

**CR-04 INVENTORY OF HISTORIC PROPERTIES WITH
TRADITIONAL CULTURAL SIGNIFICANCE STUDY
INTERIM REPORT**

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

Seattle City Light

**Prepared by:
HDR Engineering, Inc.**

**March 2022
Initial Study Report**

TABLE OF CONTENTS

Section No.	Description	Page No.
1.0	Introduction.....	1-1
2.0	Study Goals and Objectives	2-1
3.0	Study Area	3-1
4.0	Methods.....	4-1
4.1	General Approach and Protocols	4-1
4.2	Specific Study Implementation Activities	4-2
5.0	Preliminary Results	5-1
6.0	Summary.....	6-1
6.1	Next Steps	6-1
7.0	Variances from FERC-Approved Study Plan and Proposed Modifications.....	7-1
8.0	References	8-1

List of Figures

Figure No.	Description	Page No.
Figure 3.0-1.	Location map of the Skagit River Hydroelectric Project APE.	3-2
Figure 3.0-2.	Skagit River Hydroelectric Project APE depicted on aerial imagery (page 1 of 3).....	3-3
Figure 3.0-2.	Skagit River Hydroelectric Project APE depicted on aerial imagery (page 2 of 3).....	3-4
Figure 3.0-2.	Skagit River Hydroelectric Project APE depicted on aerial imagery (page 3 of 3).....	3-5

List of Acronyms and Abbreviations

AAA.....	American Anthropological Association
AAG.....	Association of American Geographers
ACHP.....	Advisory Council on Historic Preservation
APE.....	area of potential effects
CFR.....	Code of Federal Regulations
City Light.....	Seattle City Light
CRWG.....	Cultural Resources Work Group
DAHP.....	Department of Archaeology and Historic Preservation
FERC.....	Federal Energy Regulatory Commission
HPMP.....	Historic Properties Management Plan
ISR.....	Initial Study Report
NHPA.....	National Historic Preservation Act
NPS.....	National Park Service
NRB.....	National Register Bulletin
NRHP.....	National Register of Historic Places
O&M.....	operations and maintenance
PA.....	Programmatic Agreement
Project.....	Skagit River Hydroelectric Project
RSP.....	Revised Study Plan
SHPO.....	State Historic Preservation Officer
THPO.....	Tribal Historic Preservation Officer
USR.....	Updated Study Report

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1.0 INTRODUCTION

The CR-04 Inventory of Historic Properties with Traditional Cultural Significance (Properties with Traditional Cultural Significance Study) is being conducted in support of the relicensing of the Skagit River Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) No. 553, as identified in the Revised Study Plan (RSP) submitted by Seattle City Light (City Light) on April 7, 2021 (City Light 2021). On June 9, 2021, City Light filed a “Notice of Certain Agreements on Study Plans for the Skagit Relicensing” (June 9, 2021 Notice)¹ that detailed additional modifications to the RSP agreed to between City Light and supporting licensing participants (which include the Swinomish Indian Tribal Community, Upper Skagit Indian Tribe, National Marine Fisheries Service, National Park Service [NPS], U.S. Fish and Wildlife Service, Washington State Department of Ecology, and Washington Department of Fish and Wildlife). The June 9, 2021 Notice proposed no changes to the Properties with Traditional Cultural Significance Study as described in the RSP.

In its July 16, 2021 Study Plan Determination, FERC approved the Properties with Traditional Cultural Significance Study with modifications. Specifically, FERC recommended that City Light include the Nlaka’pamux Nation Bands Coalition as a Canadian First Nation that should be consulted during the study. Accordingly, City Light is consulting with the Nlaka’pamux Nation Bands Coalition for the study.

This interim report provides a status update on the 2021 study efforts and is being filed with FERC as part of City Light’s Initial Study Report (ISR). As described further below, implementation of the Properties with Traditional Cultural Significance Study will continue in 2022. Results of the work will be included in a report in the Updated Study Report (USR) in March 2023.

¹ Referred to by FERC in its July 16, 2021 Study Plan Determination as the “updated RSP.”

2.0 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 Canadian First Nations are identified and assessed for potential adverse effects from this Project during the new license term. The objective of this study is to assist FERC in meeting its compliance requirements under Section 106 of the National Historic Preservation Act (NHPA). These efforts will be conducted in consultation with Section 106 consulting parties, as required pursuant to 36 Code of Federal Regulations (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 National Register of Historic Places (NRHP) eligibility determinations will also be sought.

3.0 STUDY AREA

The study area for this Properties with Traditional Cultural Significance Study is the Project's area of potential effects (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 has defined 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.

The APE is shown in Figures 3.0-1 and 3.0-2. On March 12, 2021, City Light initiated Section 106 consultation with the Department of Archaeology and Historic Preservation (DAHP) and provided a description of its proposed APE for the relicensing efforts. City Light continued to work with DAHP and Section 106 consulting parties to refine the APE and submitted a revised APE to the consulting parties for review on April 29, 2021, which was filed with FERC on May 3, 2021. An update to the APE mapbook was provided to the consulting parties and filed with FERC on May 10, 2021. The DAHP concurred with the APE on June 23, 2021. The APE includes areas where anticipated potential physical effects and potential auditory and visual effects may occur. Potential auditory and visual effects may occur where potential physical effects occur, in addition to outside areas that are physically affected.

City Light will update the APE, if necessary, where demonstrated and reasonably anticipated Project effects have the potential to affect historic properties outside the current APE. If such areas are identified, the APE will be expanded to include these areas. Any updates to the APE will be described in the USR,² and provided to Section 106 consulting parties in advance for 30-day review and comment period(s).

² 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.

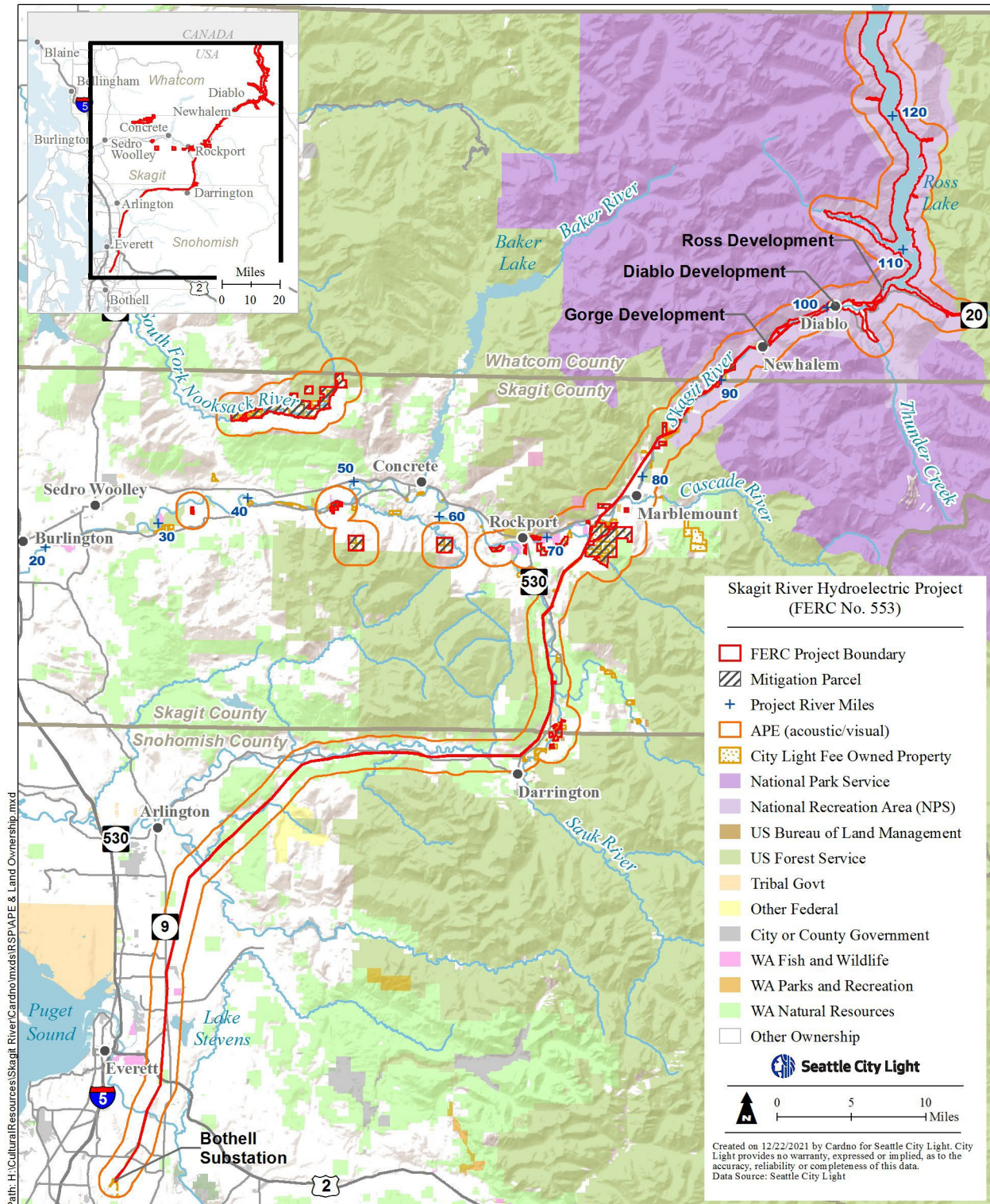


Figure 3.0-1. Location map of the Skagit River Hydroelectric Project APE.

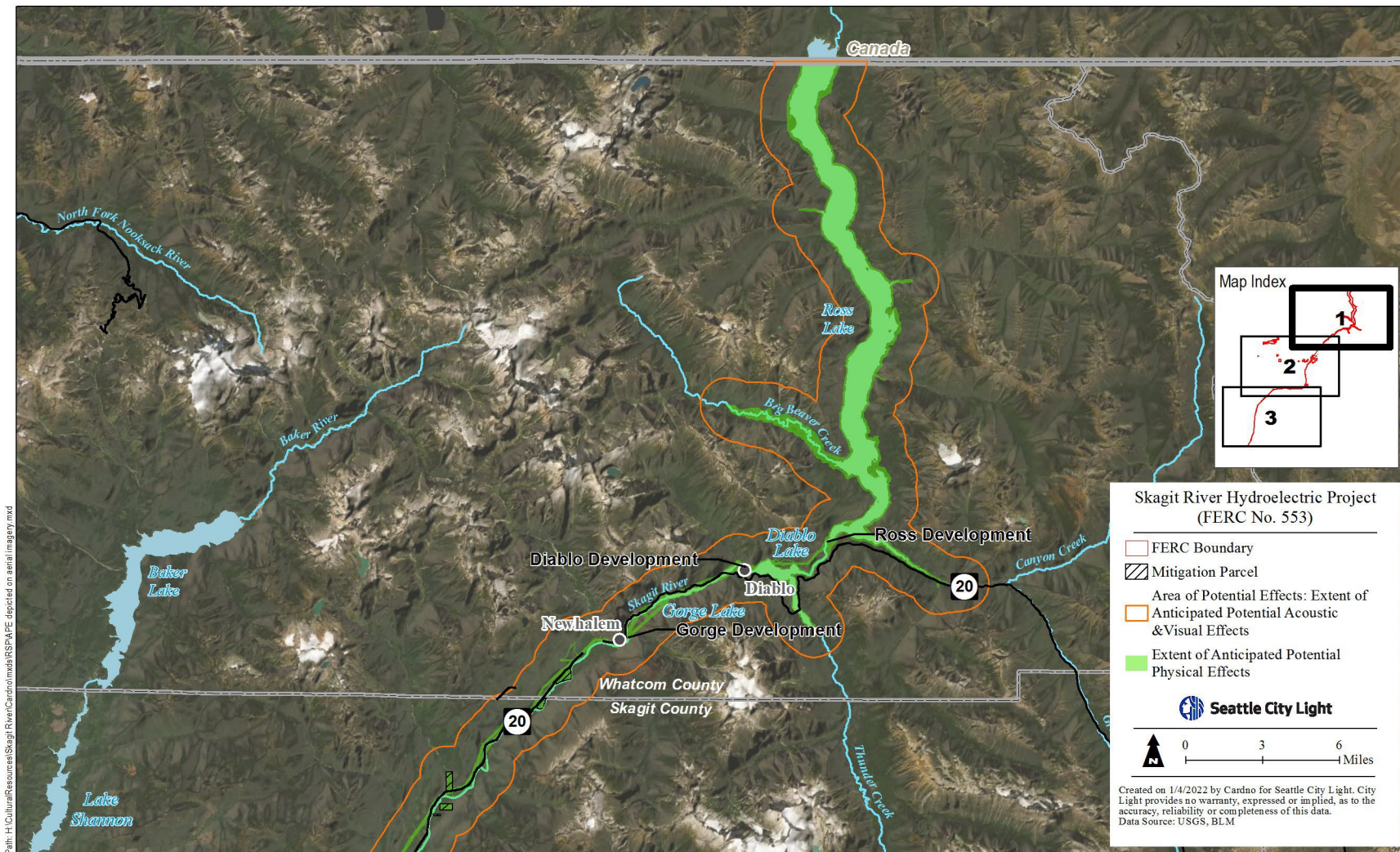


Figure 3.0-2. Skagit River Hydroelectric Project APE depicted on aerial imagery (page 1 of 3).

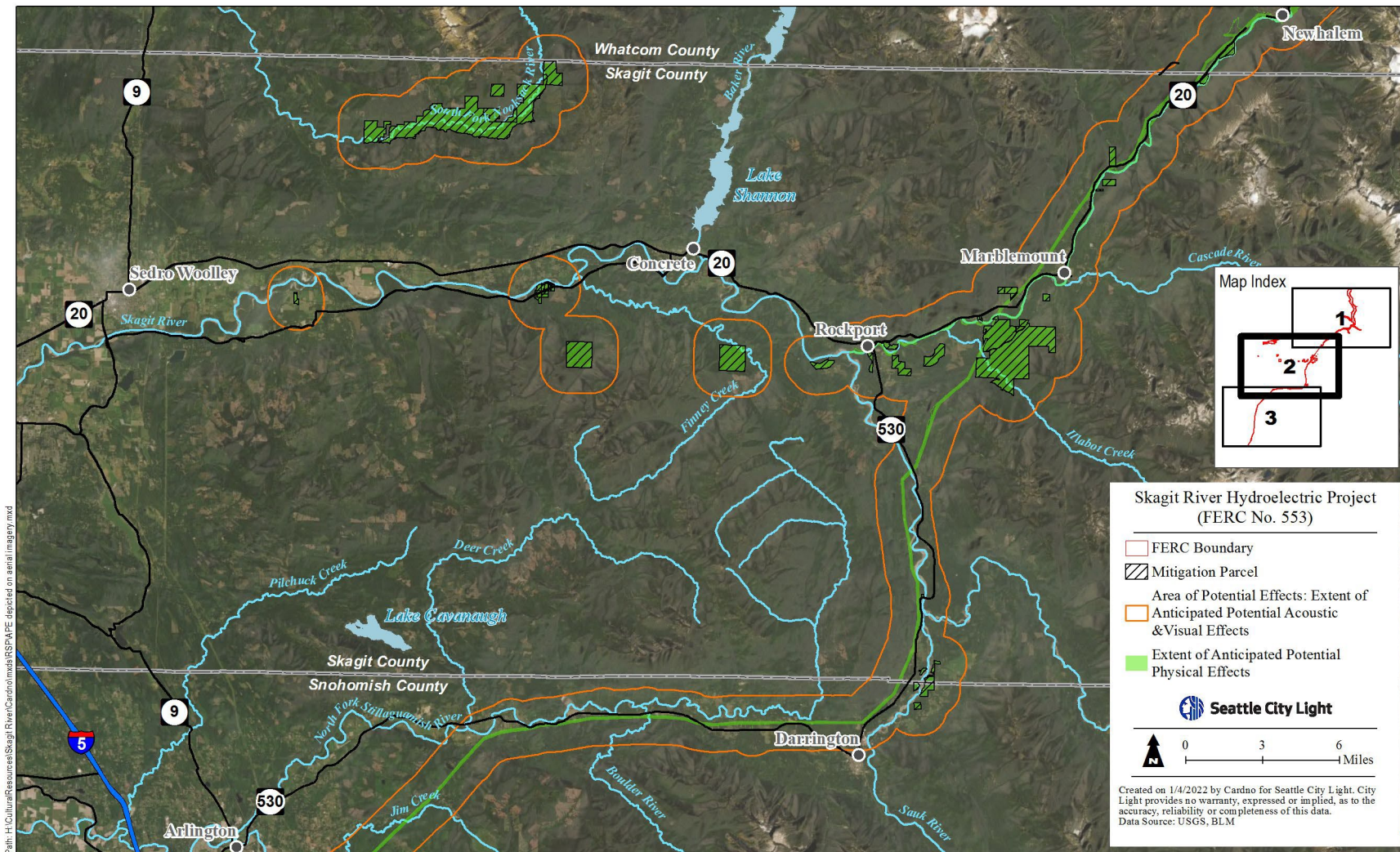


Figure 3.0-2. Skagit River Hydroelectric Project APE depicted on aerial imagery (page 2 of 3).

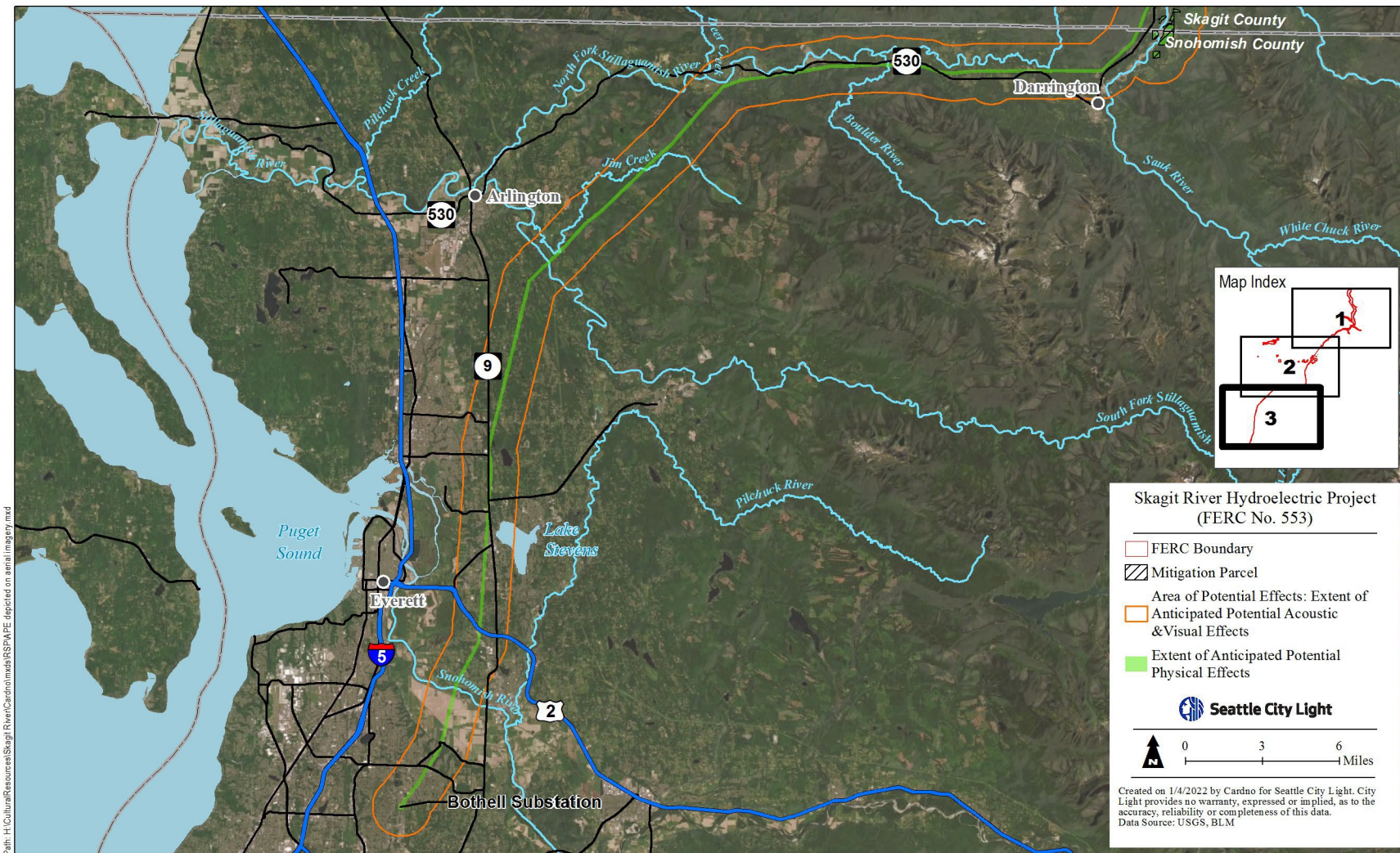


Figure 3.0-2. Skagit River Hydroelectric Project APE depicted on aerial imagery (page 3 of 3).

4.0 METHODS

The description of methodology for the implementation of the Properties with Traditional Cultural Significance Study is provided below.

4.1 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 conform to the ethical and professional standards and responsibilities outlined in Appendix II of National Register Bulletin (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 Canadian First Nations. It is necessary for limited individuals at City Light, FERC, and DAHP to have access to some confidential information through the reports completed for this study in order to identify historic properties within the APE and to evaluate potential Project effects on them. However, City Light and its 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 Canadian 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. Other federal land managing agencies, such as NPS and the U.S. Forest Service, will also access some confidential information to complete their review of resource eligibility and Project effects.
- (3) Participating Indian Tribes and/or Canadian First Nations will be provided the opportunity to review their own information as drafted for inclusion in the study reports completed for this study (as described further below) prior to distribution to City Light and the Section 106 consulting parties. The purpose of this review is to consider the accuracy of how the information provided has been presented, and to consider how the information is disseminated in order to protect confidentiality. See the section below on reporting for more information.
- (4) Each participating Indian Tribe and/or Canadian First Nation will be engaged separately. Cross-sharing of information among each of the parties will be at the discretion of each Indian Tribe and/or Canadian First Nation and will not be done by City Light without written consent. No participating Indian Tribe and/or Canadian First Nation will edit information that they did not provide.

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 operations and maintenance (O&M) during the new 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 Canadian 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 Canadian 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 Canadian First Nations may already have completed similar studies they wish City Light to incorporate into this study and/or will choose 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 Canadian First Nations in formats deemed appropriate by each community. The specific study implementation activities identified below take into account this approach.

4.2 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) (hereinafter referred to as “ethnographer”). The selected ethnographers will implement this Properties with Traditional Cultural Significance Study. This step includes soliciting input from Indian Tribes and Canadian First Nations on who they recommend for this role. The final selection and hiring is determined by City Light.

Step 2: Indian Tribe/Canadian First Nations Outreach. The ethnographers will conduct outreach with individual Indian Tribes and Canadian First Nations. This outreach will identify and establish: (1) which Indian Tribes and Canadian 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 Canadian 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 Indian Tribes and Canadian First Nations; (5) 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) 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 Canadian First Nations that summarizes the outcome of (1)-(6) above and ultimately meets the requirements for this study. 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 Canadian First Nation. 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 Canadian 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 Canadian First Nation wants to participate:

- Background research from available archival materials and published ethnohistoric, ethnographic, environmental references, and data from the CR-01 Cultural Resources Data Synthesis (City Light 2022a, 2022b; Curti et al. 2020);
- Review and collection of any previous study efforts conducted by participating Indian Tribes and Canadian First Nations that was not previously accessed during the implementation of the CR-01 Cultural Resources Data Synthesis;
- Ethnographic interviews;
- Site visits with representatives from participating Indian Tribes and Canadian First Nations in areas of the APE where Project effects or reasonably foreseeable Project effects may occur; and
- Pedestrian field surveys in areas of the APE where Project effects or reasonably foreseeable Project effects may occur.

Step 4: Historic Properties with Traditional Cultural Significance Documentation and NRHP Evaluation. The participating Indian Tribes and Canadian First Nations will work with their chosen ethnographers to accomplish the following:

- Identify potential properties with traditional cultural or religious significance within areas of the APE where Project effects or reasonably foreseeable Project effects may occur;
- Consider and review previous NRHP eligibility evaluations within the APE conducted by others to determine if additional evaluation efforts are needed;
- Review gathered data and information, conduct additional site visits and pedestrian survey, if necessary, and identify and document, as appropriate, historic properties with traditional cultural significance in areas of the APE where Project effects or reasonably foreseeable Project effects may occur;

- Apply 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 where Project effects or reasonably foreseeable Project effects may occur;³
- Evaluate the integrity of each significant property following NRB 15 and 38; and
- Document 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 for 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 below), and an approach for additional inventory/evaluation will be outlined in the Historic Properties Management Plan (HPMP)⁴ if feasible, appropriate, and/or necessary. This study does not include formally listing properties in the NRHP.

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

³ As stated above, the objective of this study is to assist FERC with Section 106 compliance by identifying historic properties (i.e., cultural resources listed or eligible for listing in the NRHP). Because resources do not need to be listed in the NRHP to be considered a historic property, it is the intent of this study to focus evaluation efforts on individual resources' eligibility for inclusion in the NRHP. It is not the intent of this study to formally nominate properties for listing in the NRHP.

⁴ FERC typically completes Section 106 by entering into a Programmatic Agreement (PA) with the license applicant, the ACHP, and the SHPO. Because it is not always possible for FERC to determine all project effects of various activities that may occur over the course of a license, the PA typically provides, and FERC typically requires as a license condition, that the licensee develop and implement a HPMP to protect historic properties.

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 to such properties, and any potential treatment identified by an individual Indian Tribe or Canadian First Nation. The review and dissemination of this information, as outlined during Step 2, will be followed and reviewed during this step. It is anticipated 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 prepared by the ethnographers summarizing the efforts and conclusions of this study will be provided to participating Indian Tribes and Canadian First Nations, City Light, federal land managing agencies, and other agencies for review and comment. City Light, who has been designated by FERC as its non-federal representative for carrying out informal consultation pursuant to Section 106 of the NHPA, will subsequently submit the reports to SHPO (DAHP) and/or THPO, as appropriate, for review and concurrence on any assessments of NRHP eligibility and Project effects. City Light will then file the summary report with FERC in its privileged (i.e., confidential) files.

A non-confidential summary of the report findings will also be included in the license application, which will be made available to the public and will be filed with FERC by City Light.

5.0 PRELIMINARY RESULTS

To accomplish Step 1, Selection of Ethnographers, early solicitation was sought from the Indian Tribes and Canadian First Nations regarding ethnographers they recommended for the study during the November 16, 2020 Cultural Resources Work Group (CRWG) meeting and in follow-up emails. City Light and its consultant, HDR Engineering, Inc., initiated outreach to a pool of potential ethnographers in December 2020. Virtual interviews with interested and qualified ethnographers were conducted in January and February 2021.

City Light provided the names and qualifications of ethnographers to the CRWG in March-April 2021. Input was received from the CRWG and City Light made their final selection of the lead ethnographers in July/August 2021, and notified the CRWG of the tentative selection of the lead ethnographers in September 2021. All three lead ethnographers meet the ethnography qualifications outlined in NRB 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998):

- Senior Advisor: Doug Deur, PhD (Portland State University);
- Co-lead: Joyce LeCompte-Mastenbrook, PhD (Camassia Resource Stewardship); and
- Co-lead: Mario Battaglia, MA (Algonquin Consultants, Inc.).

As of December 1, 2021, the seven Indian Tribes and Canadian First Nations listed below have elected to participate in the study. Several of these Indian Tribes and Canadian First Nations are working with additional ethnographers to implement the study (as listed below). As of the filing of this ISR, all ethnographers are under contract with either HDR or the participating community. Further work on this study will include the following groups:

- Confederated Tribes of the Colville Reservation (completing study within the Confederated Tribes of the Colville Reservation History and Archaeology Department);
- Nlaka'pamux Nation Bands Coalition (working with ethnographer Richard Inglis, MA);
- Nlaka'pamux Nation Tribal Council (working with ethnographer Mario Battaglia, MA);
- Sauk-Suiattle Indian Tribe (working with ethnographer Sara Breslow, PhD);
- Stillaguamish Tribe of Indians (working with Cultural Geographics Consultants, LLC);
- Stó:lō Nation (completing study within Stó:lō Nation); and
- Swinomish Indian Tribal Community (working with Cultural Geographics Consultants, LLC).

The Nlaka'pamux Nation Tribal Council previously prepared study methods for their portion of the study, which were incorporated in the RSP filed with FERC on April 7, 2021. The study methods build upon their survey completed for the current license under an Administrative Memorandum of Agreement between City Light and the Nlaka'pamux Nation Tribal Council (City Light 2010). As part of the Properties with Traditional Cultural Significance Study, and building upon their previous survey, the Nlaka'pamux Nation Tribal Council conducted two weeks of field survey between October 7-13 and October 21-26, 2021. Additional survey sessions will be

completed in the second study season. All study results will be reported in forthcoming study reports.

6.0 SUMMARY

The Properties of Traditional Cultural Significance Study was planned as a two-year study. Two of the participating Indian Tribes and Canadian First Nations are completing the study with their own in-house expertise and five of the participating Indian Tribes and Canadian First Nations are working with consulting ethnographers. One community, the Nlaka'pamux Nation Tribal Council, has initiated their field study and will continue in the second study season.

6.1 Next Steps

Ongoing work will continue in the second study season to complete the development of the research design, gather data and information, document and evaluate historic properties with traditional cultural significance, evaluate Project effects, and complete reporting. A status update of the second study season will be reported on in the USR. The final study report(s) will be filed with FERC, in agreement with predetermined confidentiality protocols, once Section 106 of the NHPA consultation efforts have been completed. A non-confidential summary of the report findings to date will also be included in the license application, which will be made available to the public and will be filed with FERC.

A study schedule that has been updated from the RSP is provided below:

- Step 1 – Selection of ethnographers.
 - January – December 2021.⁵
- Step 2 – Tribal/First Nations outreach.
 - December 2021 – March 2022.
- Step 3 – Ethnohistorical and ethnographic data and information gathering.
 - January 2022 – June 2022.
- Step 4 – Historic properties with traditional cultural significance documentation and NRHP evaluation.
 - March – October 2022.
- Step 5 – Consider Project-related adverse effects on historic properties with traditional cultural significance.
 - March – December 2022.
- Step 6 – Reporting.
 - 2023.

⁵ After a nation-wide search and coordination with Indian Tribes and Canadian First Nations, eight ethnographers were contracted to implement the study with their work commencing in 2022.

7.0 VARIANCES FROM FERC-APPROVED STUDY PLAN AND PROPOSED MODIFICATIONS

There are no variances to the FERC-approved study plan for the Properties with Traditional Cultural Significance Study; however, there are two minor modifications. First, the study area, which is the APE, was expanded based on comments received from DAHP and the consulting parties during consultation in 2021. The expanded APE was filed with FERC on May 10, 2021. The DAHP concurred with the finalized APE on June 23, 2021.

The second modification consists of an updated schedule for study implementation as provided in Section 6.1. The updated schedule reflects the extensive effort spent on ethnographer selection and the subsequently projected schedule for study completion.

8.0 REFERENCES

- Advisory Council on Historic Preservation (ACHP). 2019. Memorandum: Recent court decision regarding the meaning of “direct” in Sections 106 and 110(f) of the National Historic Preservation Act. [Online] URL: http://shpo.nv.gov/uploads/documents/OGC_memo_to_ACHP_staff_re_meaning_of_direct_6-7-19.pdf. Accessed November 19, 2020.
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