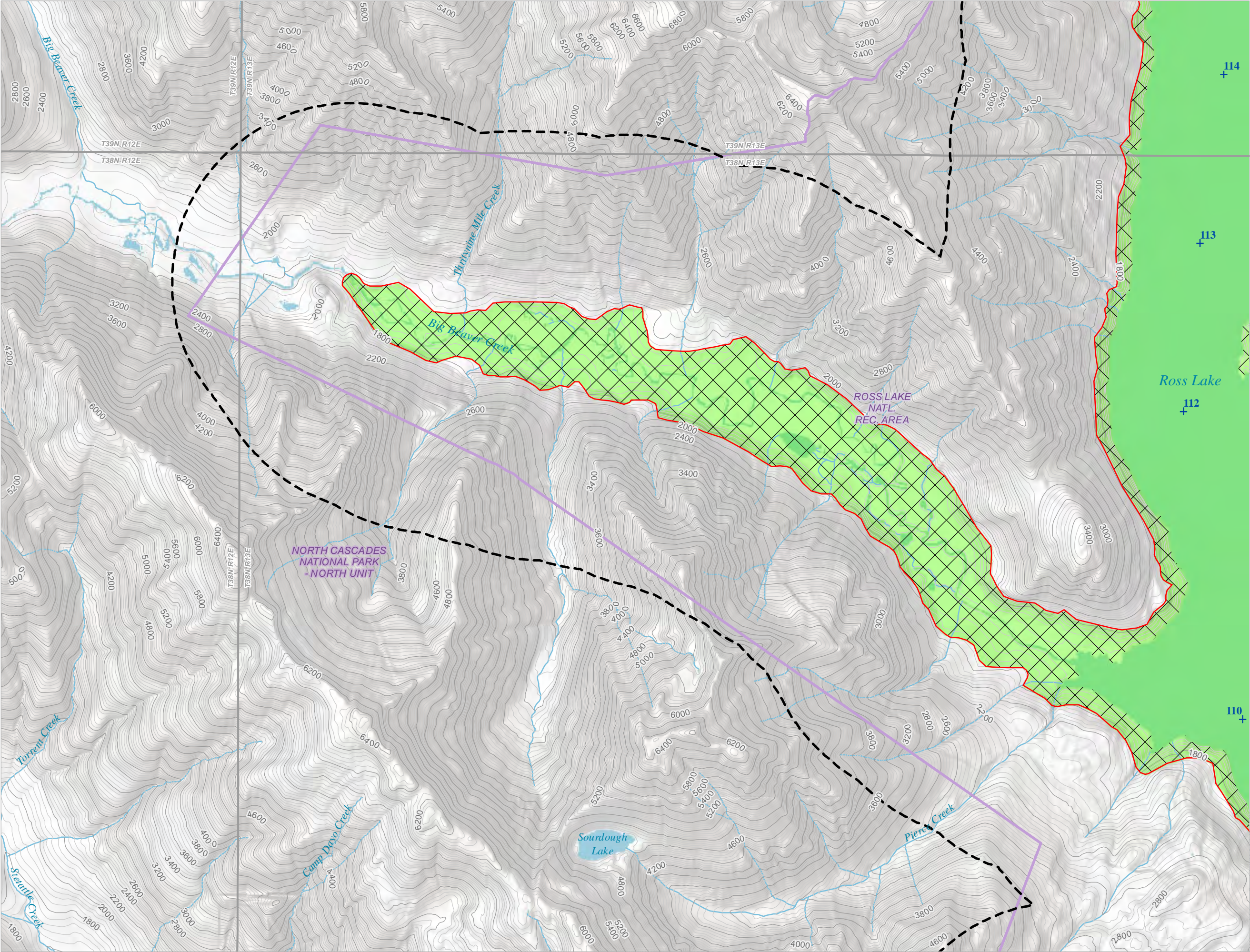


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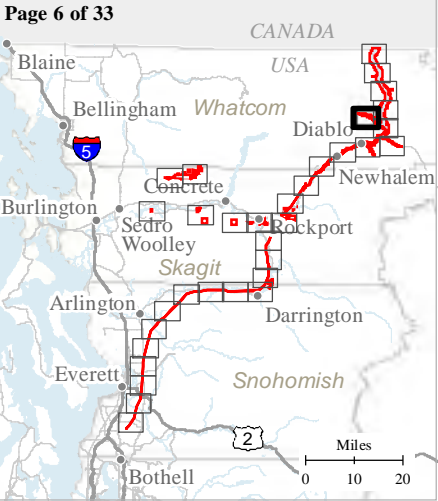
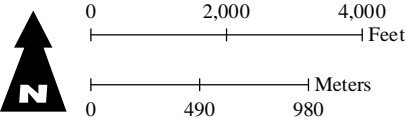
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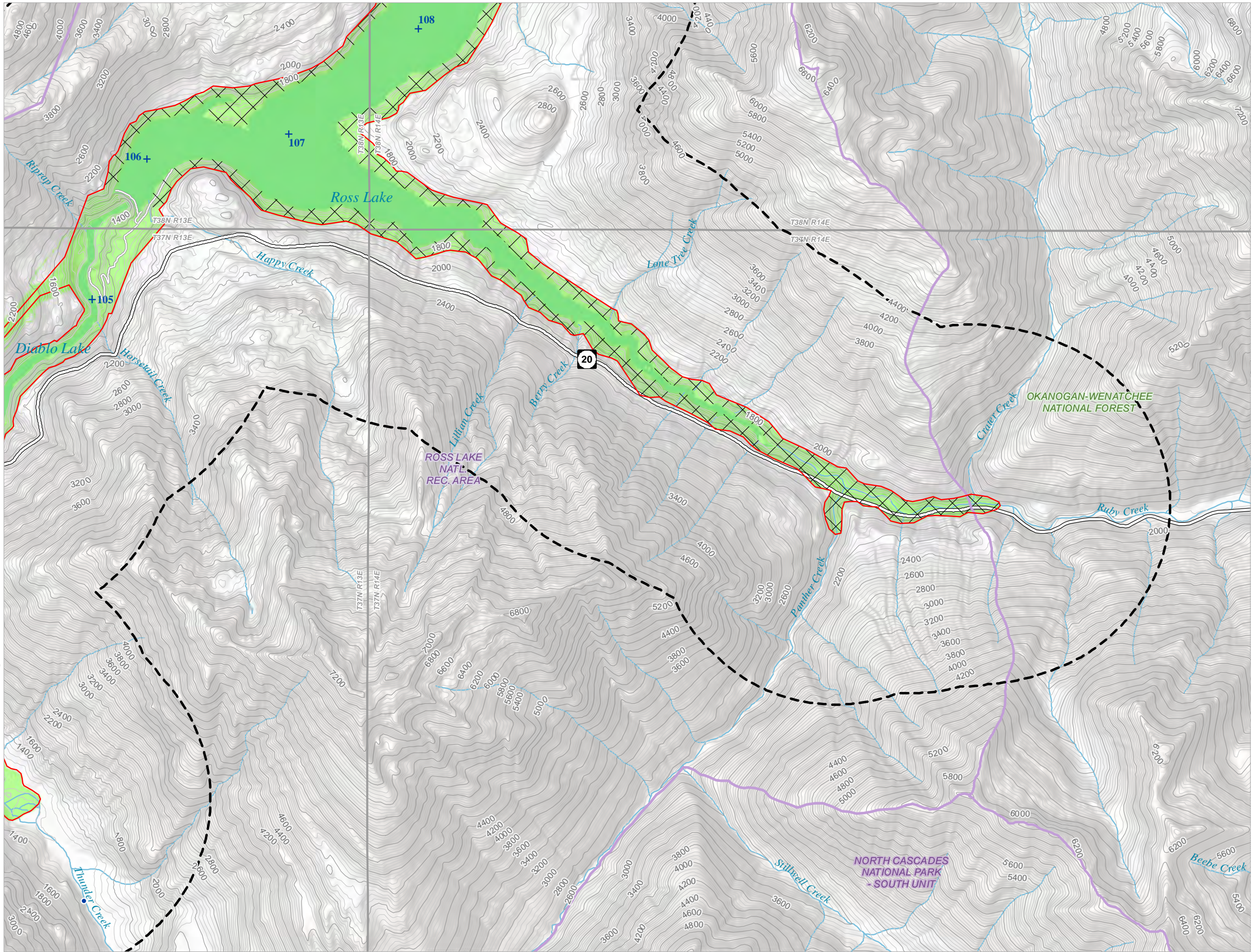
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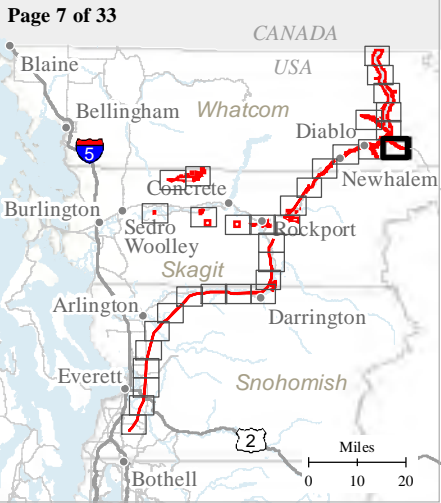
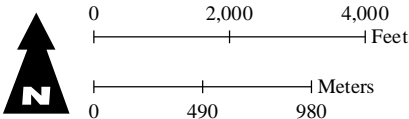
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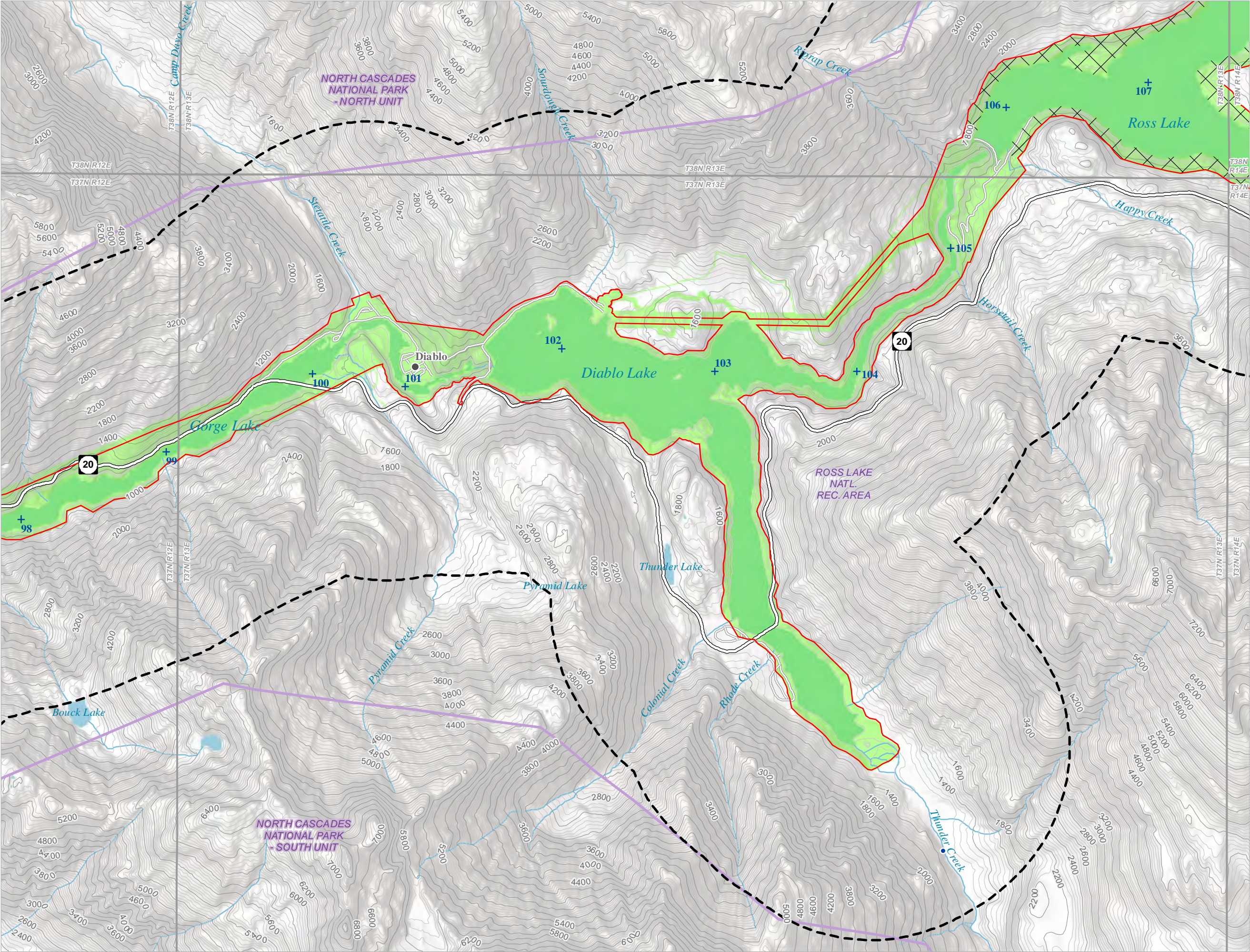
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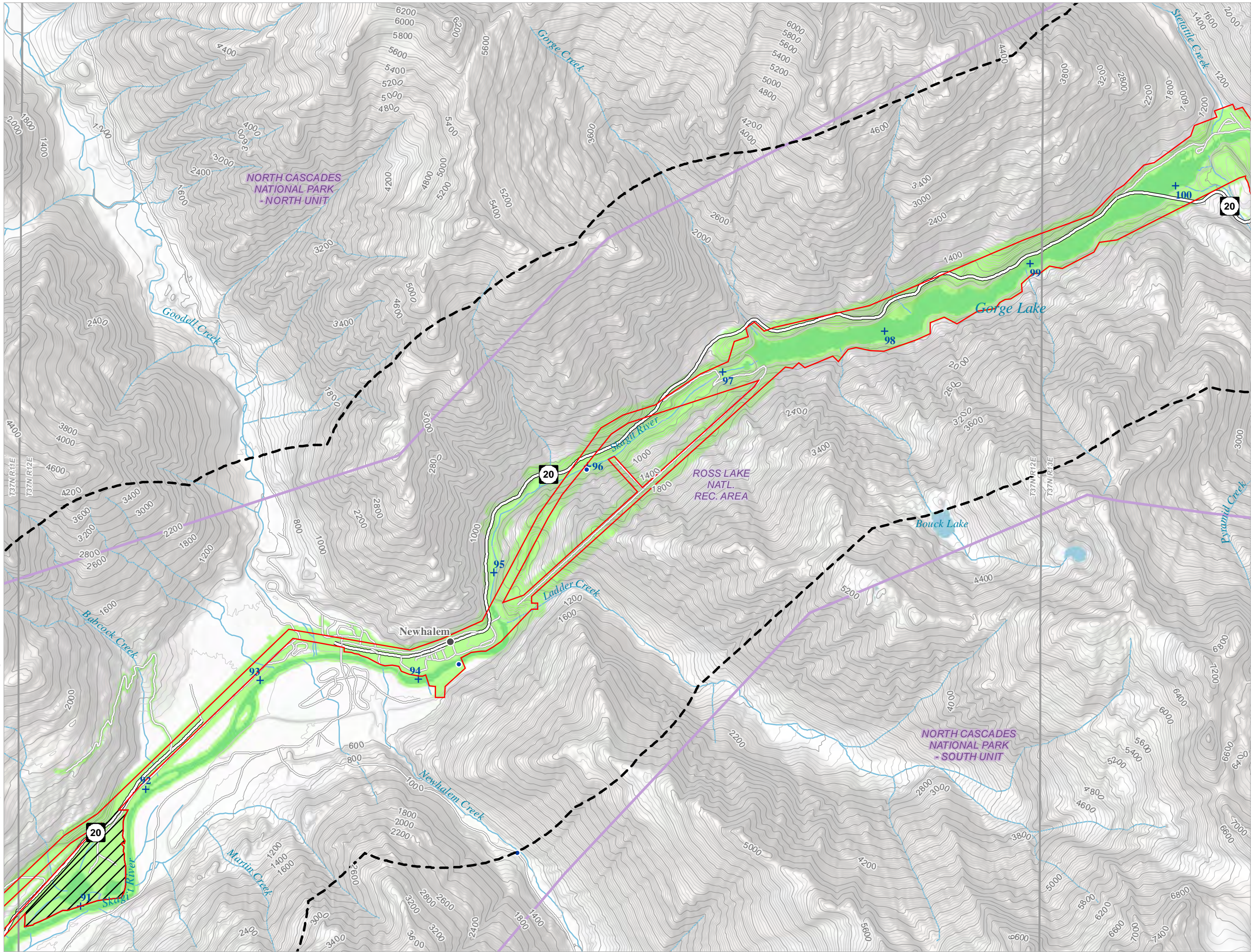
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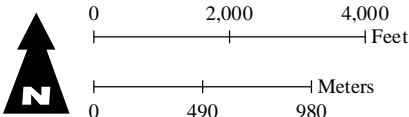
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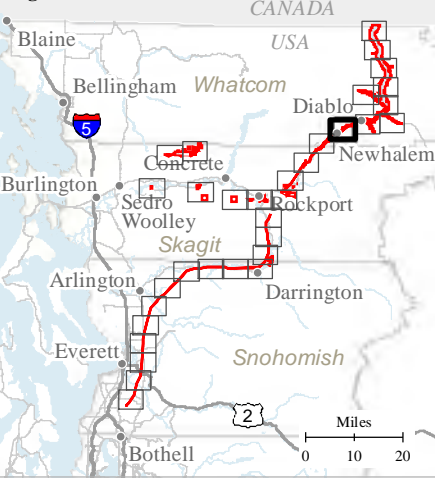
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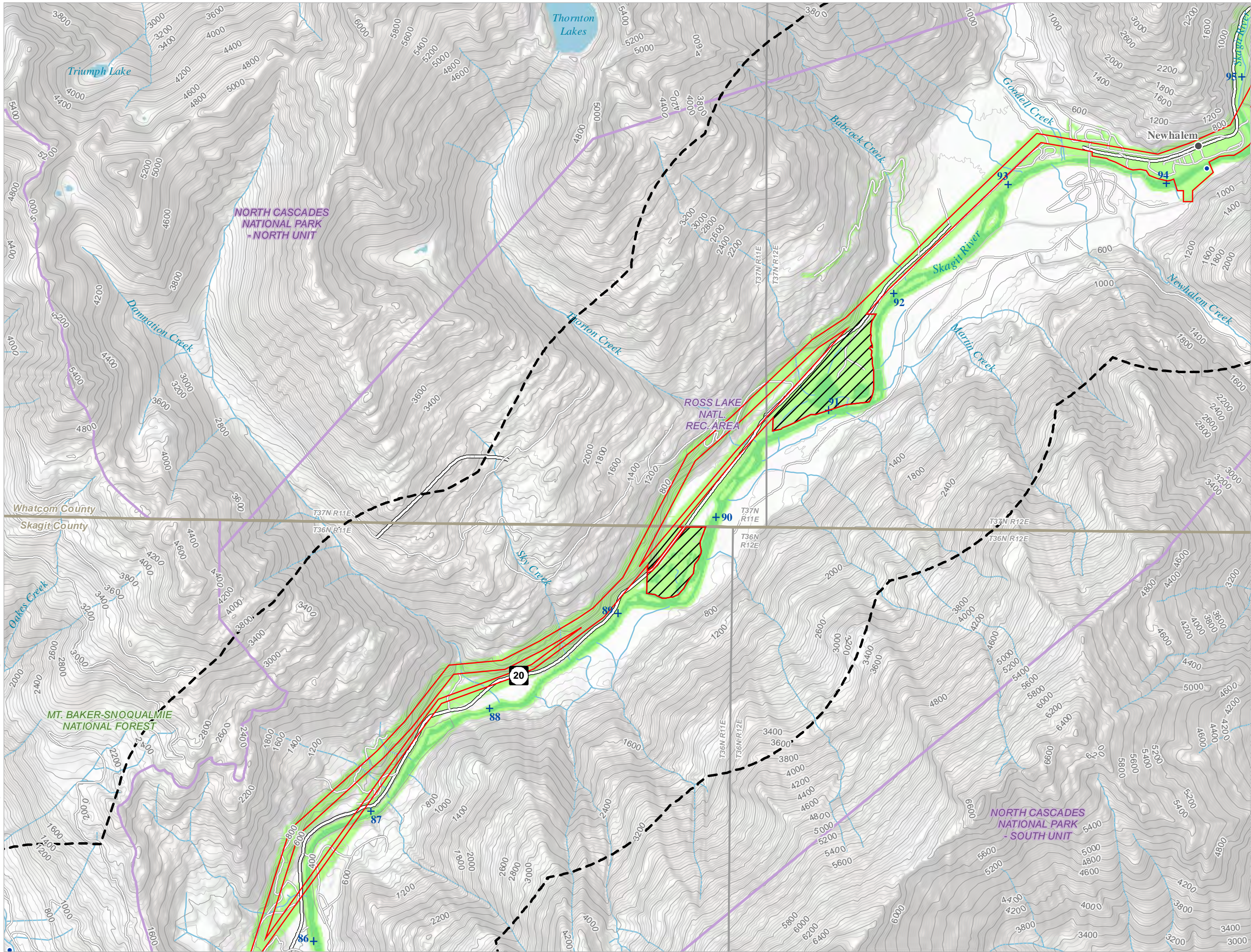
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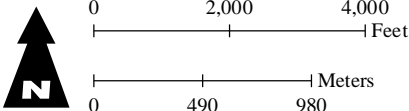
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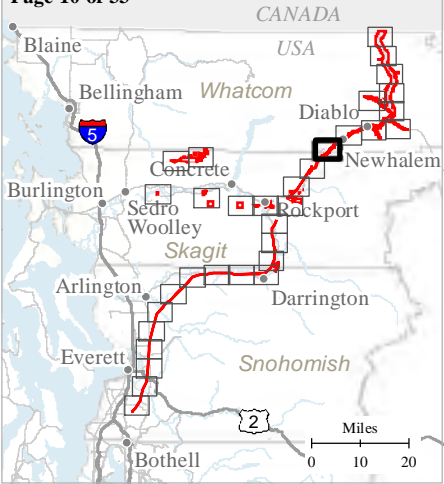
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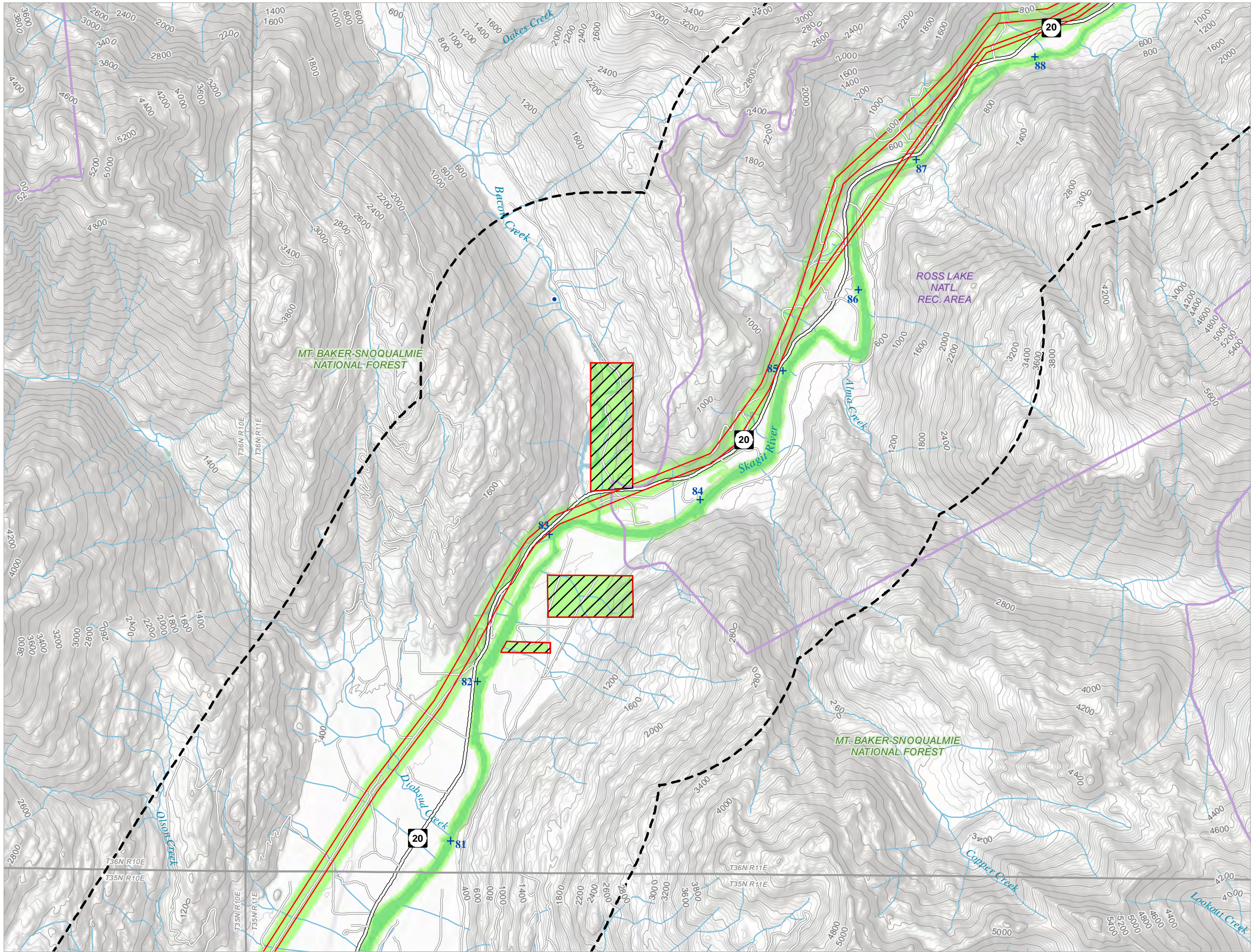
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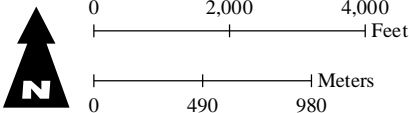
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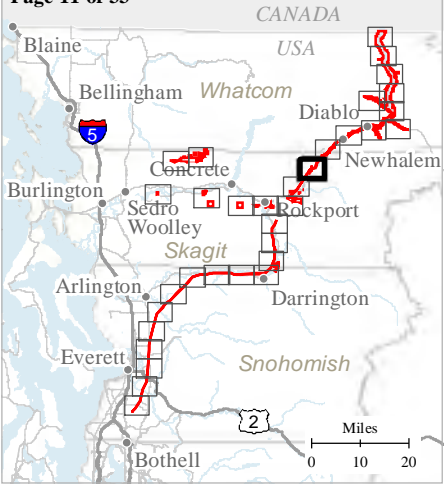
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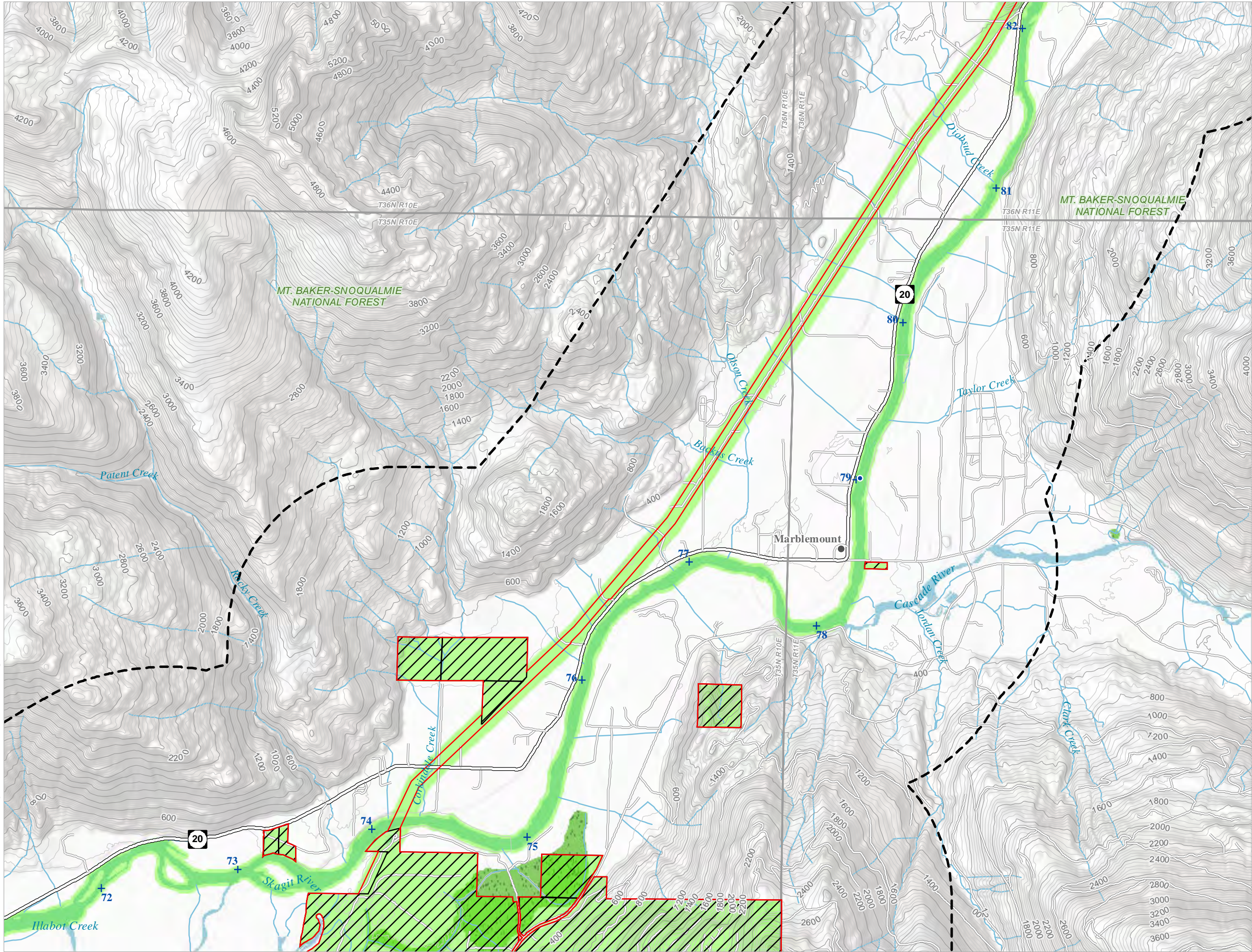


 **Seattle City Light**

**SKAGIT RIVER HYDROELECTRIC
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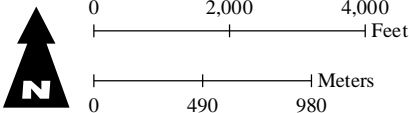
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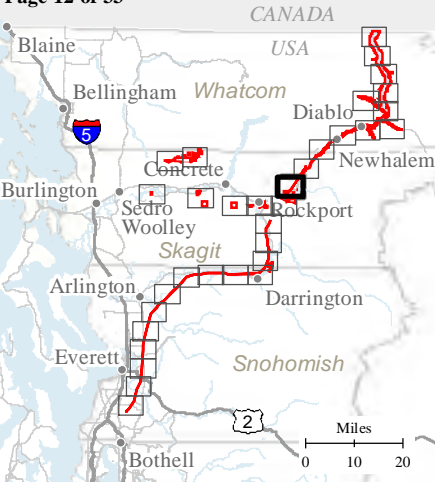
APE MAPBOOK

Legend

- FERC Project Boundary
- + Project River Mile (PRM)
- APE
- Mitigation Parcel
- 1-mile Buffer for Potential Acoustic / Visual Effects



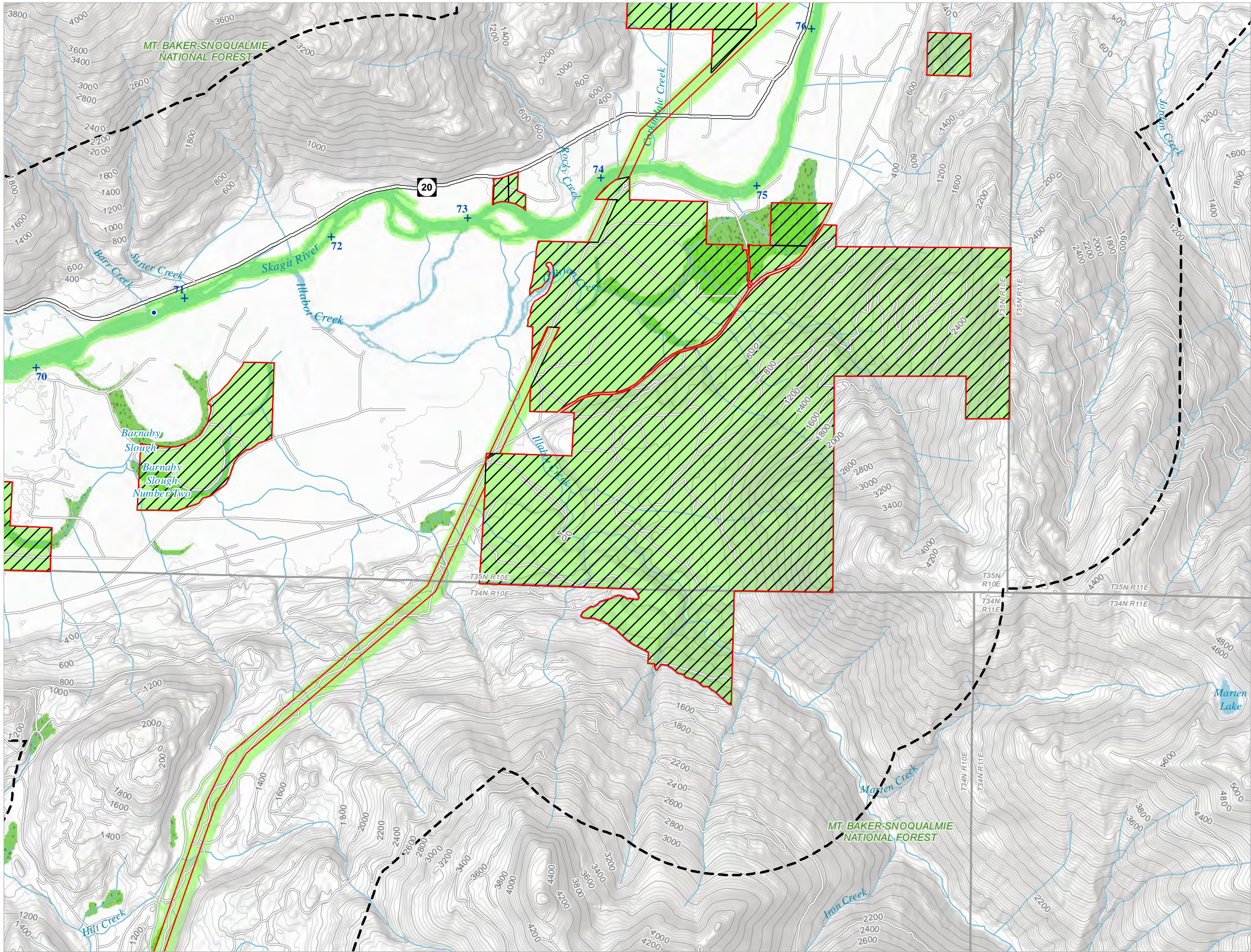
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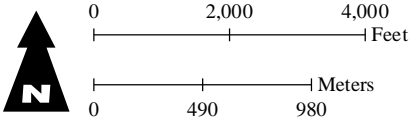
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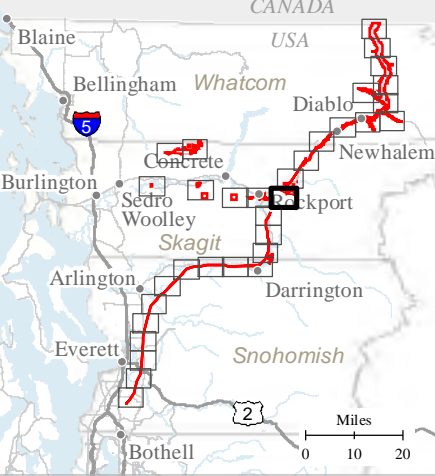
APE MAPBOOK

Legend

- FERC Project Boundary
- Project River Mile (PRM)
- APE
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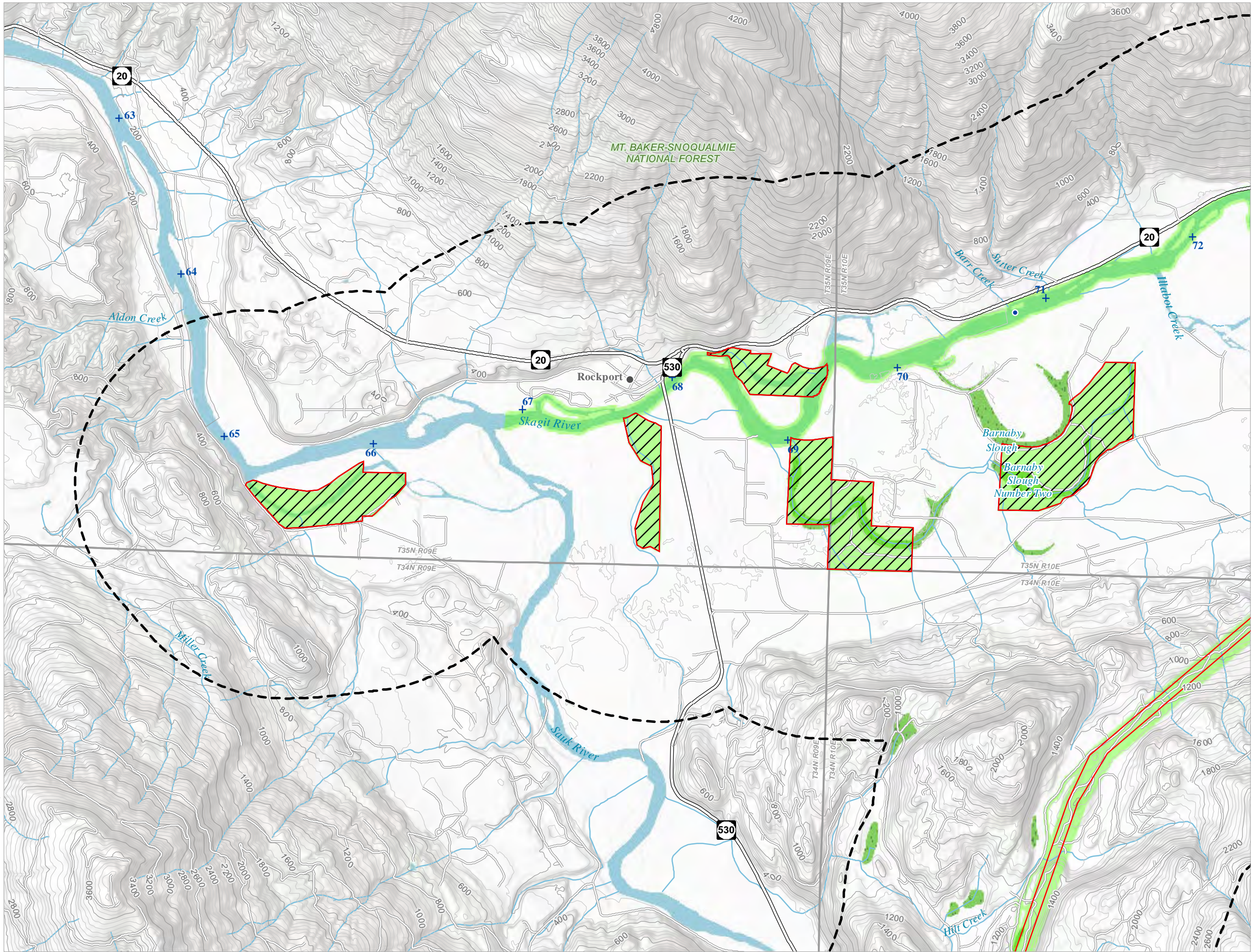
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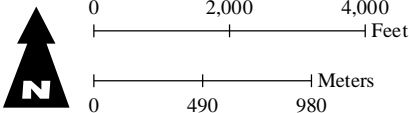
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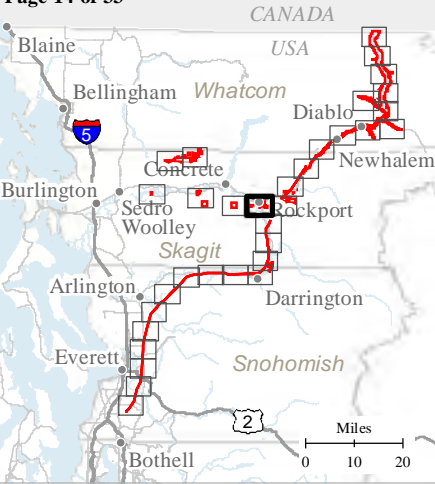
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Legend

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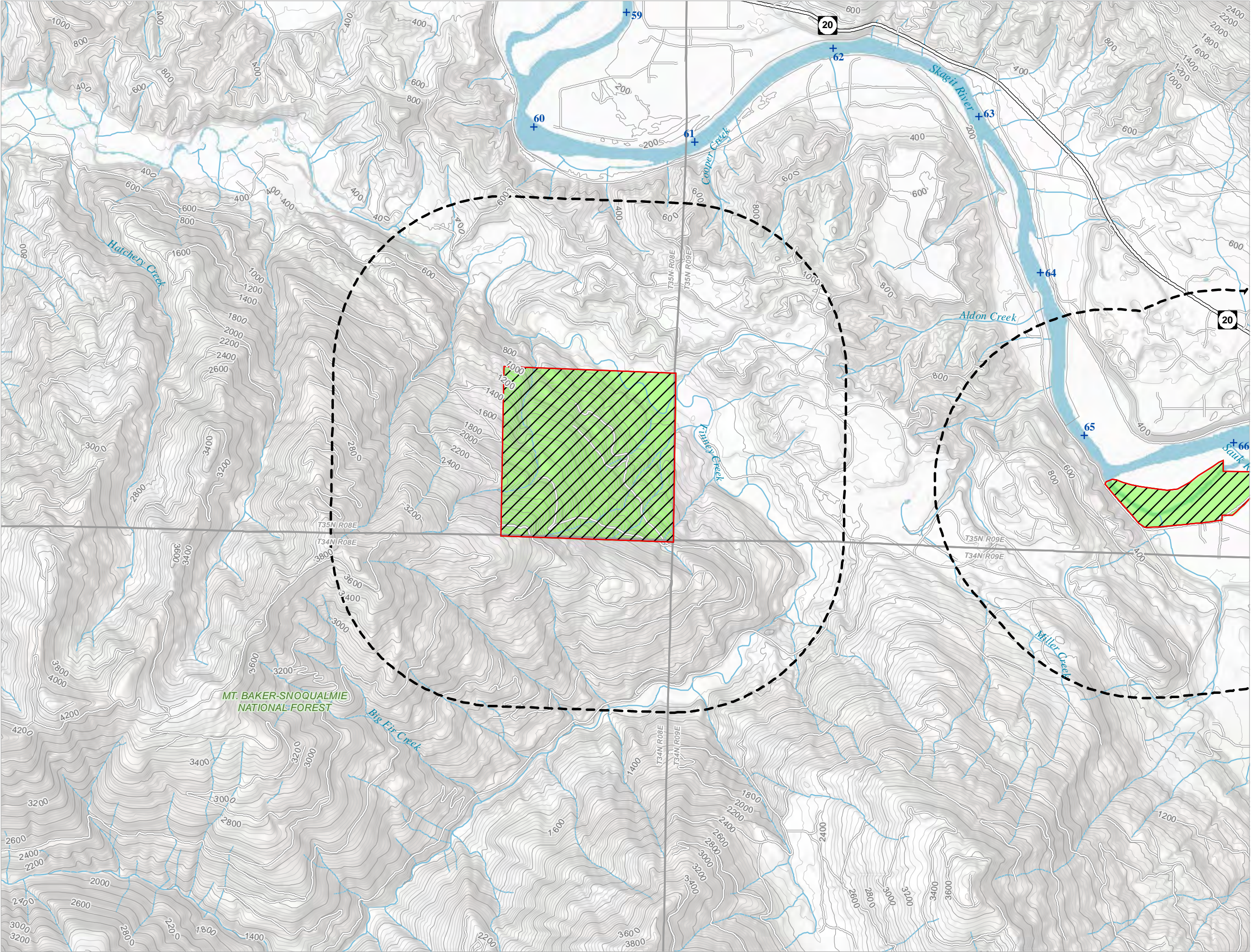
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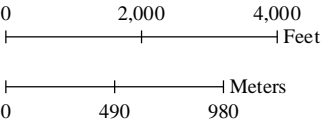
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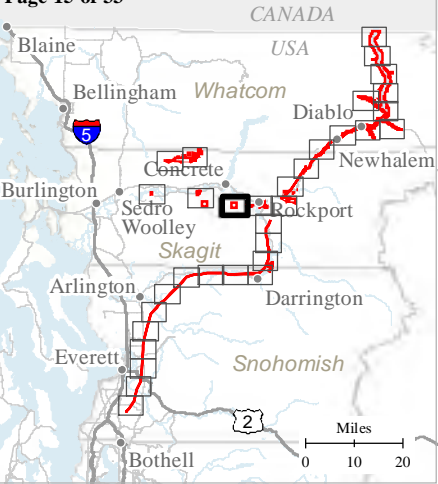
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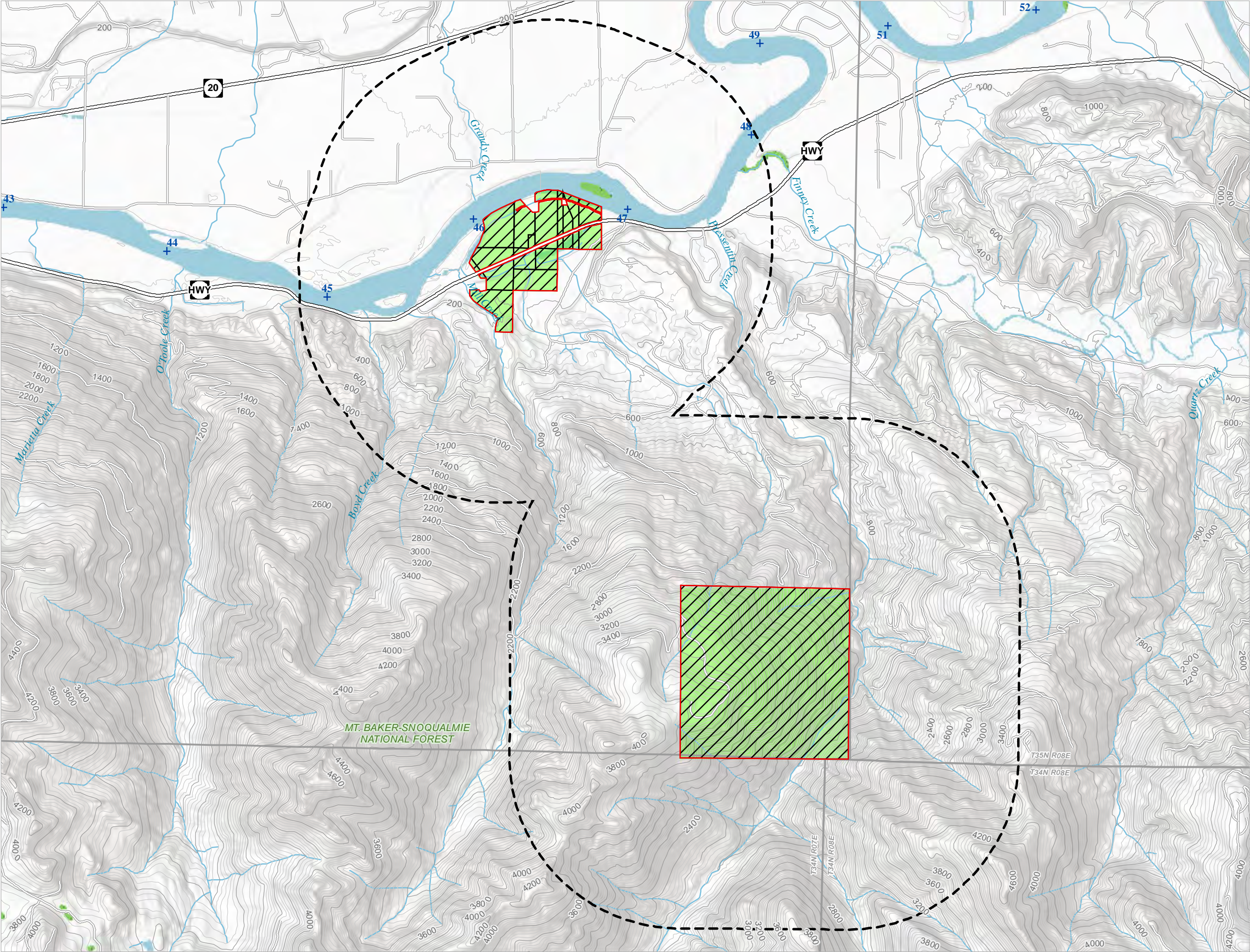
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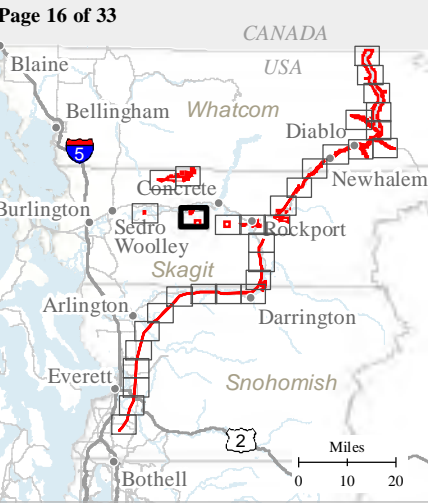
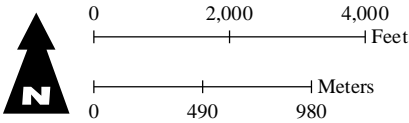
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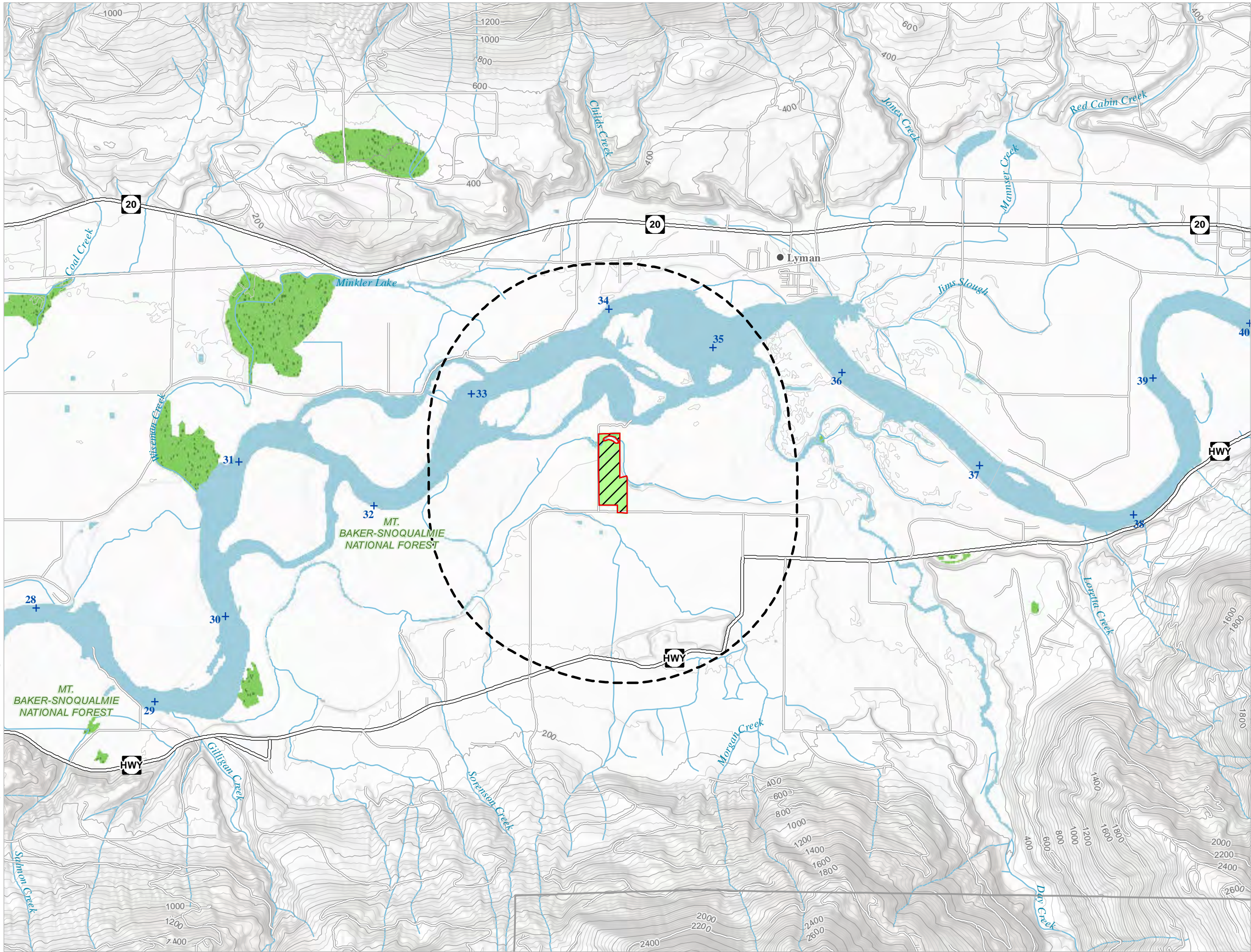
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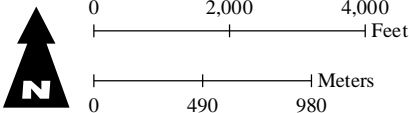
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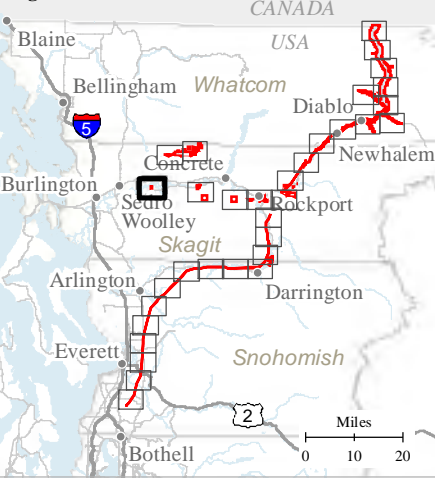
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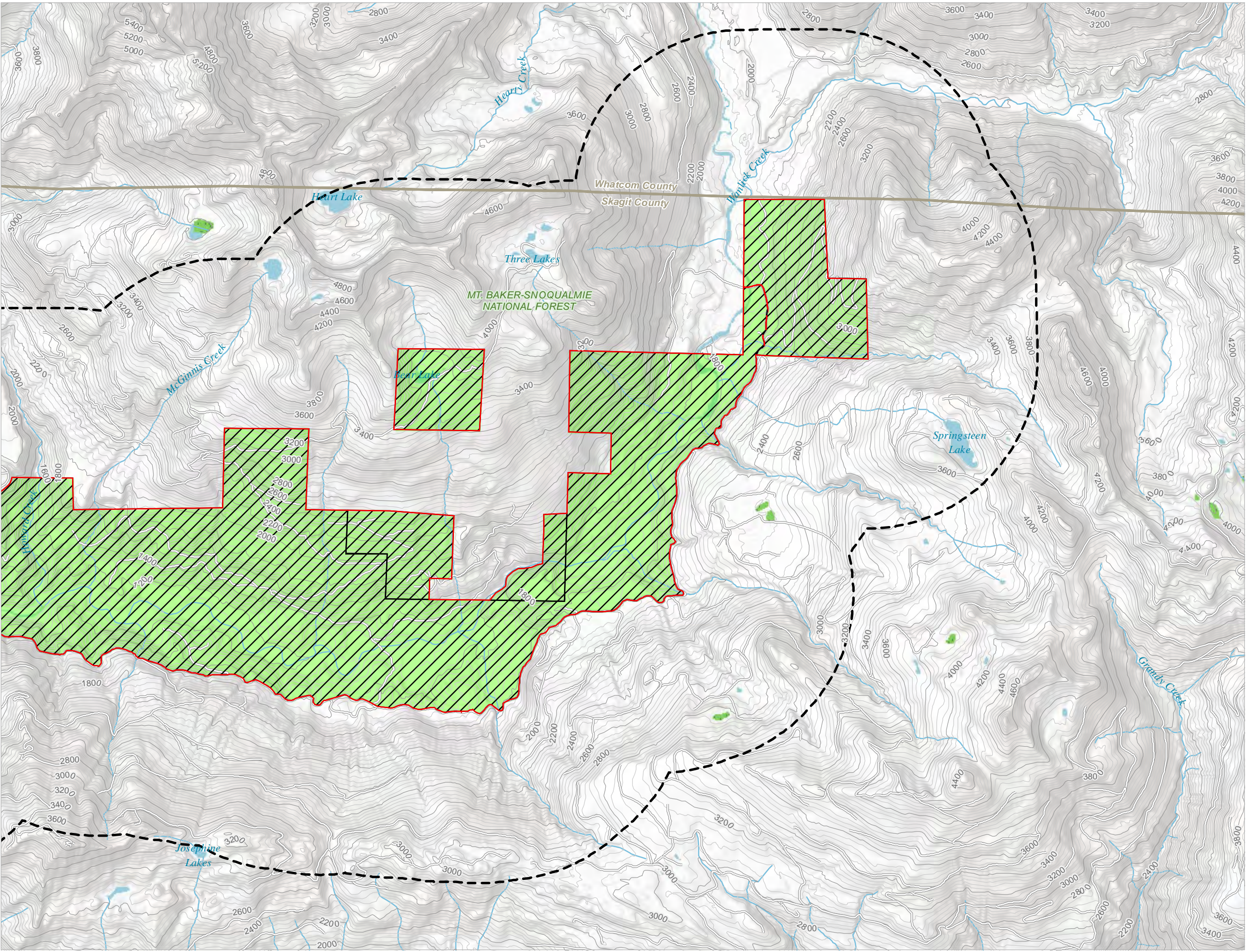
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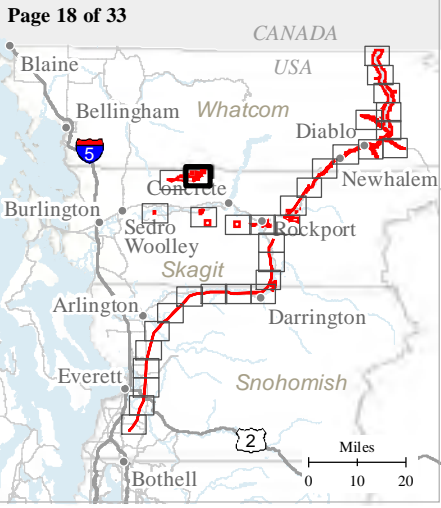
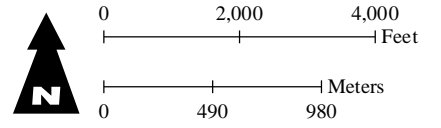
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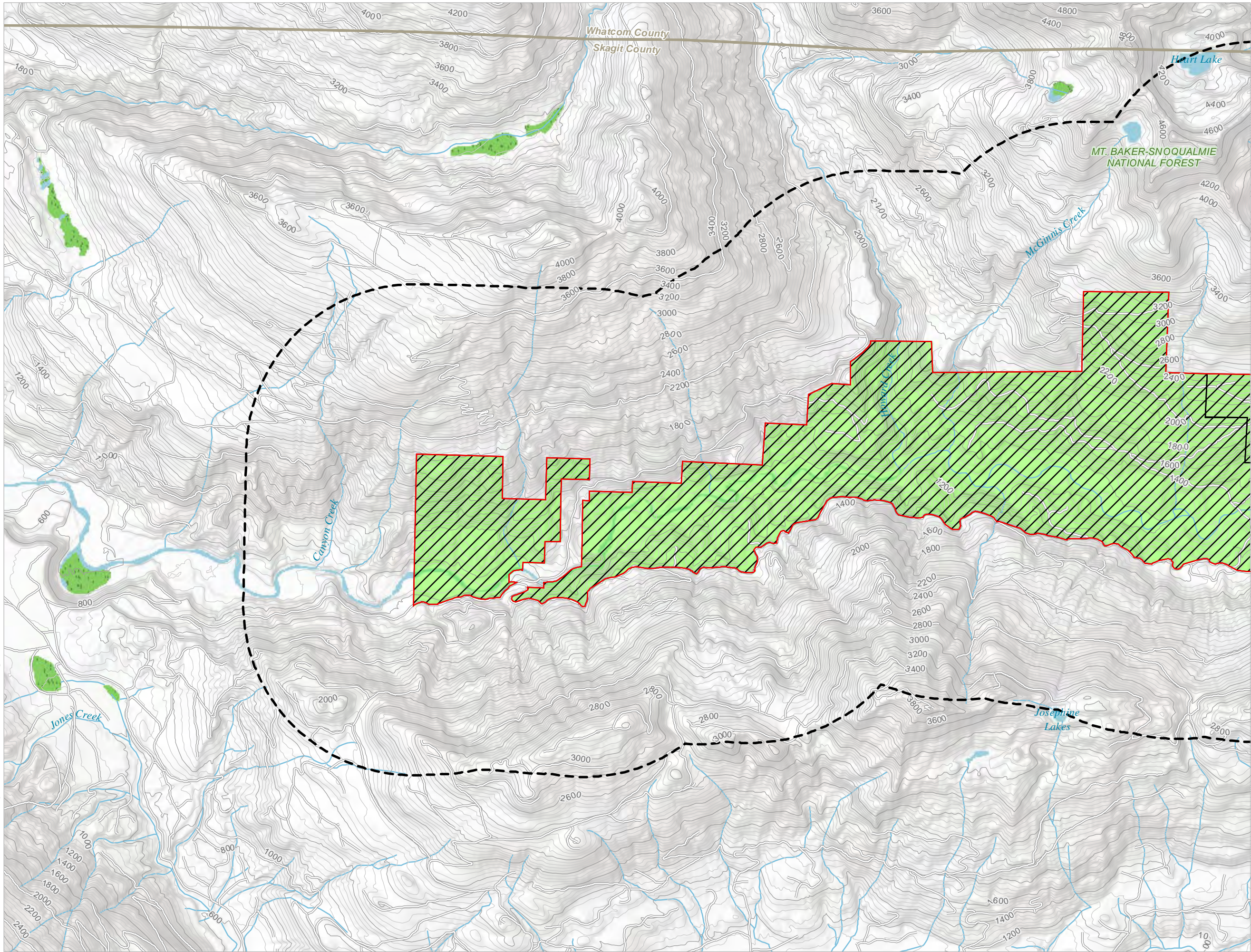


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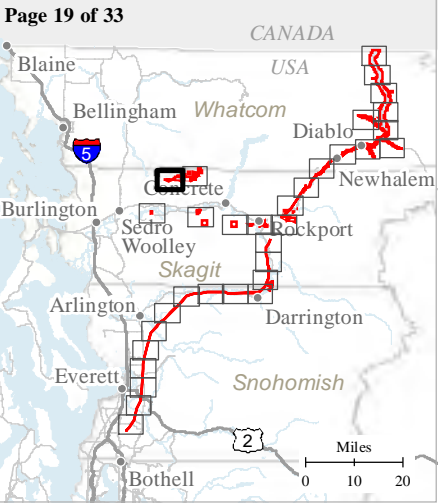
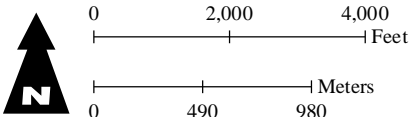
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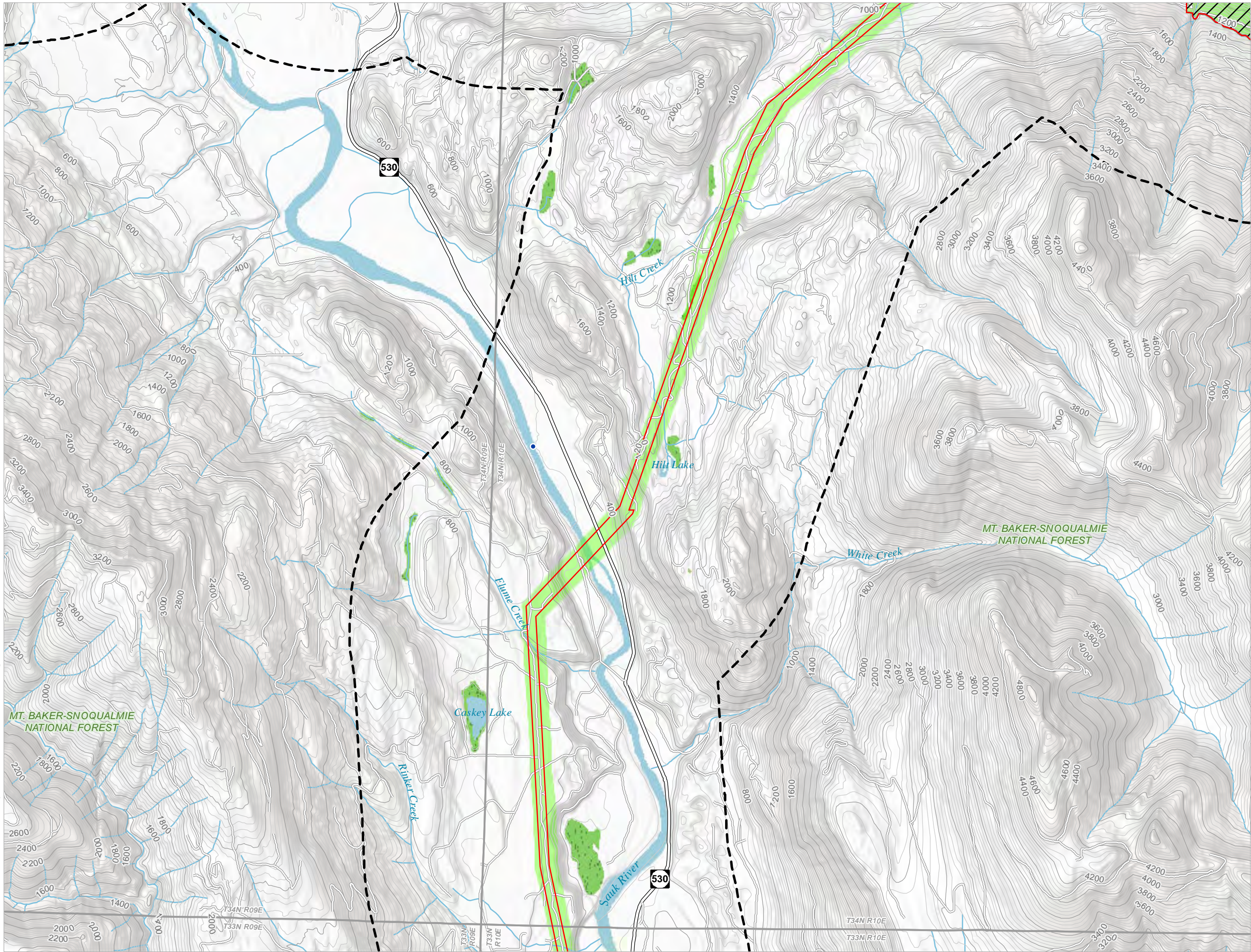
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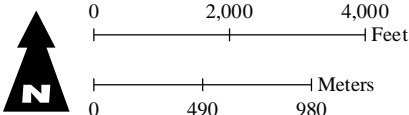
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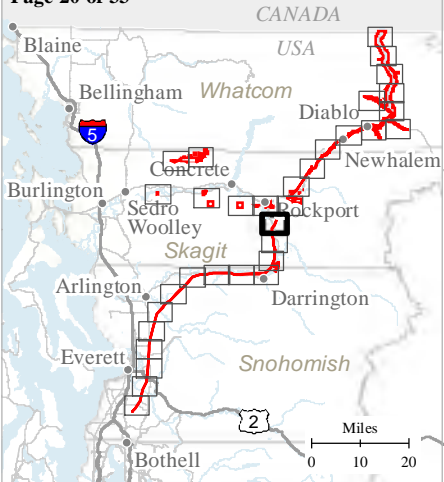
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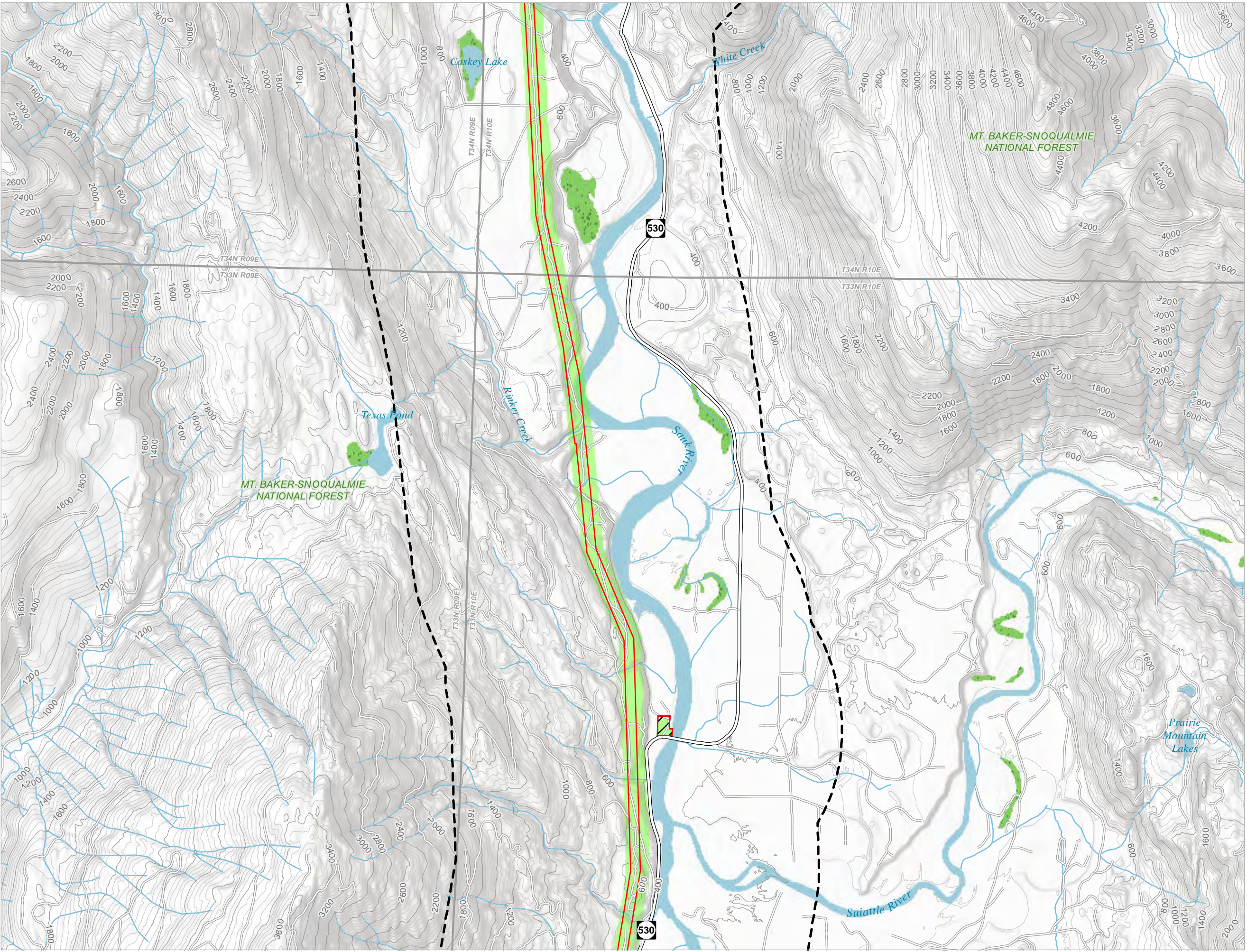
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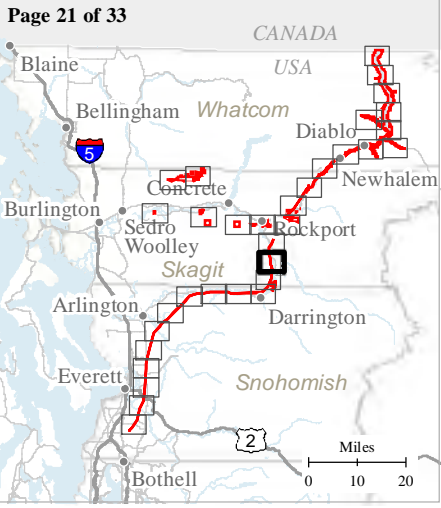
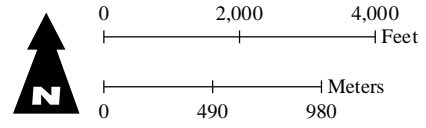
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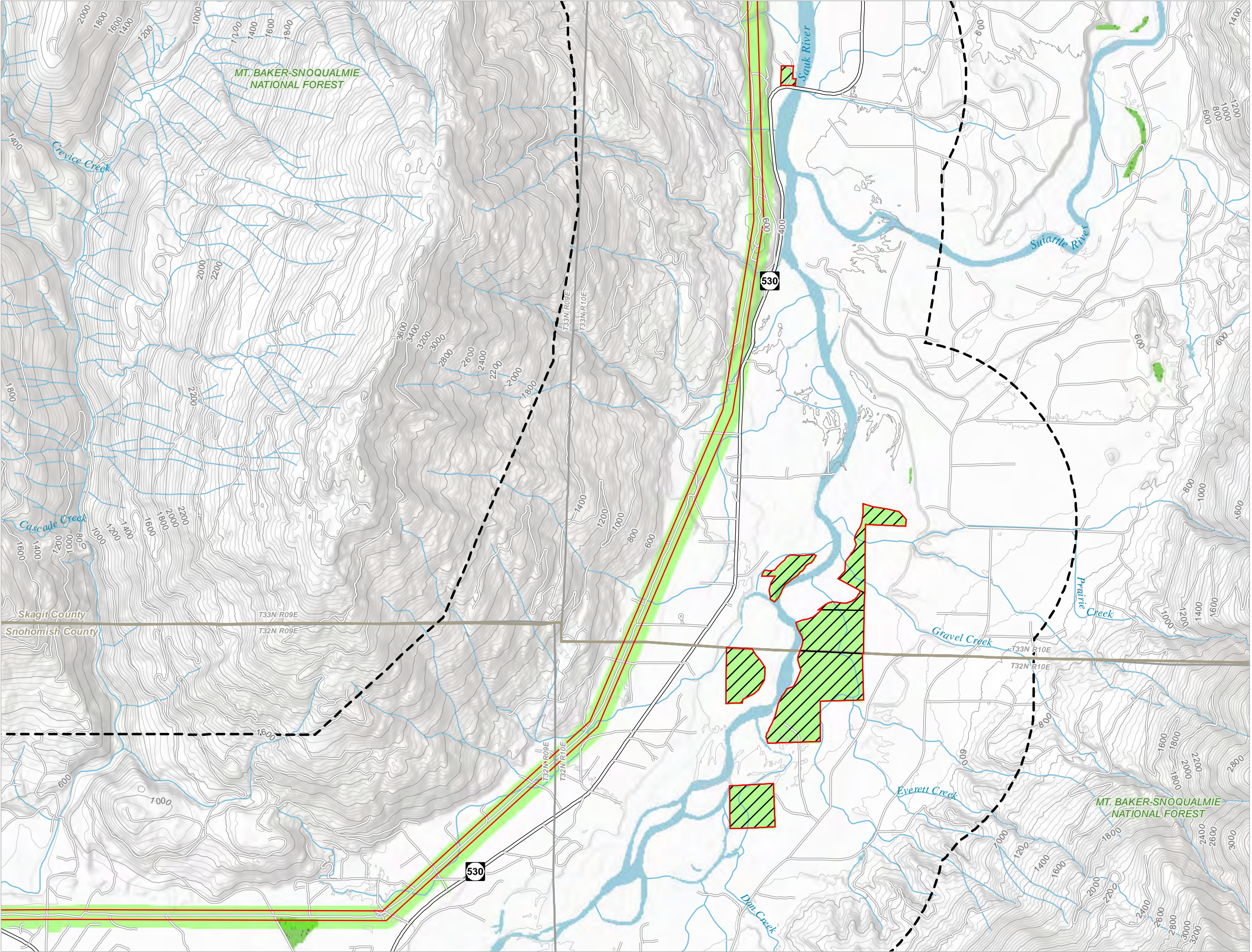
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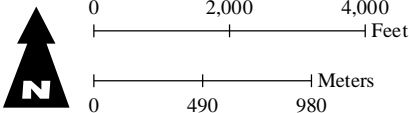
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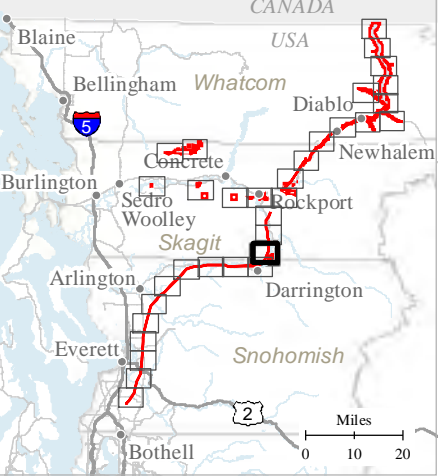
APE MAPBOOK

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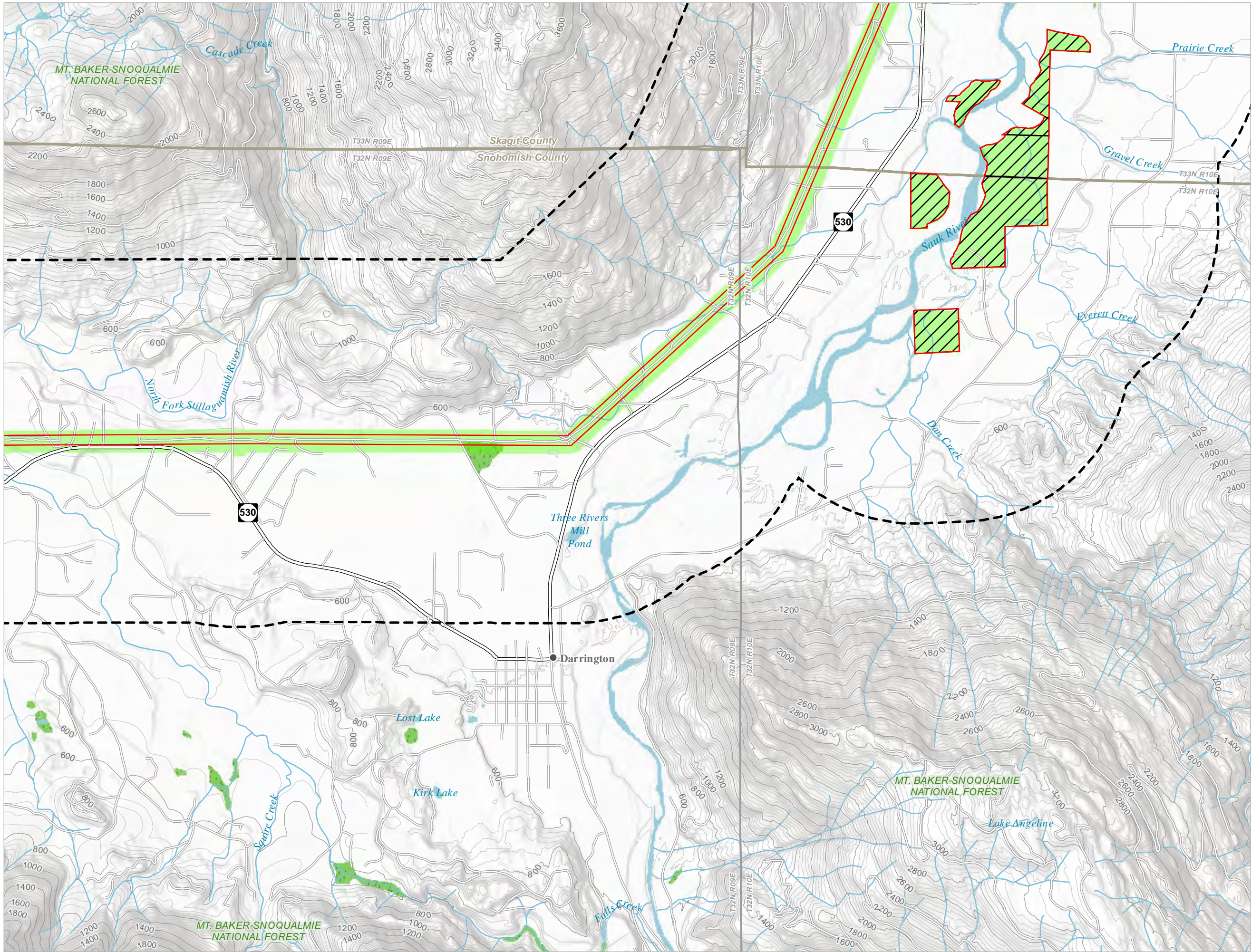
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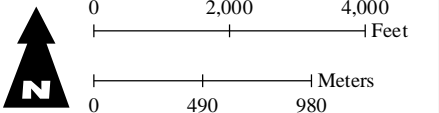
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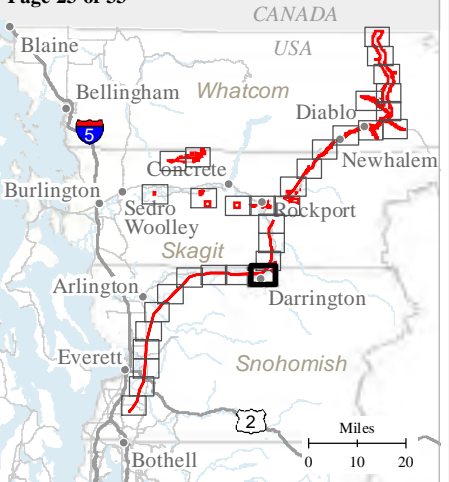
APE MAPBOOK

Legend

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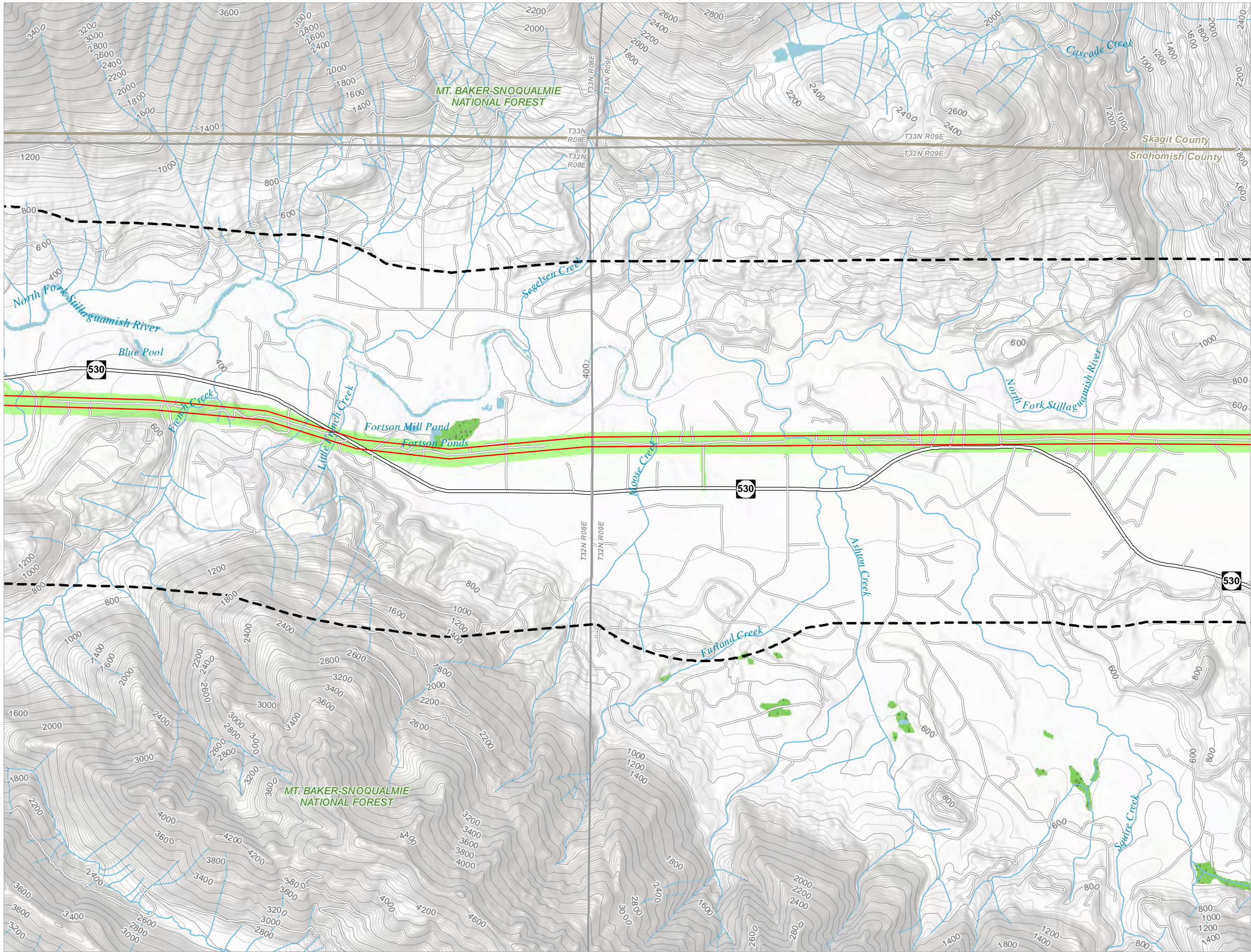
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

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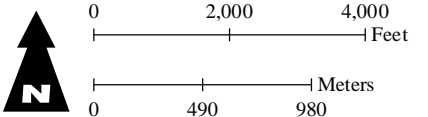
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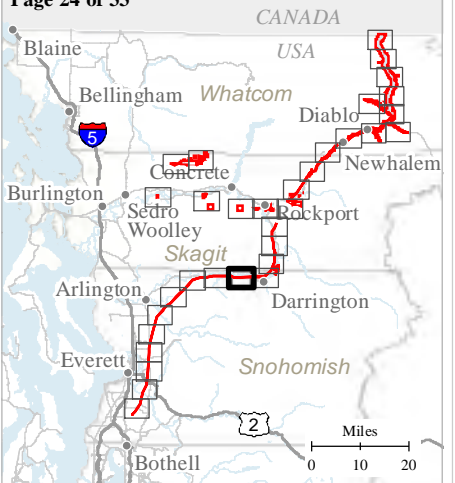
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Legend

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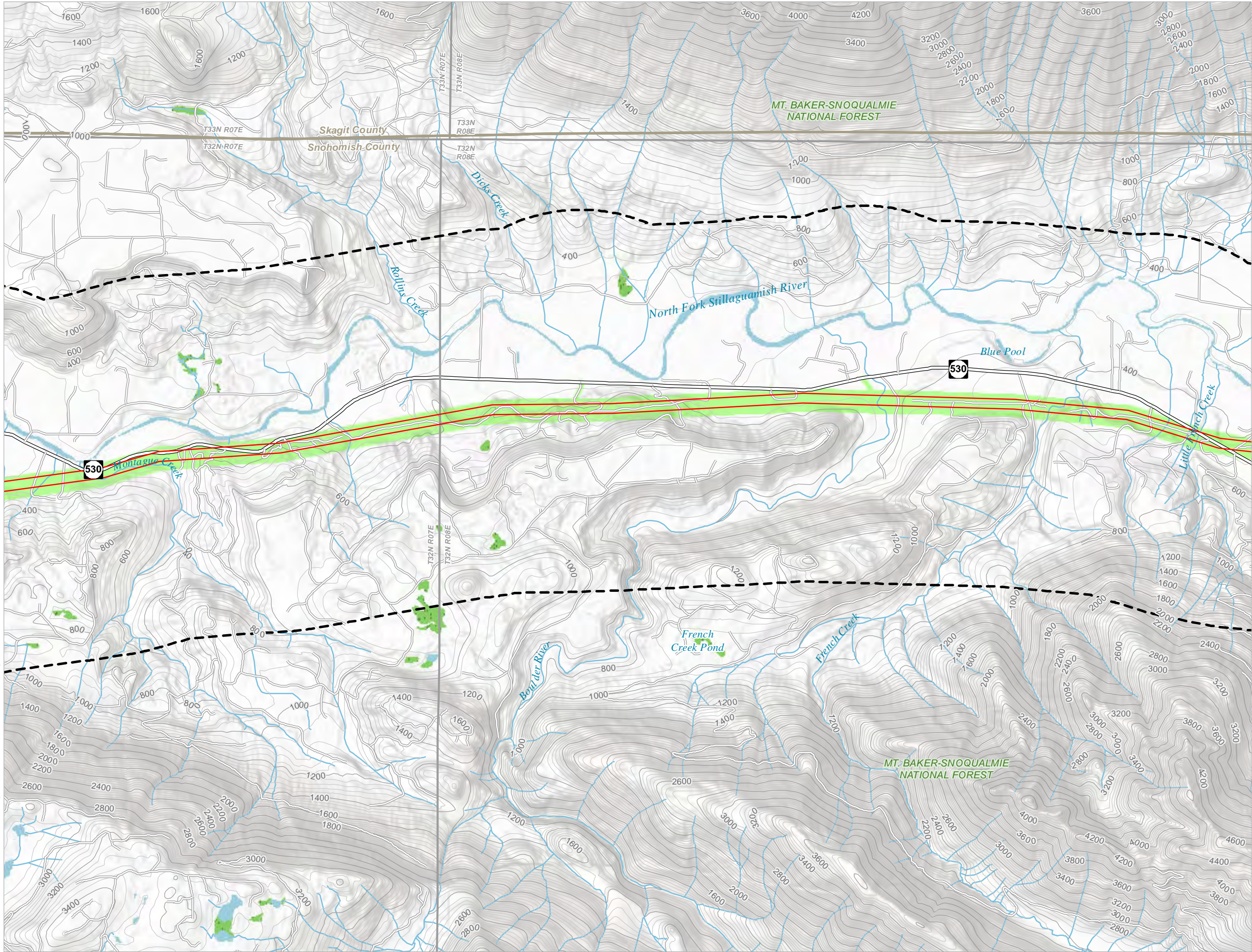
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

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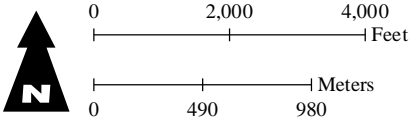
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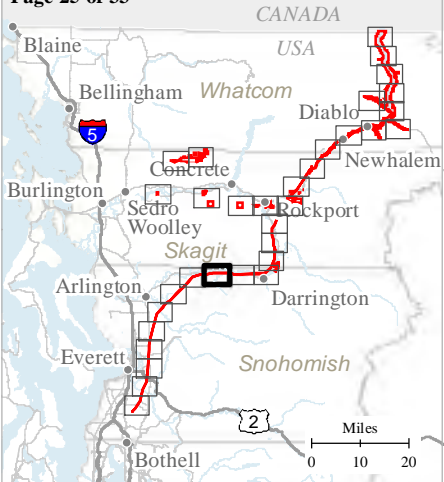
APE MAPBOOK

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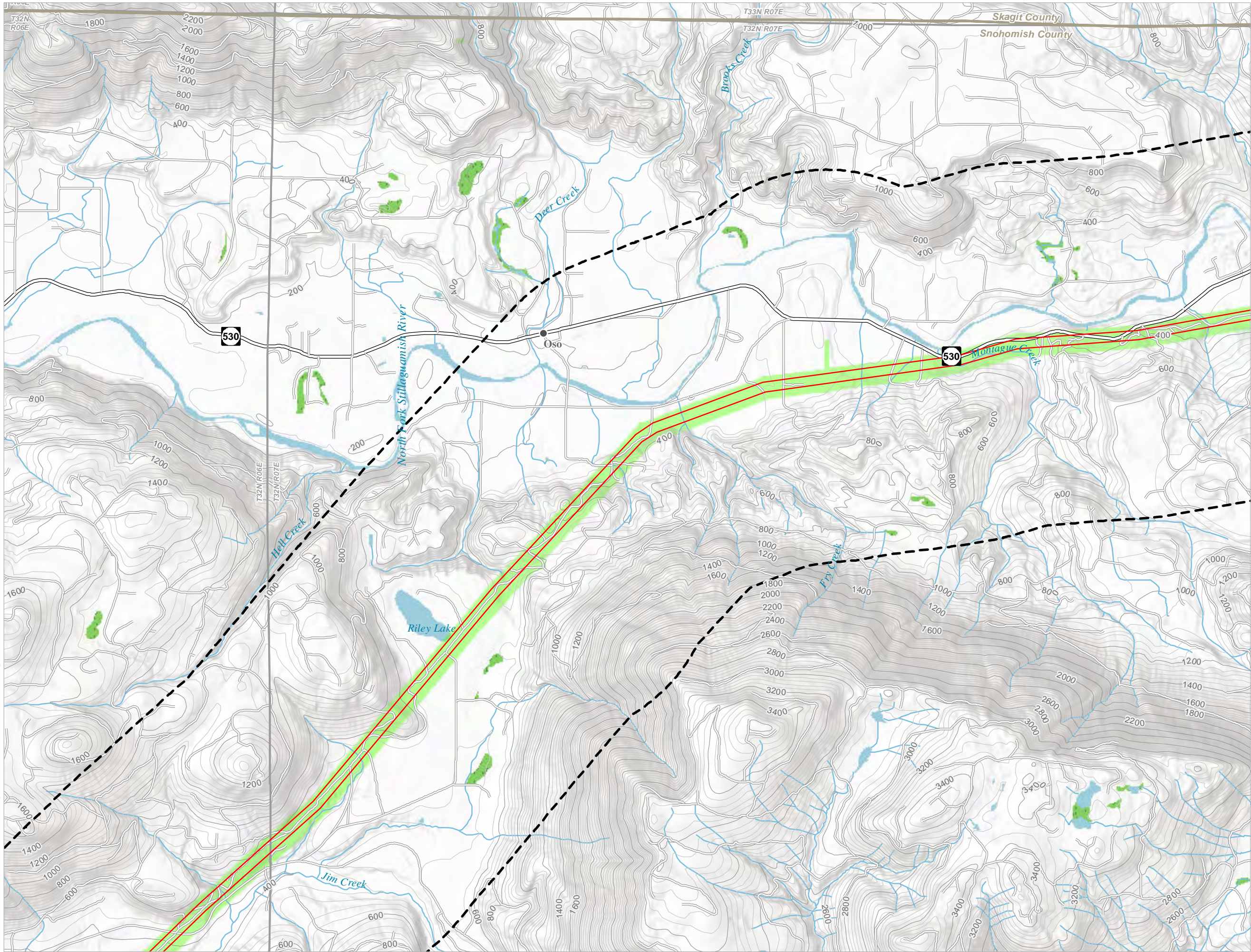
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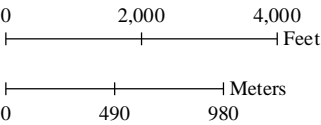
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Legend

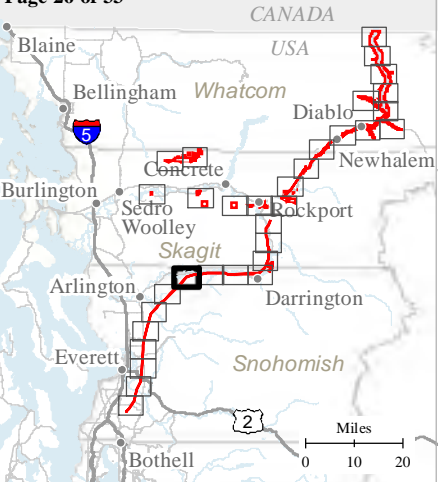
 FERC Project Boundary

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 1-mile Buffer for Potential
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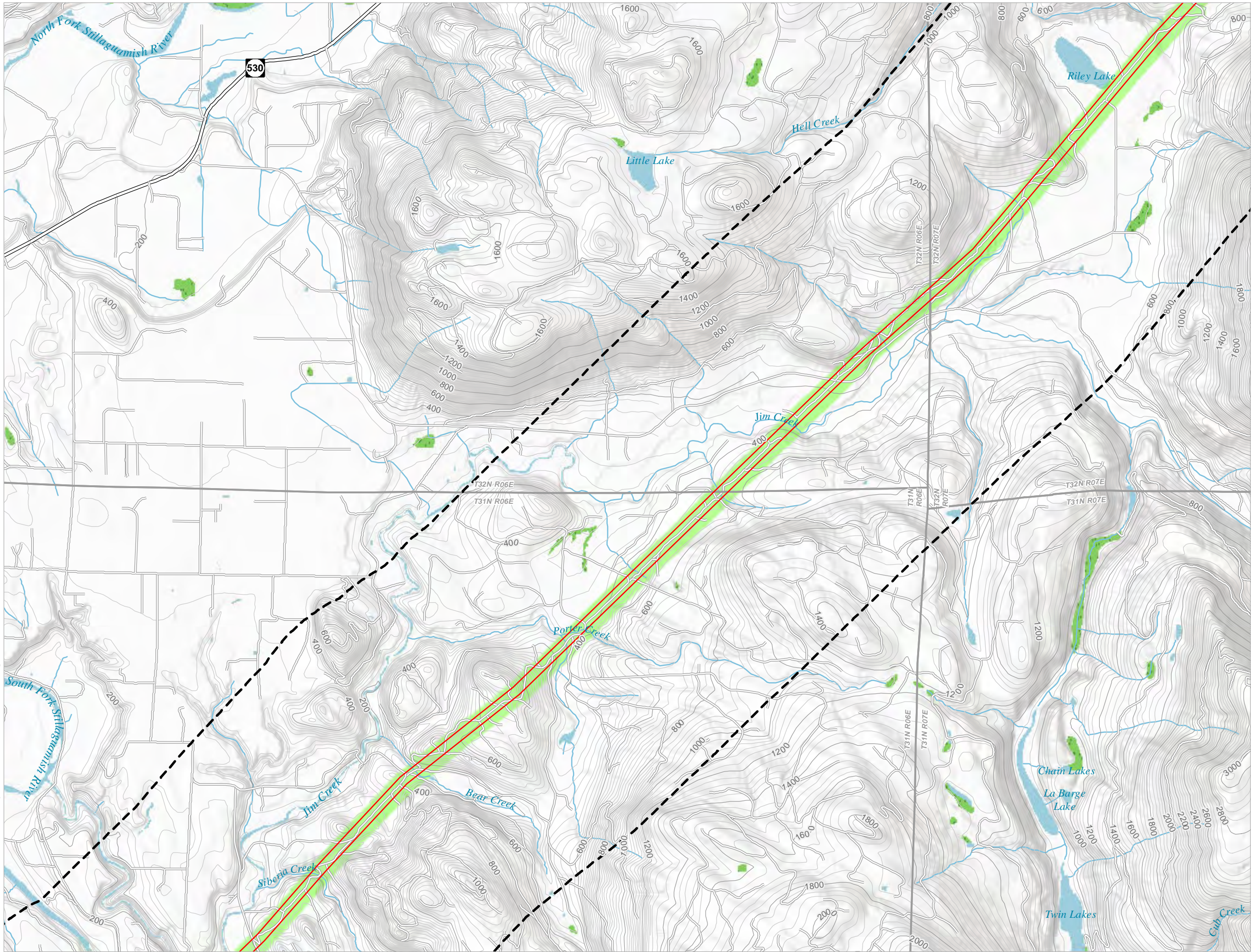


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

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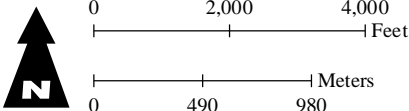
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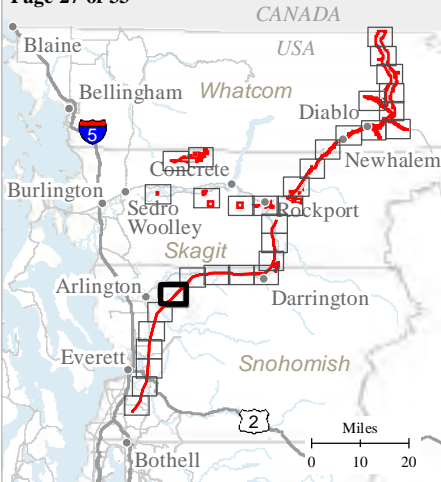
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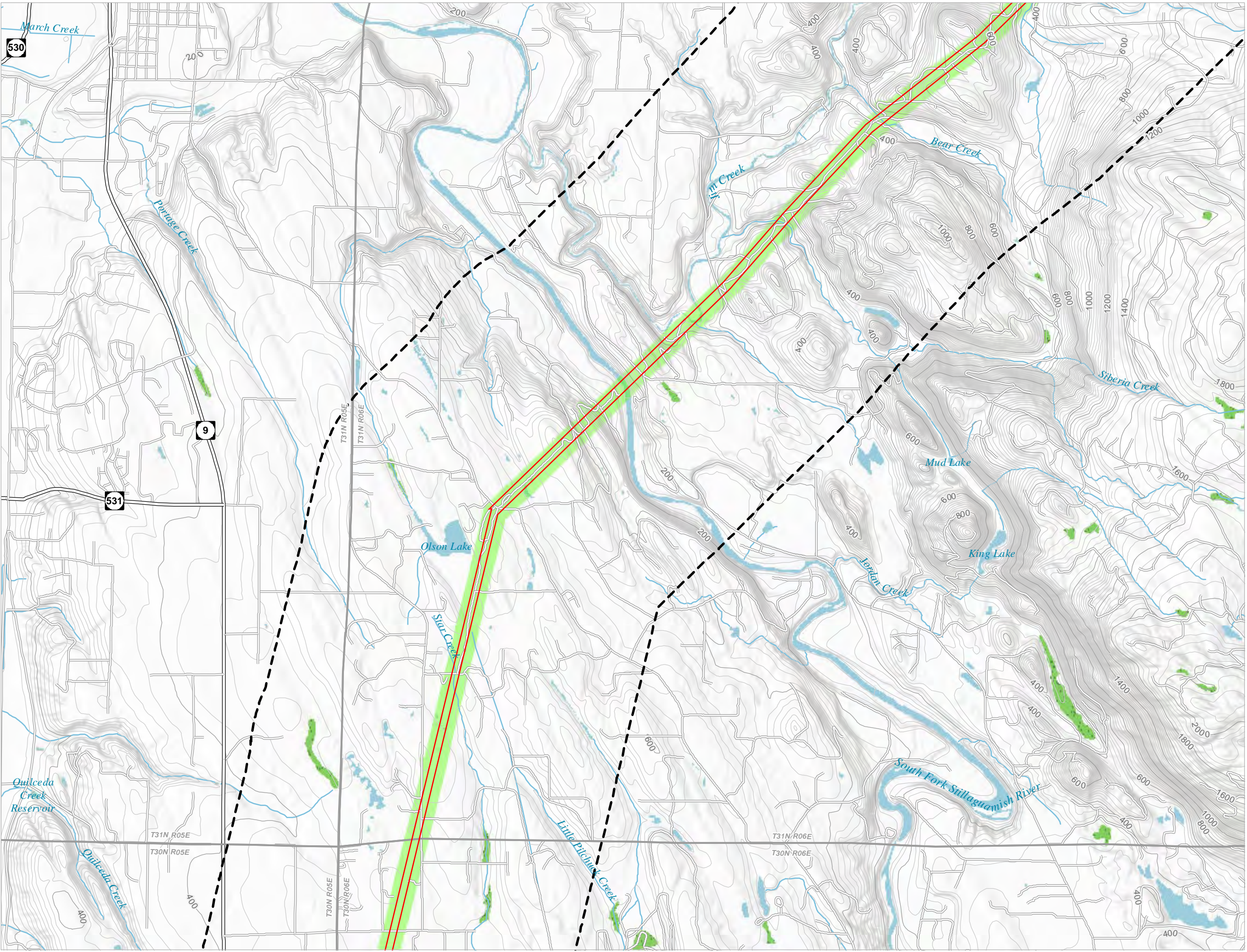
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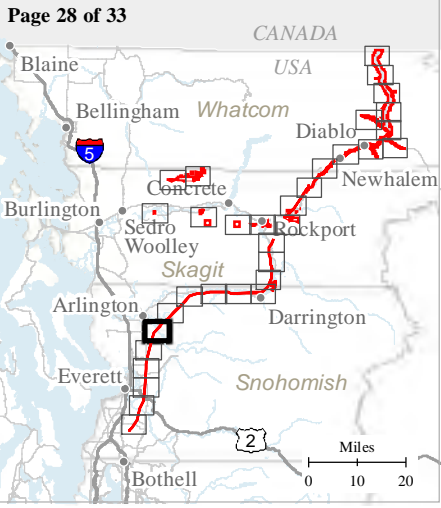
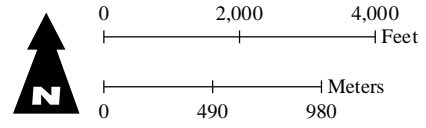
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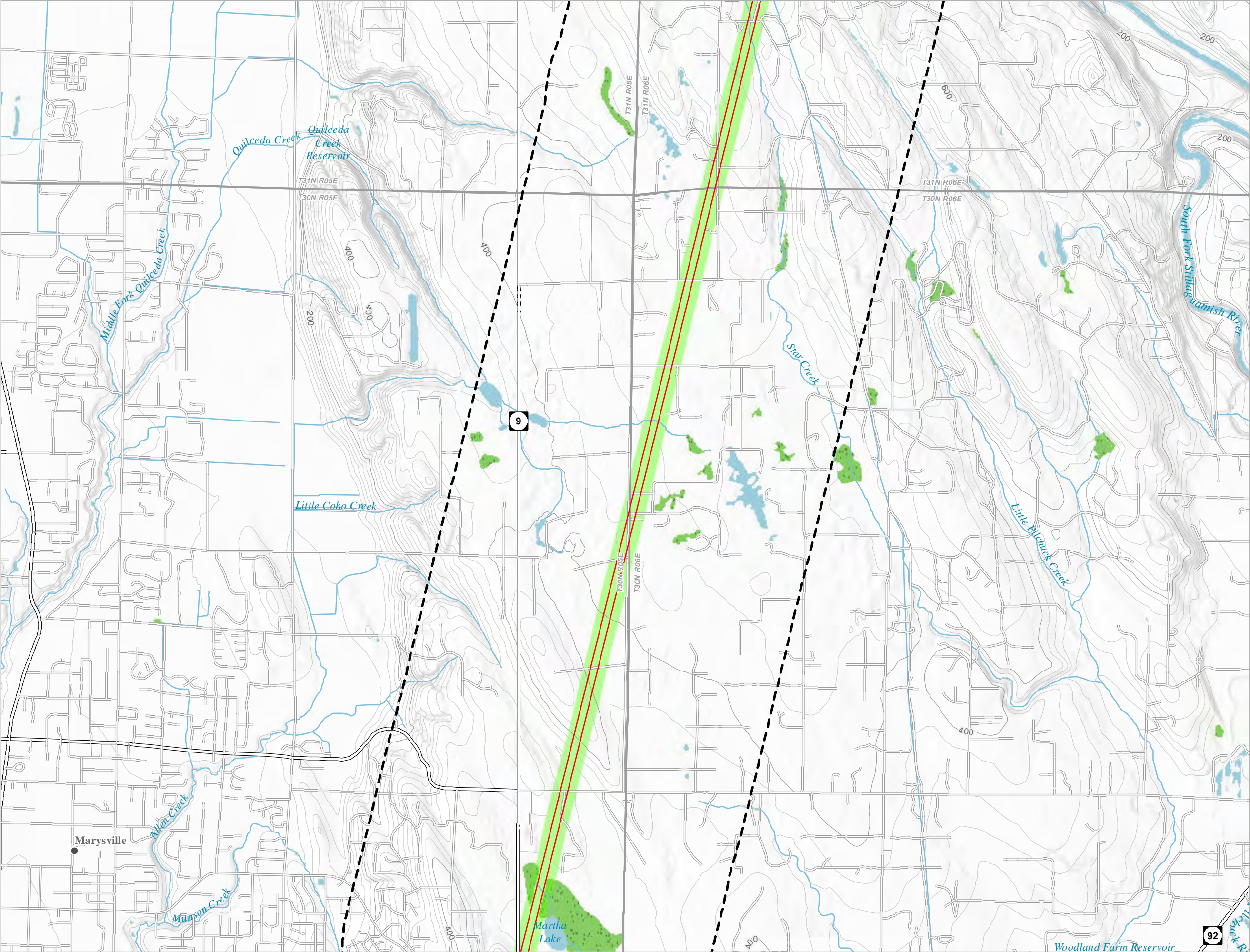
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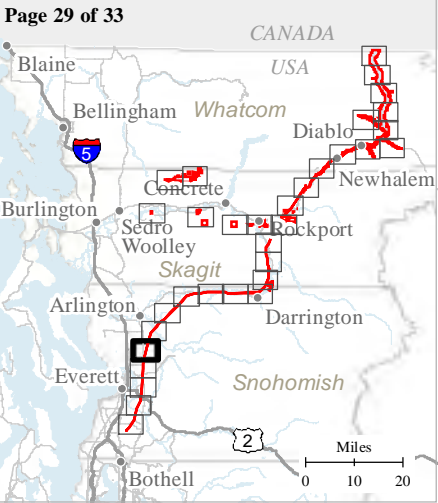
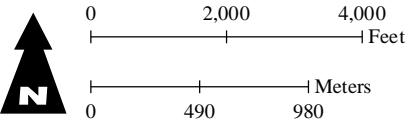
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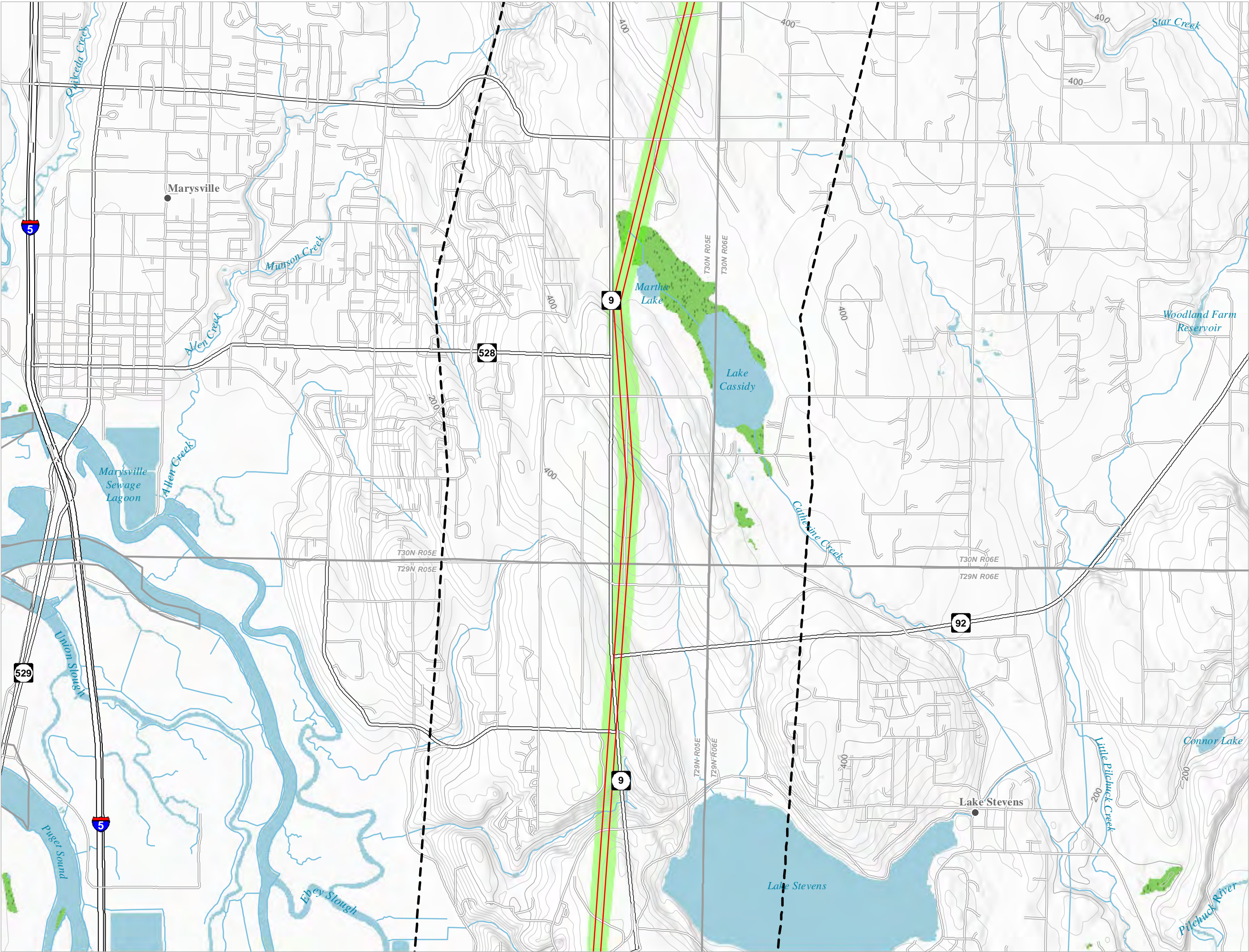
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

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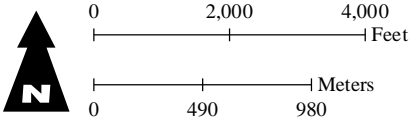
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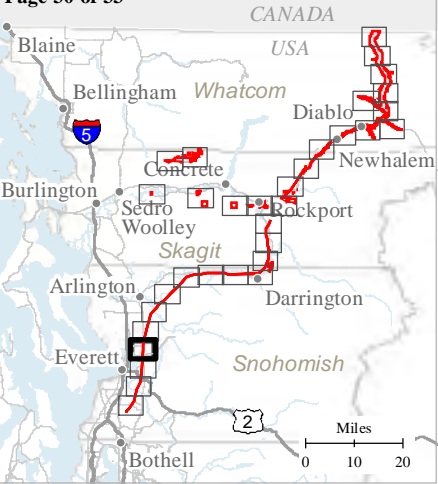
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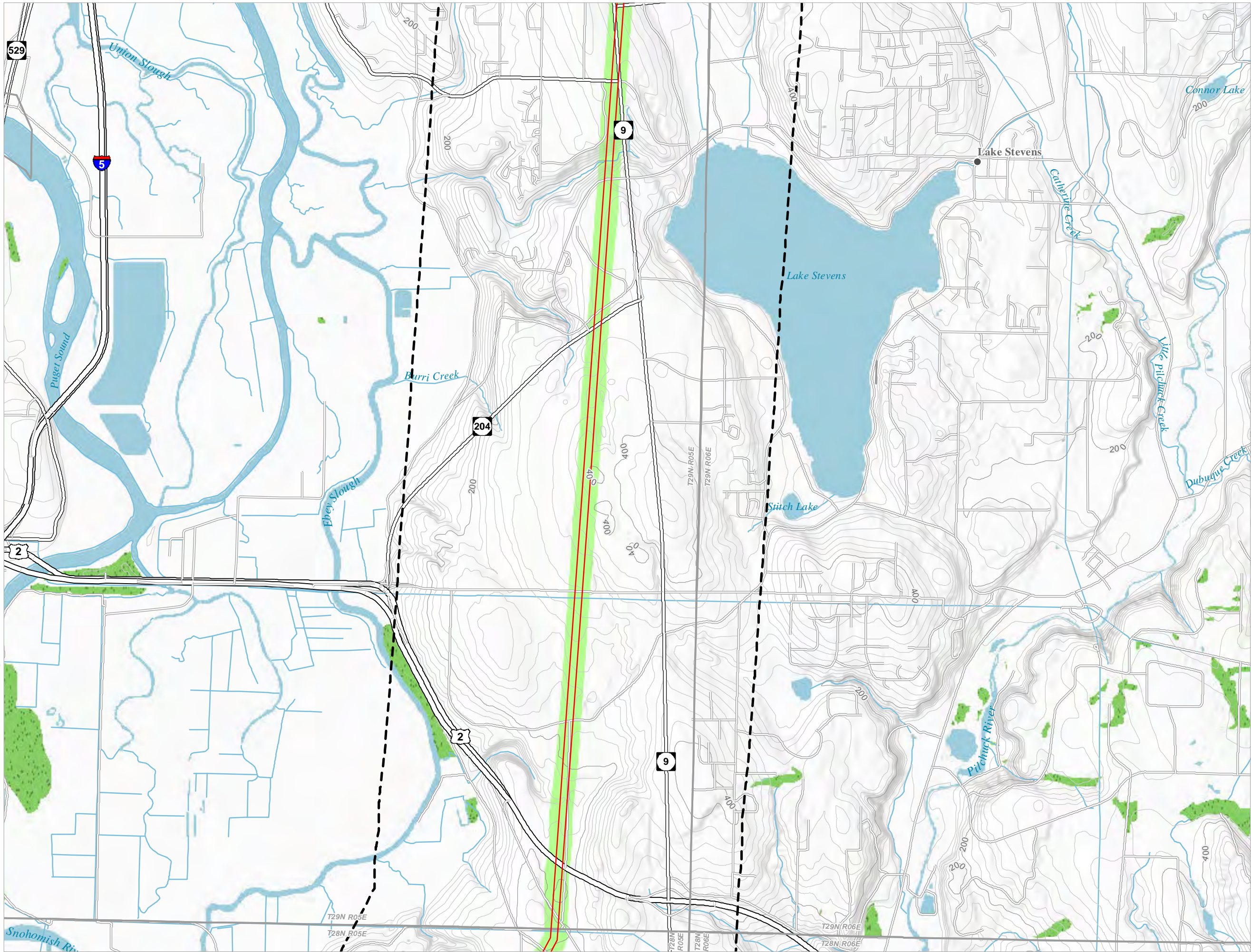
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

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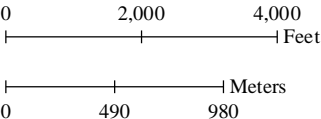
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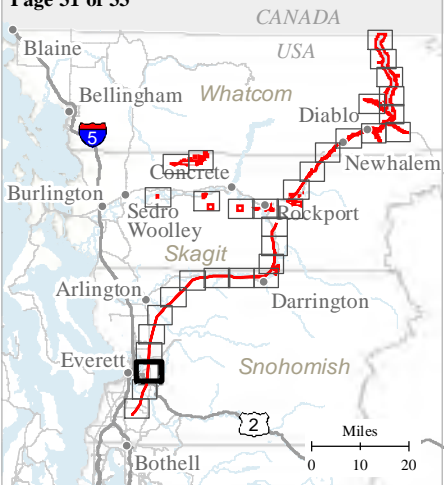
APE MAPBOOK

Legend

-  FERC Project Boundary
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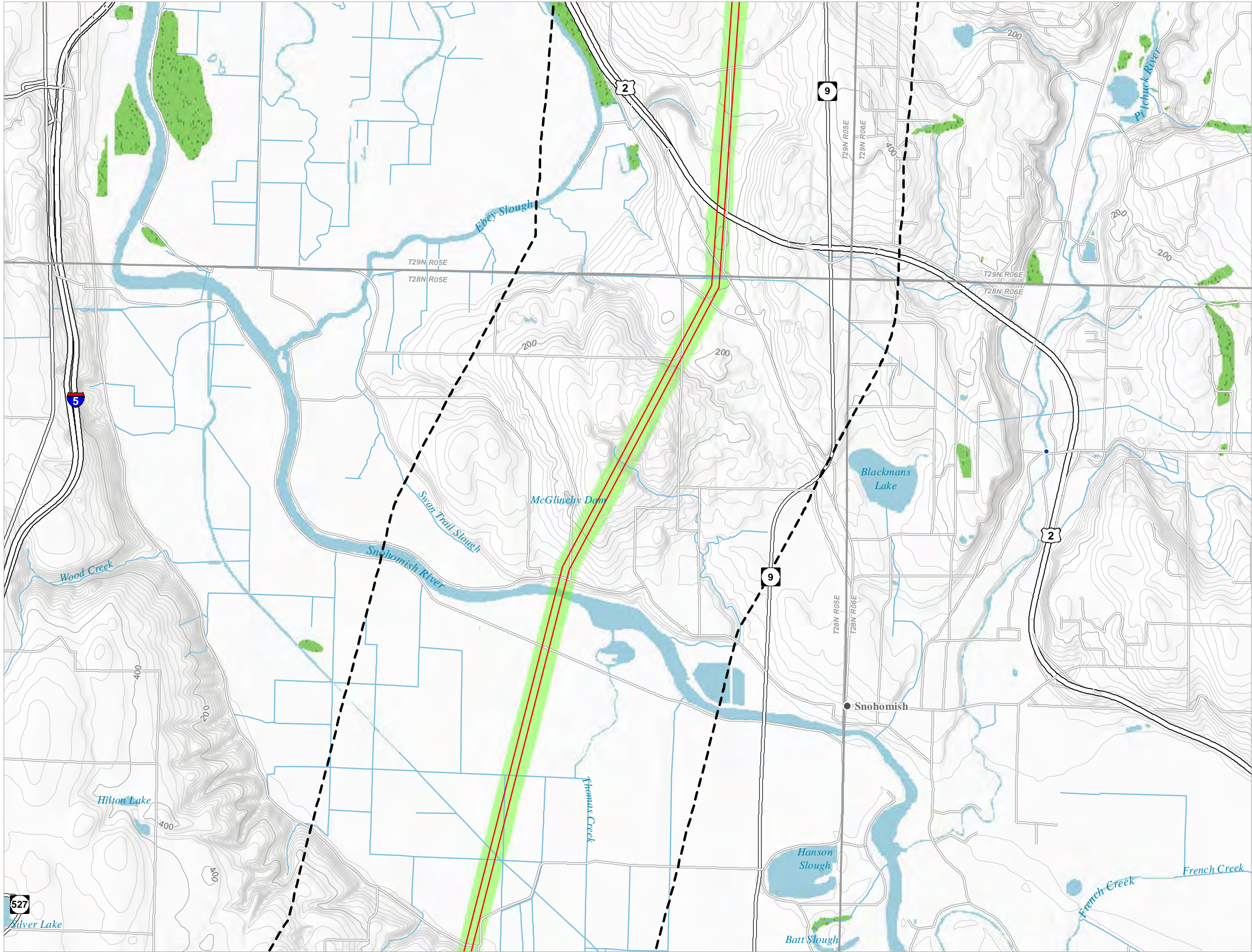


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

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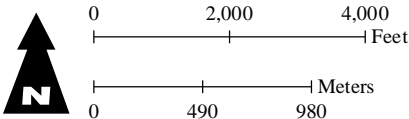
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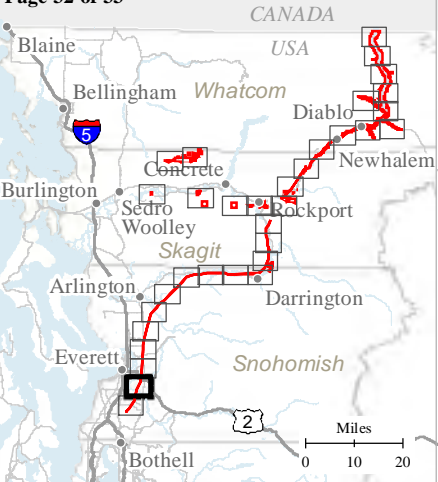
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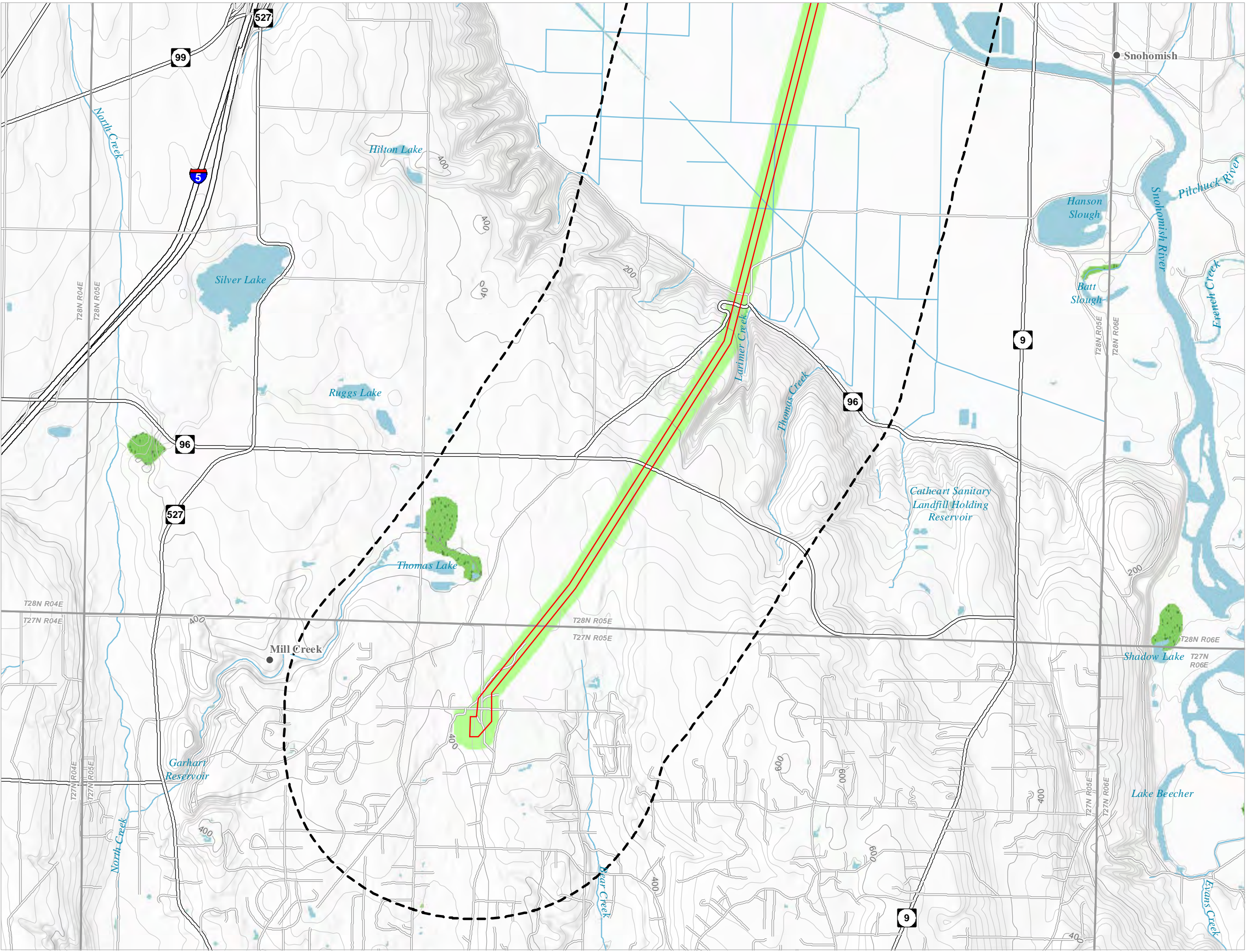
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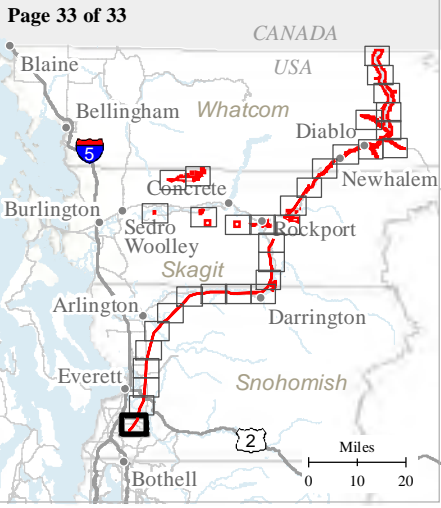
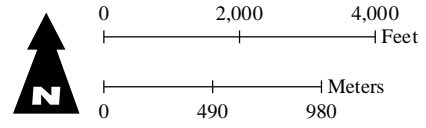
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