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August 31, 2018

Kittitas County Community Development Services
411 N Ruby ST, Suite 2
Ellensburg Washington 98926

Dear Sirs and Madams:

Subject: Comments on the Proposed Amendments to Cultural Resource Goals, Objectives, Policies, & Regulations for Kittitas County's Shoreline Master Program.

Sent via email to: [cgs@co.kittitas.wa.us](mailto:cds@co.kittitas.wa.us)

Thank you for the opportunity to comment on the proposed Amendments to Cultural Resource Goals, Objectives, Policies, & Regulations for Kittitas County's Shoreline Master Program. Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has supporters throughout Washington State including Kittitas County.

We appreciate and support the proposed revisions to the policies and regulations. Many historical and cultural sites are in shoreline jurisdiction due to the availability of water, food, and transportation routes. The Washington State Department of Archaeology and Historic Preservation has developed an archaeological predictive model that can predict where archaeological resources are likely to be located and where the department recommends archaeological surveys should be completed before earth disturbing activities and other uses and activities that can damage archaeological sites are undertaken.¹ Many shoreline areas in Kittitas County, and Washington State, are rated "survey recommended: moderate risk," "survey highly advised: high risk," and "survey highly advised: very high risk."²

Addressing archaeological resources upfront before projects begin can save money. For example, the Jefferson County Public Utility District's (PUD) contractor building a community septic system at Becket Point in Jefferson County encountered human bones and Native American artifacts.³ The contractor had to stop construction. An archaeologist was called in and conducted an investigation that allowed the project to be redesigned and to be completed. However, PUD staff "estimated the delays and additional engineering incurred because of the artifacts added about \$90,000 to the

¹ Washington State Department of Archaeology and Historic Preservation WISAARD webpage accessed on Aug. 31, 2018 at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>. The results of the predictive model are available for Kittitas County to use in planning and project reviews from the Washington State Department of Archaeology and Historic Preservation.

² *Id.*

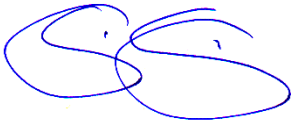
³ Jeff Chew, *Jefferson PUD sticks with Beckett Point Connections* p. 8 (Washington Public Utility Districts Association [WPUDA]: Winter 2008) accessed on Aug. 31, 2018 at: <https://www.yumpu.com/en/document/view/46547248/connections-washington-public-utility-district-association/11>.

project's cost.”⁴ At least some of that money could have been saved by an upfront archeological investigation.

While Futurewise supports the amended policies and regulations, we recommend that site investigations also be required for sites that the Washington State Department of Archeology and Historic Preservation predictive model rates as “survey recommended: moderate risk,” “survey highly advised: high risk,” and “survey highly advised: very high risk” unless the proposed project or activity meets the requirements of proposed regulation 5.1.B.1.a. The investigation should be carried out in consultation with affected Native American Tribes and Nations.

Thank you for considering our comments. If you require additional information, please contact me at telephone (206) 343-0681 Ext. 102 and email: tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich, AICP
Director of Planning & Law

⁴ *Id.* at p. 9.