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## **6.5 ASSESSMENT OF IMPACTS OF PROJECT ALTERNATIVES ON NATIONAL REGISTER ELIGIBLE CULTURAL RESOURCES (CUL 5)**

### **6.5.1 Study Objectives**

The objective of this study is to determine potential project and other land use impacts on National Register-eligible cultural resources, including traditional cultural properties (TCPs), prehistoric and historic archaeological resources, and hydroelectric and non-hydroelectric historic structures. Determining impacts will indicate what protection, mitigation, and enhancement measures might be needed for the Historic Properties Management Plan (HPMP).

### **6.5.2 Study Area**

The primary archaeological and the historic structures Areas of Potential Effect (APEs) essentially follow the FERC Project boundaries. The secondary archaeological APE includes the Merwin Wildlife Habitat Management Area lands. The primary TCP APE extends along the North Fork of the Lewis River from its mouth to its headwaters, including its tributaries and land within 1-mile of the river channel. The secondary TCP study area is bordered by the Columbia River to the south and west, by the Cowlitz River to the north, and by Mt. Adams to the east (HRA 2004; PacifiCorp 1999). The APEs are delineated on maps included in the Study Plan Document (PacifiCorp and Cowlitz PUD 1999, as amended).

### **6.5.3 Methods**

The Applicants will limit evaluation to alternatives to be analyzed in the PDEA. The analysis will include information from the inventory and evaluation of archaeological sites and historical structures as well as consultation with the Cowlitz Indian Tribe (CIT) and Yakama Nation (YN) on their concerns about potential impacts to TCPs and other cultural resources. Among the impacts to be addressed are erosion, unauthorized artifact collecting, some off-road vehicle (ORV) driving, and construction of project facilities, such as those for fish passage, that might affect historical structures.

An analysis will be made of how the alternatives may affect the National Register-eligible cultural resources, or historic properties, and their locations. The results of the preliminary analysis will be the subject of consultation with the CIT, YN, State Office of Archaeology and Historic Preservation (OAHP), and the USFS.

### **6.5.4 Key Questions**

Results of CUL 5 can be used to address some of the following “key” watershed questions identified during the watershed studies meetings:

- Where are the areas that need protection?

Drawdown areas with National Register-eligible archaeological sites need protection, as do the historical buildings and structures near Merwin Dam, at the Swift No. 1 and

Swift No. 2 projects, and the Speelyai fish hatchery. Discussion with the CIT and YN will determine whether proposed project development activities will conflict with TCPs.

- What evidence is available for the existence of previously undocumented and/or unknown sites?

Prehistoric and historic-period archaeological remains, historical buildings and structures, and the knowledge of CIT and YN representatives provide evidence for previously unrecorded sites, as discussed in Sections 6.1 through 6.4 above.

- What are the conditions of known or newly identified sites of cultural, historical, or archaeological importance?

The conditions of the archaeological sites vary, having been affected by reservoir erosion, unauthorized artifact collection, and some off-road vehicle (ORV) driving. The conditions of the historical buildings and structures are generally good.

- Do sites identified in the reservoir areas meet the significance criteria for inclusion in the National Register of Historic Places?

A number of archaeological sites and buildings/structures meet the criteria for National Register eligibility, as discussed in Sections 6.2 through 6.4 above. The Applicants are awaiting information from the CIT and YN about which archaeological sites they believe are eligible based on heritage value.

- Are there 19th or 20th century sites of historical significance that need protection?

One late 19th/early 20th century cemetery site needs protection, as do the National Register-eligible buildings and structures, which date to the 20th century.

#### 6.5.5 Results

Information about project impacts on National Register-eligible cultural resources, or historic properties, has been compiled and discussed with the Cultural Resources Group members. It is considered confidential so is not presented in this public document.

#### 6.5.6 Discussion

The archaeological survey and test excavations revealed previously unrecorded prehistoric and historic-period archaeological sites, while the historical resource inventory also recorded previously undocumented buildings and structures. The knowledge of CIT and YN representatives can provide evidence for potential TCPs; to protect confidential information, the tribes will review specific development plans to identify potential conflicts with TCPs and suggest avoidance or mitigation measures. A number of archaeological sites meet the criteria for National Register-eligibility, along with historic districts at Merwin Dam and the Swift No. 1 projects, and the Speelyai Hatchery. One archaeological site (the cemetery) dates to the late 19th/early 20th century; the National Register-eligible buildings and structures date to the 20th century. The Indian tribes

stated that the prehistoric archaeological sites hold traditional heritage value for them, and these sites will be treated as National Register-eligible until Project effects make it necessary to provide formal determinations of eligibility.

The conditions of the archaeological sites vary, having been affected by reservoir erosion, unauthorized artifact collection, and some ORV driving. The conditions of the historic buildings and structures are generally good. Drawdown areas with National Register-eligible archaeological sites need protection, as do the important historical buildings and structures near Merwin Dam, at the Swift No. 1 projects, and the Speelyai Hatchery. The CIT and YN will determine whether proposed project development activities will conflict with TCPs and recommend measures for avoidance or mitigation.

#### 6.5.7 Schedule

This investigation is complete.

#### 6.5.8 References

Historical Research Associates, Inc. (HRA). 2004. Historic Properties Management Plan for the Federal Energy Regulatory Commissioning Relicensing of the Merwin Hydroelectric Project (FERC No. 935), Swift No. 1, Hydroelectric Project (FERC No. 2111), and Swift No. 2 Hydroelectric Project (FERC No. 2213), Clark, Cowlitz, and Skamania Counties, Washington.

PacifiCorp. 1999. License Application for the Yale Hydroelectric Project, FERC Project No. 2071. Portland, Oregon. April 1999.

PacifiCorp and Cowlitz PUD. 1999. Study Plan Document for the Lewis River Hydroelectric Projects. Draft. Portland, OR, and Longview, WA. October 29, 1999, as amended in 2001.

#### 6.5.9 Comments and Responses on Draft Report

This section presents stakeholder comments provided on the draft report, followed by the Licensees' responses. The final column presents any follow-up comment offered by the stakeholder and in some cases, in italics, a response from the Licensees.

<b>Commenter</b>	<b>Volume</b>	<b>Page/ Paragraph</b>	<b>Statement</b>	<b>Comment</b>	<b>Response</b>	<b>Response to Responses</b>
WDFW – JIM BYRNE	2	CUL 05	National Register Eligible.	Need more input from the Tribes.	The tribes will review the reports on historic structures, traditional cultural properties and archaeological studies as well as participate in the settlement negotiations. We expect their additional input to come from these activities.	