

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

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

Seattle City Light

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**March 2023
Updated Study Report**

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List of Acronyms and Abbreviations

| | |
|-----------------|--|
| AAA..... | American Anthropological Association |
| 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 |
| HDR..... | HDR Engineering, Inc. |
| HPMP..... | Historic Properties Management Plan |
| M.A. | Master of Arts |
| NHPA..... | National Historic Preservation Act |
| NPS | National Park Service |
| NRB | National Register Bulletin |
| NRHP | National Register of Historic Places |
| PA | Programmatic Agreement |
| PhD | Doctor of Philosophy |
| Project | Skagit River Hydroelectric Project |
| RSP | Revised Study Plan |
| SHPO | State Historic Preservation Officer |
| TCP | traditional cultural property |
| THPO | Tribal Historic Preservation Officer |
| USFS..... | U.S. Forest Service |
| USR..... | Updated Study Report |
| WISAARD..... | Washington Information System for Architectural and Archaeological Records Data |

1.0 INTRODUCTION

The CR-04 Inventory of Historic Properties with Traditional Cultural Significance Study (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 described in the Revised Study Plan (RSP) submitted by Seattle City Light (City Light) to FERC on April 7, 2021 (City Light 2021). This progress report provides a status update for 2021 and 2022 study efforts. The Properties with Traditional Cultural Significance Study will continue into 2023.

Research for this study is being accomplished through a coordinated effort with nine Indian Tribes and Canadian First Nations working directly with ethnographers of their choice to document and evaluate places of traditional cultural significance that may be eligible as historic properties under National Register of Historic Places and have potential to be affected by activities and/or operations associated with the Project. The study is not yet complete. Indian Tribes and Canadian First Nations are actively coordinating with City Light and consultants for this study and some study participants may find it necessary to do fieldwork or site visits in 2023 to complete documentation of National Register evaluations.

The following Indian Tribes and Canadian First Nations are participating in the Properties with Traditional Cultural Significance Study (listed alphabetically): the Confederated Tribes of the Colville Reservation, the Nlaka’pamux Nation Bands Coalition, the Nlaka’pamux Nation Tribal Council, Nooksack Indian Tribe, Sauk-Suiattle Indian Tribe, Stillaguamish Tribe of Indians, S’ólh téméxw Stewardship Alliance in support of the Sto:lo Nations, Swinomish Indian Tribal Community, and Upper Skagit Indian Tribe. Additionally, City Light has engaged a lead ethnographer team to provide guidance to the study participants and to prepare documentation summarizing the overall results of the study. As described in Section 5.0, the participating Indian Tribes and Canadian First Nations are well underway with the study. Study activities conducted to date include background research, development of research designs, and scheduling and conducting interviews. Study efforts will continue into 2023.

On June 9, 2021, City Light filed a “Notice of Certain Agreements on Study Plans for the Skagit Relicensing”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.

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

On March 8, 2022, City Light filed its Initial Study Report (ISR). The Upper Skagit Tribe requested to modify the Properties with Traditional Cultural Significance Study. FERC's August 8, 2022, Determination on Requests for Study Modifications found that City Light is conducting the study in accordance with the approved study plan and Section 106 criterion and required no modifications to the study.

This progress report is being filed with FERC as part of City Light's Updated Study Report (USR). As described further below, implementation of the Properties with Traditional Cultural Significance Study will continue in 2023, and final results of the work will be included in a study report and filed with FERC when complete.

2.0 STUDY GOALS AND OBJECTIVES

The primary goals of this Properties with Traditional Cultural Significance Study are to ensure that historic properties with traditional cultural significance to Indian Tribes and Canadian First Nations are identified and assessed for potential adverse effects from the 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. As applicable, National Register of Historic Places (NRHP) eligibility determinations will be reviewed by the State Historic Preservation Officer (SHPO) or, for Tribal lands, the Tribal Historic Preservation Officer (THPO) pursuant to 36 CFR § 800.4(c)(2) and 36 CFR Part 800.16(x).

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 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. DAHP concurred with the APE on June 23, 2021.

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, City Light will expand the APE to include these areas. Any proposed updates to the APE will be provided to Section 106 consulting parties in advance for 30-day review and comment period(s) prior to being submitted to DAHP for review and concurrence.

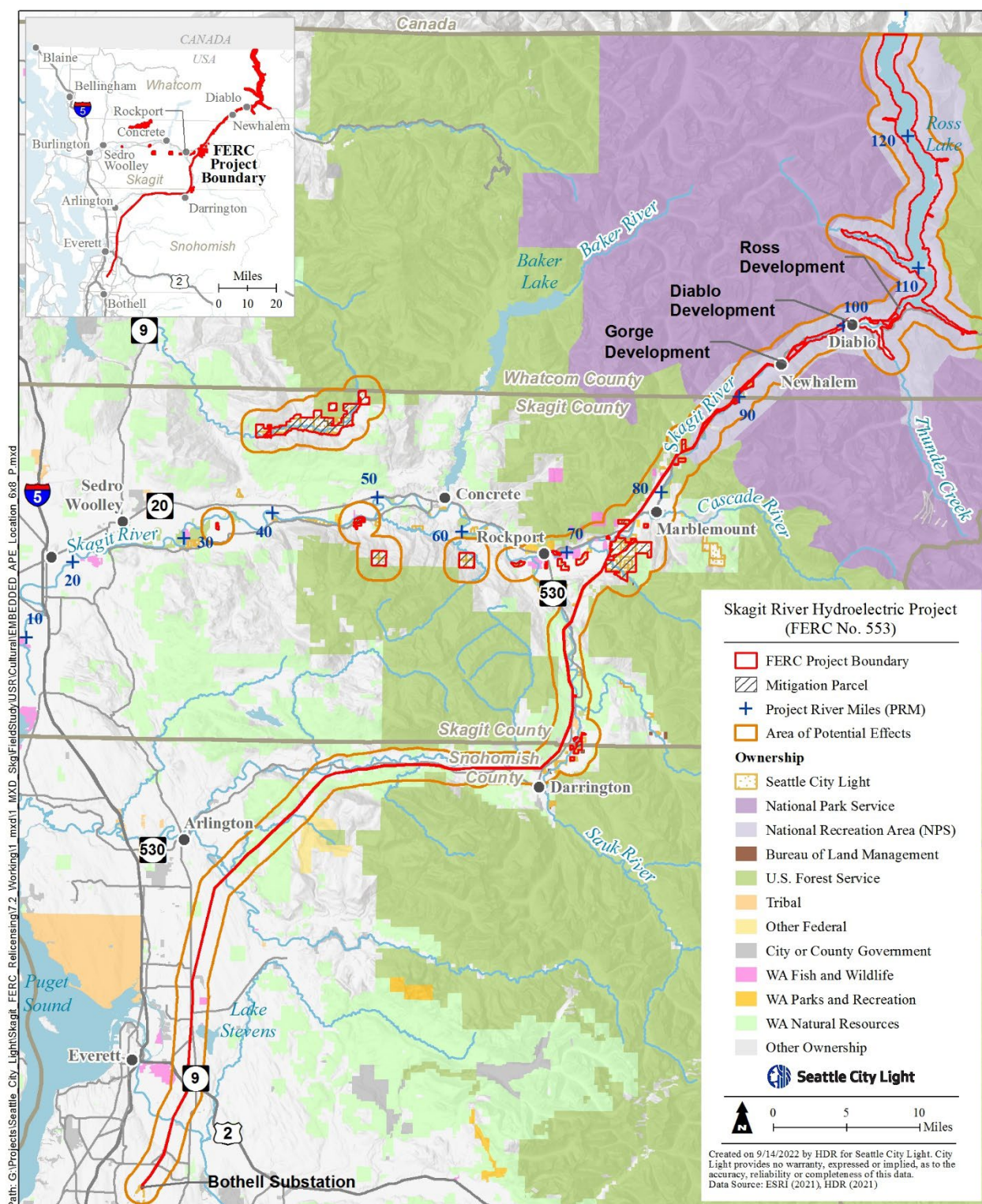


Figure 3.0-1. Location map of the Skagit River Hydroelectric Project APE.

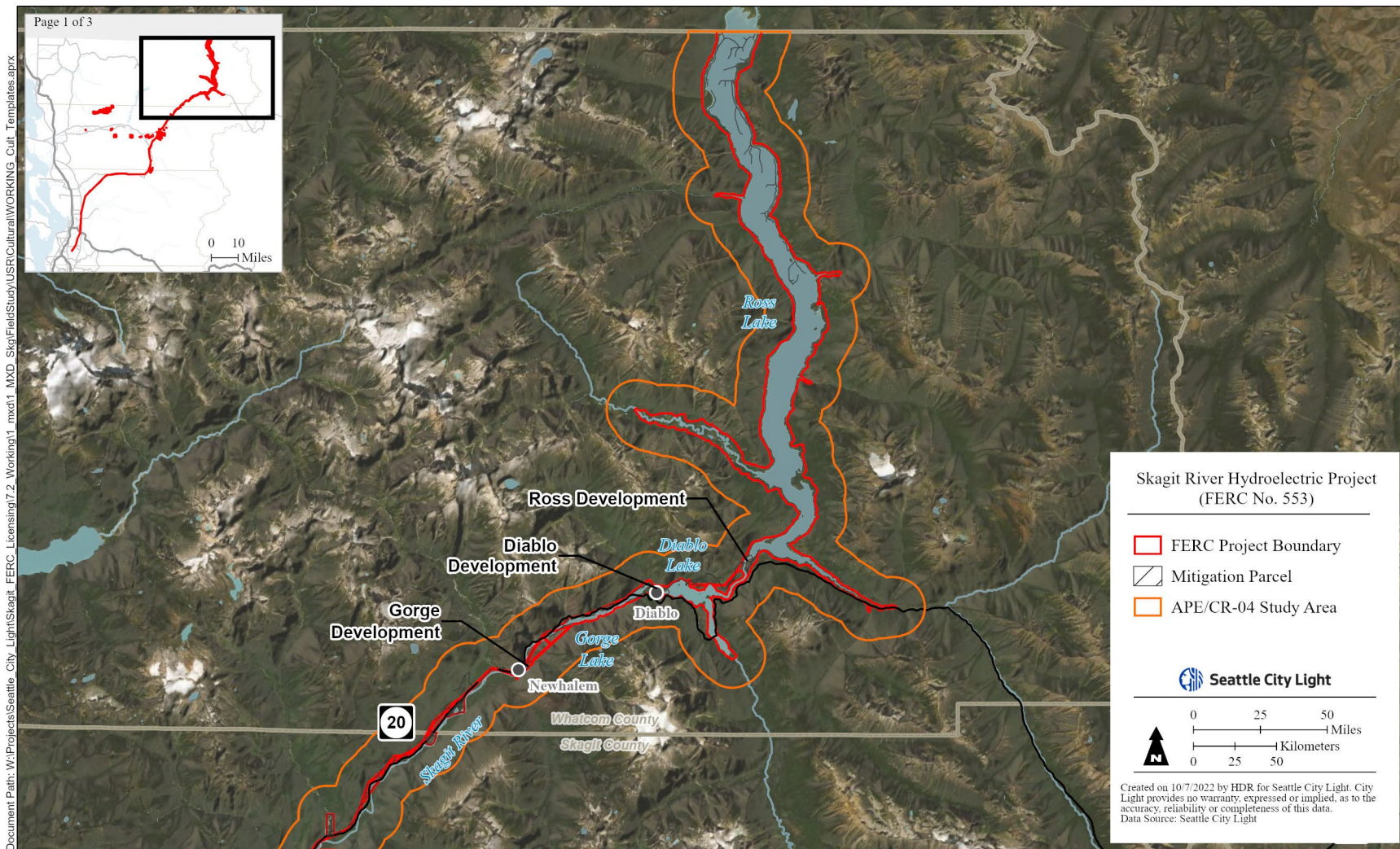


Figure 3.0-2. Skagit River Hydroelectric Project APE and Properties with Traditional Cultural Significance Study Area depicted on aerial imagery (page 1 of 3).

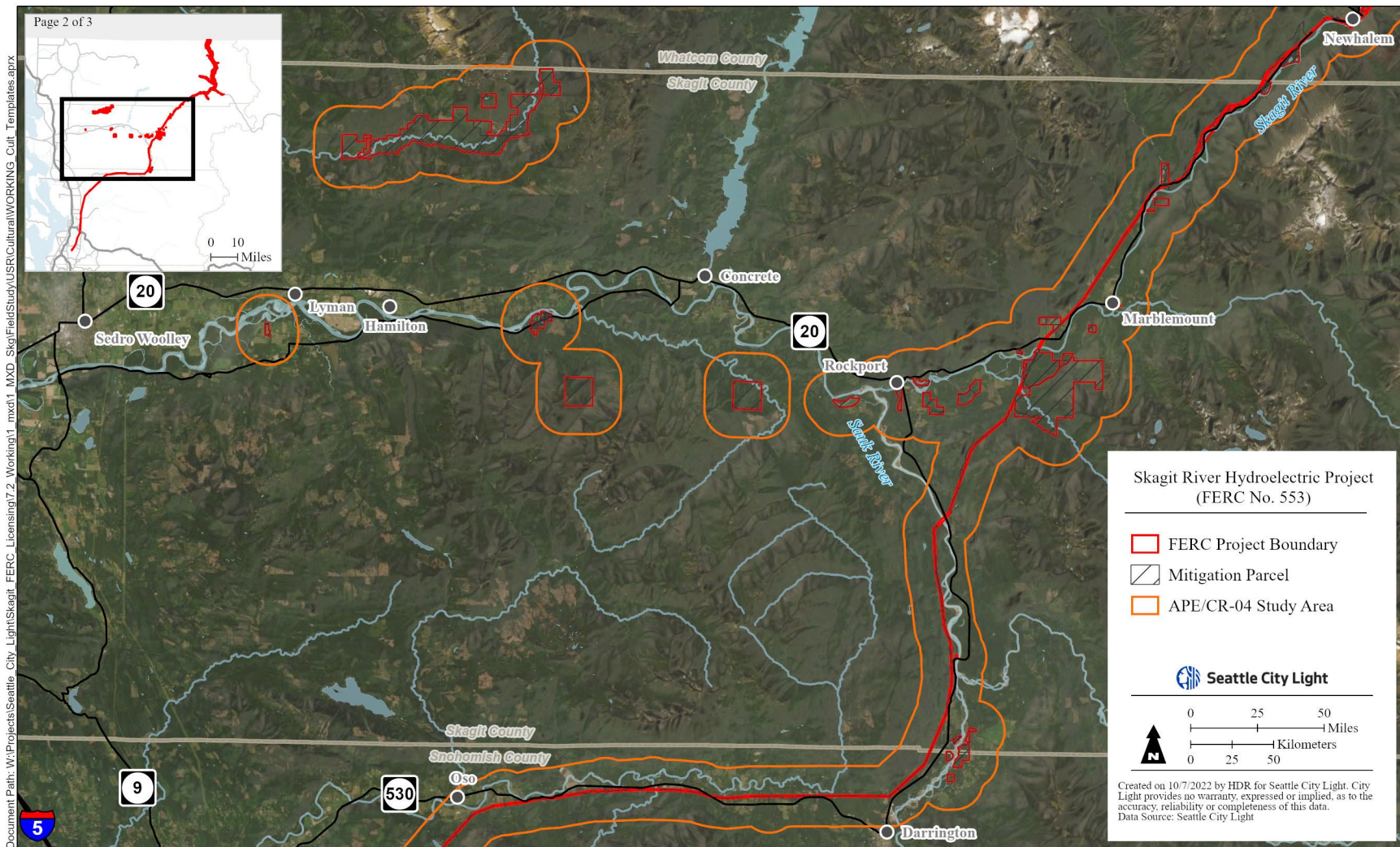


Figure 3.0-2. Skagit River Hydroelectric Project APE and Properties with Traditional Cultural Significance Study Area depicted on aerial imagery (page 2 of 3).

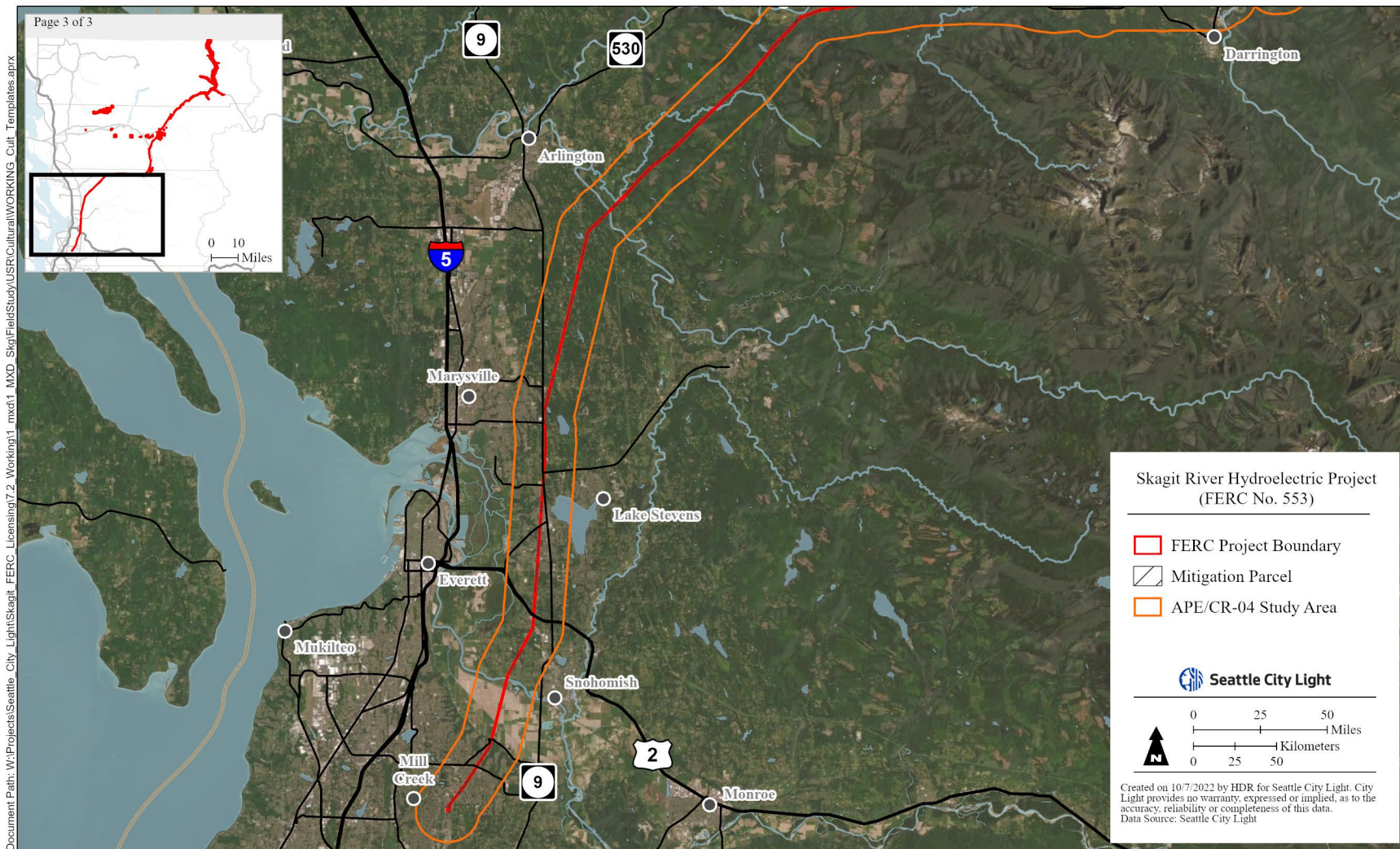


Figure 3.0-2. Skagit River Hydroelectric Project APE and Properties with Traditional Cultural Significance Study Area depicted on aerial imagery (page 3 of 3).

4.0 METHODS

The description of the methodology for the implementation of the Properties with Traditional Cultural Significance Study is provided below and is consistent with the FERC-approved study plan.

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 (Association of American Geographers 2009), with particular attention to Section V. Relations with People, Places, and Things, and subsection 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) Privileged information collected and managed under this study will be returned to the 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 privileged 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 privileged without written permission from the Indian Tribe and/or Canadian First Nation that shared the source records. Further, filings to FERC deemed privileged will be agreed upon in advance by the study participants, so they can be clearly identified as “privileged” and filed with FERC as non-public information. Other federal land managing agencies, such as NPS and the U.S. Forest Service (USFS), will also access some privileged 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 privileged information is disseminated. 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 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 entity that wants to participate in this study to develop the detailed approaches, methods, and sensitivities required by each individual entity 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 may 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 relevant to the goals and objectives of the study, provided by and as deemed appropriate by the participating Indian Tribes and Canadian First Nations. The specific study implementation activities identified below take into account this approach.

4.2 Specific Study Implementation Activities

Step 1: Selection of Ethnographers. For this study, City Light set out to 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 “ethnographers”) to support this study implementation. This step included soliciting input from Indian Tribes and Canadian First Nations to assess the pool of qualified and available candidates, make recommendations for these roles, and state any preferences for working with particular individuals, before City Light made hiring decisions. As a result, ethnographers were selected for this work and are implementing the Properties with Traditional Cultural Significance Study in a coordinated effort with participating Indian Tribes and Canadian First Nations.

Step 2: Indian Tribe/Canadian First Nations Outreach. The ethnographers have now conducted outreach with individual Indian Tribes and Canadian First Nations to 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 Indian Tribe and Canadian First Nation would like to participate, including appropriate protocols for research, engagement, and collaboration; (3) what forms of ethnographic research each study participant deems necessary

for a good faith and meaningful study; (4) processes to develop appropriate agreements/protocols with individual Indian Tribes and Canadian First Nations regarding privileged information; (5) information-sharing protocols, including how data and information will be collected (e.g., by the study participant, 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 have been developing research design in coordination with each participating Indian Tribe and Canadian First Nation that summarizes the outcome of (1)-(6) above in order to meet 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, which will compile the various research designs pertinent to this work for each study participant, will be reviewed by the Section 106 consulting parties, and the final research design will be filed with FERC. Information identified as culturally sensitive by the participating Indian Tribes and Canadian First Nations will be filed as privileged.

Step 3: Ethnohistoric and Ethnographic Data and Information Gathering. The ethnographers will continue to 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 chooses to participate:

- Background research from available archival materials and published ethnohistoric, ethnographic, and 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 or site visits 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, 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;²
- 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 that 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 that 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)³ 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 (ACHP 2019). The ethnographers will document any

² 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 historic properties, it is the intent of this study to focus evaluation efforts on resources’ eligibility for inclusion in the NRHP. It is not the intent of this study to formally nominate properties for listing in the NRHP.

³ 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 consider and manage historic properties.

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 individuals for possible incorporation into the HPMP. These evaluations will be documented in the study reports (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 the historic properties with traditional cultural significance that have been identified through the course of the study within the APE, with focused attention to culturally sensitive and privileged information. 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 in 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 files.

A non-privileged summary of the report findings will be made available to the public and will be filed with FERC by City Light.

5.0 PRELIMINARY RESULTS

This section describes the preliminary results of the study as of September 15, 2022. To accomplish Step 1, the Selection of Ethnographers, as described in Section 4.0 of this document, City Light sought early input from the Indian Tribes and Canadian First Nations regarding ethnographers they recommended for the study at the November 16, 2020, Cultural Resources Work Group (CRWG) meeting and in follow-up emails. City Light then 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. The CRWG provided input to City Light and, based on that guidance and interview outcomes, City Light made its final selection of the lead ethnographers in July/August 2021. City Light then notified the CRWG of the selection of the lead ethnographers in September 2021 and executed all contracts by March 2022. All three lead ethnographers meet the ethnography qualifications outlined in NRB 38, “Guidelines for Evaluating and Documenting Traditional Cultural Properties” (Parker and King 1998). The lead ethnographer team includes the individuals described below.

Co-lead: Joyce LeCompte, Doctor of Philosophy (PhD) (Camassia Resource Stewardship). Dr. LeCompte serves as one of the two co-lead ethnographers along with Mr. Battaglia. The founder and lead of Camassia Resource Stewardship, she has extensive research experience collaborating with the Indian Tribes and Canadian First Nations who have interests in the Project vicinity, as well as with the ethnographic documentation of traditional land and natural resource use. Dr. LeCompte joined the lead ethnographer team in February 2022.

Co-lead: Mario Battaglia, Master of Arts (M.A.) (Algonquin Consultants, Inc.). Mr. Battaglia is the Northwest Regional Manager and Senior Ethnographer in the Cultural Resources Management Division for Algonquin Consultants, an American Indian-owned firm. He provides expertise in ethnography, cultural anthropology, traditional land use studies, and traditional cultural property (TCP) evaluations and nominations to the NRHP. Mr. Battaglia joined the lead ethnographer team in February 2022, serving as one of the two co-leads along with Dr. LeCompte. In addition to his co-lead ethnographer role, he is also serving as the Nlaka’pamux Nation Tribal Council’s ethnographer for the Properties with Traditional Cultural Significance Study.

Senior Advisor: Douglas Deur, PhD (Portland State University). Dr. Deur is a prolific author, research professor of anthropology at Portland State University, and adjunct professor of environmental studies at the University of Victoria. He has conducted ethnographic and TCP studies across the Northwest, as well as Alaska and other parts of the American West. Dr. Deur joined the lead ethnographer team in July 2022. He serves as the lead ethnographer team’s Senior Advisor, providing guidance for the study’s adherence to the Section 106 and NRHP evaluation processes.

Each member of the lead ethnographer team has experience working with Indian Tribes and Canadian First Nations who have interests in the Project and experience documenting historic properties with traditional cultural significance. Throughout the Properties with Traditional Cultural Significance Study process and during all interactions with Indian Tribes and Canadian

First Nations, the lead ethnographer team emphasizes the ethics of relationship building, trust, and open communication (*sensu* Colwell-Chanthaphonh and Ferguson 2004). The lead ethnographer team also employs a collaborative and reflexive framework in all study support and guidance activities, enabling a more flexible and iterative process (*sensu* Davies 1999 and Lassiter 2005). Use of this collaborative framework will be continued throughout the course of the Properties with Traditional Cultural Significance Study.

5.1 The Lead Ethnographer Team’s Work Accomplishments to Date

The lead ethnographer team conducted background research, including reviewing ethnographic and ethnohistoric documents, to better understand the specific contexts of each Indian Tribe and Canadian First Nation participating in the study, and the FERC documents relevant to those contexts and interests. The lead ethnographer team reviewed published ethnographies and ethnohistories, and gray literature technical reports relating to the cultural significance and resources within the vicinity of the Project. Additionally, the lead ethnographers carefully reviewed the CR-01 Cultural Resources Data Synthesis report to help inform the identification of potential TCPs within the APE.

Beginning in February 2022, the lead ethnographer team initiated outreach to each Indian Tribe and Canadian First Nation to begin cultivating an ongoing working relationship for the later steps of study implementation. City Light participated in consultation with these Indian Tribes and Canadian First Nations in advance and advised that these communications were forthcoming. These meetings between the lead ethnographer team and the Indian Tribes and Canadian First Nations occurred in early March through early April 2022 through online video conferences. The lead ethnographer team and City Light continue to meet and communicate regularly with Indian Tribes and Canadian First Nations to facilitate successful implementation of the study.

In addition to introducing study goals and methods, the lead ethnographer team has worked with Indian Tribes and Canadian First Nations to review NRB 38 and other guidance relating to TCP documentation and to assist study participants in formulating research designs that meet the terms of this guidance and are compatible with the expectations, capacities, and protocols for each Indian Tribe and Canadian First Nation. To date, the lead ethnographer team has facilitated and participated in over 20 separate meetings and numerous follow-up phone calls and emails with participating Indian Tribes and Canadian First Nations to provide guidance in the research design development process and support initial study implementation efforts.

On April 20, 2022, the lead ethnographers developed and led a CR-04 Orientation Meeting with Indian Tribes and Canadian First Nations. The CR-04 Orientation Meeting involved a number of thematic presentations meant to assist Indian Tribes and Canadian First Nations in preparing to participate in study documentation efforts. These presentations included examples of TCP studies from across the American West; a discussion of specific TCP documentation efforts from beyond the Project vicinity to serve as examples and sources of methodological guidance; a presentation describing research design elements that are consistent with the FERC-approved study plan; DAHP’s presentation related to use of the TCP form in the Washington Information System for Architectural and Archaeological Records Data (WISAARD); and other aspects of study implementation and reporting. Prior to the CR-04 Orientation Meeting, the lead ethnographer team met with DAHP to discuss DAHP’s development of individual project folders within WISAARD.

for each Indian Tribe and Canadian First Nation participating in the Properties with Traditional Cultural Significance Study. Participating Indian Tribes and Canadian First Nations will submit their TCP documentation forms to these individual folders to limit access to their submitted documents.

In the weeks immediately following the CR-04 Orientation Meeting, the lead ethnographers conducted several follow-up meetings requested by Indian Tribes and Canadian First Nations to answer additional Project-specific questions and assist in the development of their specific research designs. Since that time, the lead ethnographer team regularly reaches out to the research teams for the Indian Tribes and Canadian First Nations as needed to discuss initial research steps, refinement of research plans, and other pertinent tasks in support of their research efforts.

To support and help guide the development of research designs for each of the study participants and subsequent phases of the study, the lead ethnographer team developed documents that could be used as examples for Indian Tribes and Canadian First Nations seeking to develop their own study reports. This resulted in the lead ethnography team producing an “Inventory of Historic Properties with Traditional Cultural Significance Annotated Report Outline” and an “Inventory of Historic Properties with Traditional Cultural Significance Example Report Outline.” These example documents were created at the request of several Indian Tribes and Canadian First Nations and offered to all study participants to assist in the implementation of the study and development of study reports.

Since February 2022, members of the lead ethnographer team have attended three CRWG meetings. The lead ethnographer team presented updates and developments on the study at the CRWG meetings. Additionally, members of the lead ethnographer team attended and participated in regular study coordination meetings with City Light and HDR Engineering, Inc. (HDR) staff. These biweekly meetings enable regular communication and planning throughout the study process and allow the lead ethnographer team to relay information to each participating Indian Tribe and Canadian First Nation concurrently and transparently. Beyond these biweekly coordination meetings, the three members of the lead ethnographer team meet periodically with City Light’s cultural resources lead regarding specific topics or decision points that need direct coordination with City Light to move to next steps. In addition, members of the ethnographer lead team meet regularly to exchange updates and communicate regarding Indian Tribe and Canadian First Nation outreach, study progress, and potential support that could be provided during implementation of the study.

5.2 Study Progress by Indian Tribes and Canadian First Nations

As described below, study participants are in the process of implementing the remaining study steps, Steps 2-6, as detailed in Section 4.0 of this document. The study updates provided below were initially provided to City Light by September 15, 2022, with some additional updates up to September 30, 2022. Below are the updates provided by Indian Tribes and Canadian First Nations that have elected to participate in the study. Most 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 progress report, all ethnographers (lead ethnographers and Indian Tribe and Canadian First Nation ethnographers) are under contract either with HDR or directly with the participating Indian Tribe or Canadian First Nation. The Confederated Tribes of the Colville Reservation, the

Upper Skagit Indian Tribe, and S'ólh Téméxw Stewardship Alliance are conducting their research in-house.

Most of the participating Indian Tribes and Canadian First Nations⁴ submitted study progress summaries, which are provided below. These summaries identify progress on the research design elements described in the FERC-approved study plan, which are detailed below.⁵

Development and Reporting of Research Designs: The majority of research designs are complete⁴ and have been incorporated into a single privileged Research Design summary document prepared by the lead ethnographers and City Light cultural resources team members. Following these reviews and suggested edits, the lead ethnographers will provide the summary document to the participating Indian Tribes and Canadian First Nations for their review. A copy of Indian Tribes and Canadian First Nations' individual research designs will also be provided back to them to share potential changes suggested during the review process and obtain consent to those changes.

No edits to the substance or meaning of individual research designs will be made without the express permission or direction of the Indian Tribe or Canadian First Nation that authored it. City Light reviewers will include City Light's cultural resources team, who have professional training to appropriately view and handle culturally sensitive information. The lead ethnographers will finalize the summary document following review by the participating Indian Tribes and Canadian First Nations. Each participating Indian Tribe and Canadian First Nation will be provided a final copy of the section they authored and the summary document. Cross-sharing of information will be at the discretion of each Indian Tribe and Canadian First Nation and will not be done by City Light.

The final summary document, with individual research designs attached, will be submitted to DAHP and filed in FERC's privileged files. A public-facing synopsis of the summary document will be included in City Light's Section 106 consultation letters related to the DAHP and FERC submittals and will be provided to Section 106 consultation parties.

Background Research: Literature reviews and archival research are initiated for all study participants, and most are well underway. The exception is Nooksack Indian Tribe, who have recently begun archival research to help formulate specific research questions pertinent to their research design. Additional document review and analysis are in progress in most cases, with the exception of the Confederated Tribes of the Colville Reservation, Nlaka'pamux Nation Bands Coalition, and Nlaka'pamux Nation Tribal Council, who have all completed their background research.

⁴ The Nooksack Indian Tribe has recently articulated their interest in participating in the study. City Light and the lead ethnographer team are currently coordinating with the Nooksack Indian Tribe to define their study design and timeline. To date, City Light has had an initial meeting with representatives of the Nooksack Indian Tribe's THPO office, and co-lead ethnographers Battaglia and LeCompte have met twice with representatives of the Nooksack THPO office to help frame their research priorities for the study.

⁵ The Indian Tribe and Canadian First Nation summaries have been updated with a few minor typographical edits for consistency. These changes were approved by each Indian Tribe or Canadian First Nation prior to finalizing the changes.

Ethnographic Interviews: The ethnographic interviews are still in progress with most of the Indian Tribes and Canadian First Nations participating in the study. The Indian Tribes and Canadian First Nations are still in the process of identification of and outreach to potential interviewees. In some instances, prior interviews relevant to the study will also be incorporated into the reports of participating Indian Tribes and Canadian First Nations. The Upper Skagit Indian Tribe plans to use prior elder interviews in its report for this study.

Fieldwork and Site Visits: Certain participating Indian Tribes and Canadian First Nations are currently conducting or plan to conduct fieldwork. A number of study participants are planning to conduct fieldwork in fall 2023, including the Nlaka'pamux Nation Tribal Council, Sauk-Suiattle Indian Tribe, and the Upper Skagit Indian Tribe. The Confederated Tribes of the Colville Reservation, Nlaka'pamux Nation Bands Coalition, and the S'ólh téméxw Stewardship Alliance did not have field visits planned as of September 15, 2022.

Study Report Drafts: Several of the participating Indian Tribes and Canadian First Nations have experienced delays in study implementation beyond their control. These include, in some instances, challenges to executing contracts, Covid-related barriers to working with vulnerable community members, the passing of elders, and the impacts of natural disasters, including fire and flooding, on communities participating in the study. Despite these obstacles, all Indian Tribes and Canadian First Nations contracted with HDR have expressed that they will submit a draft study report no later than October 1, 2023. The lead ethnographer team has encouraged participating Indian Tribes and Canadian First Nations to focus on TCP documentation, boundary delineation, and assessment of eligibility to the NRHP. The lead ethnographer's report that will summarize the findings of the study is expected to be completed in 2024.

5.2.1 Confederated Tribes of the Colville Reservation⁶

The following update was submitted by Crystal Miller, Confederated Tribes of the Colville Reservation TCP Coordinator; and Guy Moura, Confederated Tribes of the Colville Reservation THPO/Program Manager, History and Archaeology Program.

The Skagit Relicensing CR-04 Study TCP contract has been very slow in execution due to contract review by the Confederated Tribes of the Colville Reservation Office of Reservation Attorney having extended dialog with City Light legal team and required revisions to the contract. On August 8, 2022, our legal team approved the contract and we began routing through the Confederated Tribes of the Colville Reservation signature process. On August 18, 2022, Ms. Miller submitted the signed contract to HDR, Inc., for final signature. HDR signed the contract August 30, 2022, and the final contract was received by the Confederated Tribes of the Colville Reservation September 9, 2022.

This is an update for the Confederated Tribes of the Colville Reservation History/Archaeology Program in regard to the Skagit Relicensing CR-04 Study:

⁶ The Confederated Tribes of the Colville Reservation is composed of 12 bands including ščəłáməxʷ (Chelan), s̓xʷyʔilpx (Colville), šntiyátkʷəxʷ (Entiat), sn̓ʔayckstx (Lakes), sp̓aλmuləxʷəxʷ (Methow), škʷáxčənəxʷ (Moses Columbia), Sʔukʷnaʔqín (Okanogan), nspiləm (Nespelem), sn̓pʔawilx (San Poil), šnpəšqʷáwšəxʷ (Wenatchee [sic]), and the Sahaptin speaking bands include the walwáma (Chief Joseph Nez Perce), and palúspam (Palús) (Confederated Tribes of the Colville Reservation 2015; Johnson 2021).

- Research Design is completed; the research design was submitted and accepted by HDR on February 2, 2021.
- Background Research was conducted within History and Archaeology Archives.
- Interviews - no interviews have been conducted to date. We do plan on conducting oral history interviews with our Traditional Knowledge Keepers. We are currently reviewing our database for possible interviewees. Once the list is compiled and reviewed by the Program Manager, we will begin outreach for interview interest and availability.
- Site Visits/Field work - no fieldwork or site visits have been conducted to date.

5.2.2 Nlaka'pamux Nation Bands Coalition⁷

The following update was submitted by Nlaka'pamux Nation Bands Coalition (hereafter Coalition) contracted ethnographer Richard Inglis, M.A.

Overview

There have been significant challenges to setting up this Project including:

- Covid restrictions including closure of Coalition communities to outsiders;
- Widespread forest fires in Nlaka'pamux territory during the summer of 2021, which led to community alerts, evacuations, and health concerns;
- Catastrophic flooding caused by torrential rains in November 2021 that displaced Coalition communities located along the Nicola River and destroyed infrastructure (highways, roads and bridges) to access Coalition communities; and
- The issue of burial sites at Indian Residential Schools.⁸

Leadership of the Nlaka'pamux Nation Bands of the Coalition had to focus on the above issues, many of which are not fully resolved, which added to the already full agenda of dealing with everyday Band governance responsibilities. In addition, there continues to be a lot of anxiety in communities around these issues.

Work to Date

- Ethnographic and historical background research and review completed.
- Revised research design is in review and will be submitted to lead ethnographers by 10/15.

⁷ The Nlaka'pamux Nation Bands Coalition formed in 2022 to stand as a representative body that acts collectively on matters concerning Nlaka'pamux interests. Coalition bands include the Ashcroft Indian Band, Boston Bar First Nation, Coldwater Indian Band, Cook's Ferry Indian Band, Kanaka Bar Indian Band, Nicomen Indian Band, Nooaitch Indian Band, and Siska Indian Band.

⁸ The discovery in 2021 of the burials of Indigenous children at Canada's residential schools that many of the Nlaka'pamux Nation Bands Coalition members attended was a traumatic event that, as noted above, has not yet been fully resolved (Government of Canada 2021).

- Organizational Zoom calls with Coalition leadership to establish community protocols and access for interviews were only partially successful, as leadership was largely focused on the issues above.
- Recently, at a meeting with the Coalition lead, the Project Work Plan was revised to focus on individual Bands rather than the Coalition as a whole.

The Plan is for the Chief (or a person designated by the Chief) of each community to contact their membership via Facebook, newsletter, and/or handout to identify members interested in being interviewed.

- Five members of Coalition Bands were interviewed at the end of July. Another five members of Coalition Bands were interviewed at the end of September.

5.2.3 Nlaka'pamux Nation Tribal Council

The following update was submitted by Pauline Douglas, Nlaka'pamux Nation Tribal Council⁹ Project Manager, after review by the Nlaka'pamux Nation Tribal Council contracted ethnographer Mario Battaglia, M.A.

- 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), based on the 1993 Settlement Agreement between Seattle City Light and the Nlaka'pamux Nation Tribal Council (City Light 1993).
- As part of the Properties with Traditional Cultural Significance Study, and building upon their previous survey, the Nlaka'pamux Nation Tribal Council started their field survey in October 2021. An initial survey in 2011/2012 had shown that while the most densely occupied areas might have been inundated by the Ross Lake Reservoir, very considerably more evidence remained above the high-level water mark and it was important to identify and protect those areas or sites. The cultural survey crew consists of three qualified and experienced Nlaka'pamux, one of whom was the recorder on the 2011/2012 surveys.

The Nlaka'pamux Nation Tribal Council has completed the four sessions of field work planned to continue the survey of Nlaka'pamux cultural sites in the Upper Skagit River Valley, from October 2021, returning to the draw-down in April 2022, and continuing their surveys in June/July and in September 2022.

- During the last survey session, the surveyors ground-truthed in preparation for the Nlaka'pamux Elders visit on September 28th, 2022. Twelve Nlaka'pamux Elders—mostly Nlakapamucheen-speaking from each of the three other major river valleys of the Nation—came to the information meeting on August 30th, 2022, and all attended the trip to Ross Reservoir.

⁹ The Nlaka'pamux Nation Tribal Council was established in the early 1980s. The Nlaka'pamux Nation Tribal Council is a governing entity of the Nlaka'pamux and currently includes the following First Nations: Lytton First Nation, Boothroyd, Oregon Jack Creek (Snepa and Ntequem), and Skuppah Indian Bands.

- In the meantime, the designated database that was designed for the earlier surveys is being updated to include the new information that comes in from every survey.
- Interviews with the Elders and survey crew will take place in October 2022. The project report is expected to be submitted by end December of 2022.
- Study results from the cultural survey and interviews will be reported in forthcoming study reports.

5.2.4 Sauk-Suiattle Indian Tribe

The following update was submitted by Sauk-Suiattle Indian Tribe contracted ethnographer Sara Breslow, PhD.

- **Research Design.** A full draft of the Sauk-Suiattle Indian Tribe Research Design is completed and was approved by the Tribal Council on October 28th, 2022.
- **Archival Research.** To date, 6 regional archives and key sources from a research bibliography have been consulted. In addition, documents pertinent to the Tribe's TCP documentation efforts under the current license are available for analysis for the purposes of the CR-04 TCP study. There may be additional pertinent archival materials at regional university archives.
- **Interviews.** Approximately 8 interviews were conducted for the Tribe's TCP documentation efforts under the current license. 10-20 additional interviews are planned for the current study.
- **Site Visits.** Sauk-Suiattle Indian Tribal members and their ethnographer visited Ross Lake in September 2022 and while there recorded general traditional knowledge about the region. One additional site was visited but observations were not recorded or analyzed.
- **Study Report.** Drafting of the study report has not yet begun.

5.2.5 Stillaguamish Tribe of Indians

The following update was submitted by Kerry Lyste, Stillaguamish Tribe of Indians THPO, in coordination with their contracted ethnographer, Cultural Geographics Consultants, LLC.

- **Research Design:** complete.
- **Background Research/Lit Review:** The Stillaguamish Tribe of Indians has compiled an extensive archive of research materials, including copies of primary source data from various repositories. These materials are under review and additional archival research is ongoing. Literature review is ongoing.
- **Interviews:** The Stillaguamish Tribe of Indians interview participants and identities remain privileged until data has been processed and the sharing of information and identities have been approved following participant review, and if the sharing of information is deemed appropriate by the Stillaguamish Tribe of Indians. Interviews are ongoing.
- **Site Visits/Fieldwork:** Several site visits with Tribal elders and cultural specialists have been conducted and documented; see above for sharing statement. Site visits are ongoing.

- **Study report development:** Ethnohistoric and regulatory and environmental justice content are currently in progress.

5.2.6 S'ólh Téméxw Stewardship Alliance

The following update was submitted by Julian Yates, PhD, Research and Special Projects Manager with the Stó:lō Research and Resource Management Centre of the S'ólh Téméxw Stewardship Alliance.¹⁰

- The S'ólh Téméxw Stewardship Alliance CR-04 Study design is being finalized, following comments on the draft by the lead ethnographers. The CR-04 Study Design is being revised to more explicitly incorporate the methodology outlined in Bulletin 38. The study design includes heritage modelling, archival research, and primary qualitative data collection with S'ólh Téméxw Stewardship Alliance and Upper Skagit Indian Tribe members.
- Progress includes a search and preliminary analysis of archives held at the Stó:lō Research and Resource Management Centre. This search revealed 8 sources (6 unpublished archives; 2 published historical sources) referring to Stó:lō cultural use and properties in the Skagit Valley. These 8 sources point to transit routes, hunting and fishing locations, traditional gathering sites, Stó:lō grave sites, and resource extraction activities. These cultural places and routes will be further researched and mapped to begin drafting the inventory of historic cultural properties, and they will be used as prompts in qualitative interviews.
- The heritage modelling component is underway, with the Heritage Stewardship and Archaeology Unit working with LiDAR data.
- Qualitative interviews are planned for late summer-early fall, with three initial key informant interviews identified and currently being scheduled. Further interviews will be identified through snowball sampling in key informant interviews, and during meetings with Ts'elxwéyeqw and Tiyt Tribe boards and councils.

5.2.7 Swinomish Indian Tribal Community

The following update was submitted by Valentino Villaluz, Hunting and Wildlife Program Manager for the Swinomish Indian Tribal Community, in coordination with their contracted ethnographer, Cultural Geographics Consultants, LLC.

- **Research Design:** complete.
- **Background Research/Lit Review:** These materials are under review and additional archival research is ongoing. Literature review is ongoing.
- **Interviews:** Swinomish Indian Tribal Community interview participants and identities remain privileged. Interviews are ongoing.

¹⁰ The S'ólh Téméxw Stewardship Alliance form a political body that guides engagement and consultation processes within S'ólh Téméxw. S'ólh Téméxw is the halq'eméylem name for the shared asserted territory of the Stó:lō. The S'ólh Téméxw Stewardship Alliance has a total of 17 signatory First Nations including: Chawathil First Nation, Cheam First Nation, Kwaw'Kwaw'Apilt First Nation, Scowlitz First Nation, Seabird Island Band, Shxw'ōwhámél First Nation, Skawahlook First Nation, Skwah First Nation, Sumas First Nation, Yale First Nation, Aitchelitz First Nation, Shxwhà:y Village, Skowkale First Nation, Soowahlie First Nation, Squiala First Nation, Tzeachten First Nation, and Yakwekwioose First Nation.

- **Site Visits/Fieldwork:** Several site visits with Tribal Elders and cultural specialists are in process.
- **Study report development:** Ethnohistoric and regulatory and environmental justice content are currently in progress.

5.2.8 Upper Skagit Indian Tribe

The following update was submitted by Robert R. Mierendorf, Cultural Resource Specialist, Upper Skagit Indian Tribe.

Introduction and Background to the Upper Skagit Indian Tribe's TCP Research

Beginning in the 1980s, well before City Light's consultations and negotiations with the Upper Skagit Indian Tribe prior to the City's application for its current license to operate the Skagit River Hydroelectric Project (FERC-553), and prior to FERC's subsequent issuance of the current license, the Upper Skagit Indian Tribe began to compile and document its historic and traditional knowledge, including Tribal Elder interview information covering its territory along the length of the Skagit River Valley and adjacent watersheds. This work was accomplished through the Tribe's long collaboration with Dr. Bruce Granville Miller, anthropology professor at the University of British Columbia.

The resulting information gathered by Dr. Miller, and subsequently by his student collaborators, Drs. Molly Sue Malone and Bill Angelbeck, have been incorporated into two TCP study reports, one prepared for the Tribe's involvement in FERC's licensing of the Skagit River Hydroelectric Project (Miller and Angelbeck 2006), and the other prepared for Puget Sound Energy's Baker River Hydroelectric Project (FERC-2150) (Miller and Angelbeck 2008). These studies incorporated additional Upper Skagit Indian traditional cultural information from studies also prepared by the National Park Service (Smith 1988), for SCL's current license TCP study (Blukis Onat 1990) and by the USFS for its own planning purposes unrelated to project licensing (Blukis Onat et al. 1980; Blukis Onat and Hollenbeck 1981).

Beginning in 2015, the results of these studies, in combination with much earlier ethnographic and ethnohistoric documents and publications (from the 1950s and later), including the Upper Skagit Indian Tribe's own archival records and photographs, were synthesized into a comprehensive history of the Tribe. The resultant Upper Skagit Indian Tribe Historical Atlas was published and copyrighted by the Tribe in 2019 (Miller et al. 2019). The expressed purpose of the Atlas is to serve the educational needs of present and future generations of Upper Skagit Indians (Schuyler 2019). Production of the Atlas and its publication in 2019 preceded the City's formal Section 106 consultation with the Tribe pursuant to SCL's intent to apply for a new license with the FERC. The Atlas project was funded solely by the Tribe.

In 2016 and using the sources noted above, the Upper Skagit Indian Tribe began documentation of its TCP resources centered on the Skagit River Gorge, a culturally significant natural feature important in the Tribe's origin stories, spirituality and ancestral history. A confidential draft was first prepared using DAHP's TCP template and assigned

TCP number 45WH450. Following review and comment by professional staff at DAHP and the NPS staff, a final template draft incorporated their review comments. In consultation with DAHP and the NPS (the majority landowner), the historic property was additionally documented on a National Register registration form (NPS Form 10-900) as a district property type and in 2019, the North Cascades National Park SC superintendent and the Washington State Historic Preservation Officer signed their concurrence that the Skagit River Gorge and Canyons TCP District meets eligibility requirements of the National Register of Historic Places. The Gorge TCP documentation and significance determination was funded solely by the USIT.

To protect sensitive information, details of the National Register documentation remain confidential. However, the Tribe has shared summary TCP information with Cultural Geographics Consulting, Inc., preparers of the TCP synthesis portion of the CR-01 Cultural Resources Data Synthesis Study (Curti et al. 2020). The Tribe has also shared this information directly with members of City Light's licensing team on two separate field trips in the Newhalem vicinity, within the FERC P-553 project boundary, on 4/22/2021 and 11/2/2021.

Progress on Study Tasks

- Although not called out as such in the introduction above, basic steps of the Upper Skagit Indian Tribe's research began prior to City Light's initiation of its licensing process with FERC and will continue through the preparation and submission to City Light of a research design and a second Upper Skagit Indian Tribe TCP as part of its collaboration with the CR-04 study. The Tribe's progress on CR-04 is outlined below:
- **Background Research/Lit Review:** This task is 98% complete.
- **Interviews:** Few if any new interviews are anticipated considering the Tribe's long history of collaborating with ethnographers to record its Elders' traditional knowledges of the Tribe's ancestral homelands and culture. This task is 99% complete.
- **Site Visits/Fieldwork:** This task is 50% complete. The remaining field visits are to photo document sites along the Skagit River between Damnation Cr. and Baker River.
- **Study report development:** As with 45WH450, the Tribe will document its TCP on the template designed for that purpose by DAHP. Preparation of an initial draft is in progress.
- **Professional Review:** Draft TCP documentation will be reviewed for the Tribe by Dr. Bruce Granville Miller and staff professionals at the NPS and the DAHP.

6.0 SUMMARY AND NEXT STEPS

As noted in the progress reports from Indian Tribes and Canadian First Nations, work is ongoing to gather data and information, document and evaluate historic properties with traditional cultural significance, evaluate Project effects, and complete reporting.¹¹ Additionally, the lead ethnographers are in the process of reviewing research designs from participating Indian Tribes and Canadian First Nations in preparation for a Research Design Summary Report that will be filed with FERC. The final study report(s) will not be filed with City Light's USR in March 2023. The final study report(s) will be filed with FERC, in agreement with predetermined protocols for privileged information, once NHPA Section 106 consultation has been completed for the study report(s). A non-privileged summary of the report findings will be made available to the public and filed with FERC by City Light. A study schedule that has been updated from the RSP is provided below:

- Step 1 – Selection of ethnographers.
 - January – December 2021¹²
- Step 2 – Indian Tribe/Canadian First Nations outreach.
 - December 2021 – March 2022
- Step 3 – Ethnohistorical and ethnographic data and information gathering.
 - January – June 2022
- Step 4 – Historic properties with traditional cultural significance documentation and NRHP evaluation.
 - March 2022 – October 2023
- Step 5 – Consider Project-related adverse effects on historic properties with traditional cultural significance.
 - March 2022 – October 2023
- Step 6 – Reporting.
 - October 2023 – August 2024

¹¹ The exception is the Nooksack Indian Tribe, who are still underway on this step.

¹² After a nationwide 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. DAHP concurred with the revised APE on June 23, 2021.

The second modification consists of an updated schedule for study implementation as provided in Section 6.0 of this progress report. The updated schedule reflects the extensive time and effort spent to select ethnographers and complete fully executed contracts to facilitate the work. The updated schedule includes the subsequently projected schedule for study completion.

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