



Cultural Resource Consultants, Inc.

June 16, 2008

Letter Report #0802F-1

Lisa Berntsen, Program Manager
GeoEngineers
1550 Woodridge Dr SE
Port Orchard, WA 98366

Re: Preliminary Results, Phase II Historic and Cultural Preservation Gap Analysis for the Central Conveyor and Pier (“Pit to Pier”) Project, Jefferson County, Washington

Dear Ms. Berntsen,

Cultural Resource Consultants, Inc. (CRC) has conducted additional investigations for the historic and cultural preservation gap analysis for the above referenced project. The goal of Phase II cultural resources work for the DEIS was to refine and update the previous study (Iversen et al. 2002), and to incorporate relevant findings of more recent cultural resources research in the local area. Investigations to date have included correspondence with Tribal representatives and background research. A final report of investigations will follow our site visit in July 2008.

For the existing study (Iversen et al. 2002), Larson Anthropological Archaeological Services (LAAS) reviewed previously recorded archaeological and historic sites, shipwrecks, and cultural resource studies on file at DAHP in April 2002 (Iversen et al. 2002:Table 1). Additional cultural resources investigations have been conducted in the northern Hood Canal area since then. However, as of February 2008, no cultural resource sites have been recorded within the proposed project. Two cultural resources surveys have been conducted within a two-mile radius of the current project (Ballantyne and Hartmann 2002; Williams 2005a), and one archaeological site (45JE287) has been recorded (Williams 2005b) near the project since LAAS completed their assessment in 2002.

Approximately 1.5 miles northeast of the project, Western Shore Heritage Services (WSHS) conducted a cultural resources assessment for water system improvements at South Point (Ballantyne and Hartmann 2002). The assessment was prepared in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and included background research, field survey, and subsurface testing. Background research identified ethnographic information describing the shoreline of Hood Canal as the ancestral home of the Twana people (Elmendorf and Kroeber 1992; Suttles and Lane 1990), but did not indicate any specific cultural sites in the vicinity of South Point (Ballantyne

and Hartmann 2002:4). Field investigations inspected upland and shoreline areas that would be affected by the water system improvements, and included excavation of auger probes to identify any subsurface archaeological materials. The assessment did not find any evidence of archaeological or historic sites in the project (Ballantyne and Hartmann 2002:7).

In 2005, the United States Department of Agriculture-Natural Resources Conservation Service (USDA NRCS) assisted with a restoration project approximately 0.5 miles east of Shine Pit, at Shine Creek Estuary. That project included replacing culverts with a bridge, and was subject to review for effects to cultural resources under Section 106 of NHPA. Archaeological survey was conducted to identify cultural resources within a ca. 10-acre area along Shine Creek, South Point Road, and a slough east of South Point Road (Williams 2005a:3). This survey identified one archaeological site, the Shine Creek Site (45JE287) (Williams 2005b), which is currently the recorded archaeological site located nearest to the Pit to Pier project. The site was recognizable as a layer of charcoal-stained soil with two pit features exposed in the eroding terrace that forms the south bank of Shine Creek (Williams 2005a:12) but no other cultural materials such as stone tools or faunal remains were found. A broad shallow pit was identified behind the site exposed in the bank but its origin and relationship to the archaeological site remains unknown (Williams 2005b). The site most likely reflects short-term habitation or use as a camp, and at least part of the site has been removed over time by stream erosion and, perhaps, prior road construction (Williams 2005a:13). Williams (2005b) lists the site dimensions as 7.5 meters (m) long on the east-west axis and 3 m across on the north-south axis. Additional testing has not been conducted to delineate site boundaries, but given the nature and size of the observed cultural deposit and its distance from Shine Pit, it is not likely to extend into the current project location. The Pit to Pier project is not anticipated to affect this recorded archaeological site.

In addition to reviewing cultural resources site and studies on file at DAHP, CRC has also consulted recently prepared ethnographic and historical studies (Lane and James 2004; Stauss 2002; Olympic Peninsula Intertribal Cultural Advisory Committee 2002) to identify any information about the project location that has come to light since the existing study (Iversen et al. 2002) was produced. The project is located within the boundaries of lands ceded to the United States under the Point No Point Treaty of 1855, and within the Point No Point Treaty Fishing Usual and Accustomed Area, the area in which rights to fish, hunt, and gather were retained when signatory Tribes (now represented by the Lower Elwha Klallam, the Port Gamble S'Klallam, the Jamestown S'Klallam, and the Skokomish Tribe) ceded their lands to the U.S. The project location, near the entrance to Hood Canal, is in the traditional territory of the Tuwa'duxq (Skokomish Culture and Art Committee 2002:65), referred to elsewhere as "Twana" (Elmendorf and Kroeber 1992), and now known as the Skokomish Tribe. However, the area was also used by the Klallam or S'Klallam people, represented in the present-day by the Lower Elwha Klallam Tribe, the Port Gamble S'Klallam Tribe, and the Jamestown S'Klallam Tribe. For example, S'Klallam would travel to the Hamma Hamma River for seasonal fishing (Stauss 2002:xxv).

The Skokomish Culture and Art Committee (2002) present an overview of Tuwa'duxq cultural history including important places, the Treaty period, the effects of dams and hydroelectric projects on tribal resources and the cultural landscape, and aspects of the contemporary Skokomish Tribe community. The Twana place names nearest to the current project identified by Skokomish elders (Skokomish Culture and Art Committee 2002:67) are *Sivei-ei'he* on the Hood Canal shoreline "west of Port Gamble

Bay,” across the Canal from Squamish Harbor, and *taʔb3xW*, on the northeastern part of Dabob Bay. This discussion does not include any specific places or resources in the vicinity of the project, but “protection of the marine, freshwater, and land resources of Hood Canal” is a priority of the Tribe, due to their importance to Twana life (Skokomish Culture and Art Committee 2002:73-74).

Stauss's (2002) volume on history of the Jamestown S'Klallam Tribe includes contemporary and traditional aspects of the Tribe's culture. Stauss draws on the anthropological literature for the area (e.g., Castile 1985; Gunther 1927; Lane 1993; Waterman 1922) as well as interviews and oral histories of Jamestown S'Klallam people. Although no information specific to the project location is presented, Stauss (2002:13-14) discusses the importance of the physical environment in S'Klallam territory to traditional Jamestown S'Klallam lifeways and the Tribe's present-day economy.

Beckwith et al. (2002) provide a historical overview for the Port Gamble S'Klallam Tribe, focusing on the Treaty period and contemporary community life at Port Gamble. This source does not include any discussion of Port Gamble S'Klallam land or resource use in the vicinity of the project. In the same volume, Bridges and Duncan (2002) summarize information from ethnographic and historical sources pertaining to Jamestown S'Klallam cultural history; resource or land use in the vicinity of the project are not discussed.

Lane and James (2004) prepared a report to describe ethnographic, archaeological, and ethnohistoric information focusing on past S'Klallam use of Port Angeles Harbor and Ediz Hook. The report also discusses the distribution and uses of various natural resources at locations along the Strait of Juan de Fuca and inland areas of the northeastern Olympic peninsula. The relative proximity and accessibility of S'Klallam villages to Tuwa'duxq villages, and the availability of specific plant and animal resources in one territory or the other, facilitated trade between the S'Klallam and the Tuwa'duxq (Lane and James 2004:63). It is reasonable to expect that travel and exchange between Tuwa'duxq and S'Klallam settlements such as the Tuwa'duxq village near the head of Dabob Bay and the Klallam village at Port Ludlow would have included visits, or at least passage through, the project area. While the report provides a comprehensive review of published ethnographies for the area (e.g., Eells 1887; Elmendorf and Kroeber 1992; Gibbs 1855; Gunther 1927), it does not include any place-specific information about the Pit-to-Pier project location or immediate vicinity.

In May 2008, CRC initiated correspondence with cultural resources staff at the Jamestown S'Klallam Tribe, the Lower Elwha Klallam Tribe, the Port Gamble S'Klallam Tribe, and the Skokomish Tribe. The goal of this written communication was to contact tribal cultural resources staff on a purely technical basis, asking for information related to cultural resource concerns and sites in the specific project area, which may not be available in the published archaeological, historical, or ethnographic literature. CRC sought to learn about the types and locations of specific resources of concern, and the potential for the project to affect those specific resources. We were particularly interested to learn the nature of cultural resource issues raised by the Skokomish Tribe. To date, representatives of the above listed Tribes have not responded to CRC's inquiries.

In the public scoping process, the Lower Elwha Klallam Tribe indicated that the proposed project is within Klallam Usual and Accustomed Fishing Areas (D. Morrill, Fisheries Manager, Lower Elwha

Klallam Tribe, 5 October 2007, letter, to M. Farfan, Jefferson County Department of Community Development). Although no cultural resources issues were raised at the time, Morrill (5 October 2007, letter, to M. Farfan) wrote that the Tribe “reserve the right to comment on other potential impacts to other resources important to the tribe at a later date (such as cultural or economic resources).” Representatives of the Port Gamble S’Klallam Tribe noted that the Tribe has “court-affirmed treaty rights to fish and shellfish that include the area affected by the Pit to Pier project” but did not raise any cultural resources issues (P. McCollum, Natural Resources Director, Port Gamble S’Klallam Tribe, and S. Todd, Habitat Biologist, Point No Point Treaty Council, 4 October 2007, letter, to M. Farfan). Representatives of the Jamestown S’Klallam Tribe registered similar economic and natural resources concerns with the project but also did not indicate any potential impacts to cultural sites (S. Chitwood, Natural Resources Director, Jamestown S’Klallam Tribe, 28 September 2007, to M. Farfan).

Representatives of the Skokomish Tribe indicated that the project is located within a “historical landscape” used by the Twana, and that the project would “completely demolish” this landscape (M. Ereth, Skokomish Tribe, 1 October 2007, letter, to M. Farfan, Jefferson County Department of Community Development; K. Miller, Tribal Historic Preservation Officer [THPO], Skokomish Tribe, 3 October 2007, letter, to M. Farfan). The Skokomish THPO refers to two Twana place names in the northern reaches of Hood Canal, *dux ho'bad* and *dux Xa'y* (K. Miller, 3 October 2007, letter, to M. Farfan). As recorded in the published ethnographic literature, these places are located at Squamish Harbor and Hood Head or Whiskey Spit, respectively (Elmendorf and Kroeber 1992:45-46, Map II), and are at least one mile away from the project location. As such, CRC considers the project to have a very low potential to directly impact these specific locations. The Skokomish THPO also refers to the presence of “several landmarks in the Hood Canal area that are still in this present day used and referenced for teaching our children and youth about their ancestors” (K. Miller, 3 October 2007, letter, to M. Farfan). CRC had hoped to learn about the nature and locations of these specific landmarks in order to assess the potential for the project to affect them.

Review of ethnographic and historical information published since the existing study was completed in 2002 has not identified any cultural resources in the location of the proposed project. Tribal cultural resources personnel have not yet responded to CRC's inquiries regarding potential cultural sites or concerns in the project location. In the absence of new data that would suggest the project will directly impact cultural resources, CRC agrees with LAAS's conclusion that the project has a low probability to contain or impact potentially significant cultural resources (Iversen et al. 2002:21-22).

Please consider this letter as a preliminary report of our findings for DEIS Phase II work. Our final report will be available following our field visit, currently scheduled for July 3, 2008. We've appreciated the opportunity to assist with this portion of the project. Please contact our office should you have any questions regarding our report.

Sincerely,

Margaret Berger
Project Archaeologist

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