

**STAFF REPORT
SUNSHINE AGRICULTURE
JOINT USE DOCK**

TO: Douglas County Hearing Examiner
FROM: Douglas County Land Services Staff
RE: Sunshine Agriculture Joint Use Dock Facility, SP-07-10
DATE: January 7, 2008

I. GENERAL INFORMATION

Requested Action: Sunshine Agriculture, Inc. has submitted an application for a shoreline substantial development permit for the construction of a joint use dock on the Wells Dam pool of the Columbia River. The Douglas County Public Utility District #1 owns the land on which the dock is proposed. The PUD has provided a letter of authorization to submit the application for review. Sunshine Agriculture has also submitted a short subdivision application to divide the two existing parcels into four residential lots. The proposed dock will serve all four lots. The short subdivision provides access easements for all lots to the dock facility. The dock will extend approximately 54 feet waterward from the ordinary high water mark of the Columbia River.

Location: The subject property is located in a portion of southwest quarter of Section 21, Township 30 N., Range 25 E., W.M. The site is located in the Rural Resource 5 (RR5) Zoning District and the Shoreline is designated as Rural by the Douglas County Shoreline Master Program. The Douglas County Assessor Numbers for the PUD property is 30252130005 and the Sunshine Agriculture properties are listed under parcel numbers 30252130006 and 30252130007.

II. SITE INFORMATION

The property is generally flat throughout with the exception of a near vertical bank approximately 10 feet high adjacent to the river. Shoreline vegetation consists of a narrow fringe, 10 feet wide from the Ordinary High Water Mark (OHWM), along portions of the property. Riparian vegetation was dominated by black locust, willow, and poplars. Beyond the riparian fringe, the vegetation transitions into upland grasses, herbs, and shrub species. At the top of the steep slope is an existing dirt orchard road which runs parallel to the river. The remainder of the property is currently in orchard.

III. COMPREHENSIVE PLAN:

The Douglas County Countywide Comprehensive Plan designates this property as Rural Resource 5 acres. The following goals and policies set forth in the comprehensive plan are relevant to this development:

RURAL:

POLICY RD-4: Development and recreational opportunities in rural shoreline and other rural areas shall minimize potential adverse impacts to water quality, slope stability, vegetation, wildlife and aquatic life.

CRITICAL AREAS – WETLANDS

GOAL 1: Douglas County's wetlands will be protected to the greatest extent reasonable because they provide important functions that help define the quality of life in Douglas County.

POLICY CA-1: Protection and preservation of wetlands shall be preferred to alteration and mitigation of impacts to wetlands.

POLICY CA-2: Wetlands will be rated consistent with the Washington State Department of Ecology's *Wetlands Rating System for Eastern Washington*.

POLICY CA-3: Wetlands will be identified according to the methodology described in the Washington State Wetlands Identification and Delineation Manual, 1997, publication #96-94, as amended.

POLICY CA-4: Wetlands shall include riparian areas from the policies and development regulations. Within Douglas County, the arid climate and vegetation are such that wetlands and riparian areas are so similar, and distinguishable on the landscape that grouping them within the policies and development ordinances is appropriate for the protection of their functions and values.

POLICY CA-6: Wetlands will be protected as much as reasonable from alterations due to land use changes that may create adverse impacts to the wetland.

POLICY CA-10: Development proposals that encompass wetland areas will have a site-specific review process required to determine the classification.

POLICY CA-11: Projects containing a wetland should submit a comprehensive wetland mitigation plan that includes sufficient monitoring and contingencies to ensure natural wetland persistence.

POLICY CA-13: A wetland buffer area of adequate width will be maintained between wetlands and adjacent new development to protect the functions and integrity of the wetland. The ultimate width of the established buffer should be based on the function and sensitivity of the wetland, the characteristics of the existing buffer, the potential impacts associated with the adjacent and proposed land use, as well as other existing regulations which may control the proposed activity.

CRITICAL AREAS – FISH AND WILDLIFE HABITAT CONSERVATION AREAS

GOAL 2: Protect fish and wildlife habitat areas as an important natural resource for Douglas County, particularly in regard to their economic, aesthetic and quality of life values.

POLICY CA-15: Impacts of new development on the quality of land, wildlife and vegetative resources will be considered as part of the environmental review process and require any appropriate mitigating measures. Such mitigation may involve the retention and/or enhancement of habitats.

POLICY CA-16: The maximum amount of vegetation should be maintained in its natural state and be disturbed only as minimally necessary for the development. Disturbed areas should be re-vegetated with native vegetation as soon as possible. Re-vegetation will be maintained in good growing conditions, as well as being kept free of noxious weeds.

POLICY CA 17: If a development proposal is located in or near a habitat conservation area shown on the reference maps, a consultation and subsequent mitigation measures, if needed, should be encouraged from the WDFW or other appropriate agency.

POLICY CA-20: Proper riparian management that maintains existing riparian habitat and is consistent with best agricultural management practices should be encouraged.

POLICY CA-21: Ensure that land uses adjacent to naturally occurring wetlands and other fish and wildlife habitat areas will not negatively impact the habitat areas. If a change in land use occurs, adequate buffers will be provided to the habitat areas.

POLICY CA-22: Activities allowed in fish and wildlife habitat conservation areas and open space will be consistent with the species located there, including all applicable state and federal regulations and/or best management practices for the activity regarding that species.

IV. Douglas County Code

Zoning and Development Standards: The subject property is located within the Rural Resource 5 (RR5) Zoning District. The purpose of this District is to provide an area for a variety of rural lifestyles, hobby farms, densities, and open space, while protecting the rural and resource characteristics in the vicinity.

Applicable provisions and requirements of D.C.C., Chapter 19.18B, "Wetlands"

The property fronts the Columbia River. The wetland and riparian areas of the Columbia River are designated as critical areas and are regulated under Chapter 19.18B "Wetlands". Development, including vegetation removal, occurring within this area and associated buffer areas must develop a wetland management and mitigation plan consistent with the provisions of DCC 19.18B.035.

Applicable provisions and requirements of D.C.C., Chapter 19.18C, "Fish and Wildlife Habitat Conservation Areas"

The Columbia River is designated as critical areas and is regulated under Chapter 19.18C "Fish and Wildlife Habitat Conservation Areas". Development, including vegetation removal, occurring within this area and associated buffer areas must develop a fish and wildlife habitat management and mitigation plan consistent with the provisions of DCC 19.18C.037.

V. SHORELINE MASTER PROGRAM

The Douglas County Shoreline Master Program classifies this portion of the Columbia River shoreline as a Rural Environment. The Rural Environment is defined as those areas, which because of their physical characteristics and present uses, is suitable for agricultural uses, are recreational uses compatible with the agricultural uses. It is intended to serve as a buffer zone between urban areas and protect these areas from intensive urban expansion. The following goals, policies and requirements of the Master Program address the above referenced activity:

SHORELINE GOALS

GOAL 4: To encourage the development of diverse, convenient and adequate recreational facilities along the shorelines of Douglas County, for the primary use of Douglas County residents. Also, to encourage the development of recreational facilities to attract and accommodate visitors, thus aiding economic growth.

GOAL 5: To assure that shoreline use and development in Douglas County is such that all uses are in harmony with each other and with the character and physical limitations of the land and water. To promote the best possible use of the shorelines which will maximize the potential without disrupting environmental quality.

GOAL 6: To assure protection of the non-renewable shoreline resources of Douglas County, and to assure continued utilization and sound management of the renewable shoreline resources, to guarantee their availability in sufficient quality and quantity in the future to meet all foreseeable needs.

SECTION XXI PIERS AND DOCKS

POLICY A: The use of floating docks should be encouraged in order to not interfere with waterlife currents and recreational boaters and fishermen.

POLICY B: Priority should be given to the use of community piers and docks. In general, encouragement should be given to the cooperative use of piers and docks.

POLICY D: Piers and docks should be designed and constructed so as to minimize damage to the fishery resources and their natural food supply.

WASHINGTON ADMINISTRATIVE CODE (WAC)

WAC 173-27 provides updated rules for administering the Shoreline Management Act (RCW 90.58) and the local master program. WAC 173-27-150, establishes minimum review criteria for substantial development permits. This criteria states that a substantial development permit shall be granted only when the proposed development is consistent with:

- The policies and procedures of the Act;

- The provisions of this regulations; and
- The applicable master program adopted or approved for the area.

VI. ENVIRONMENTAL REVIEW

Douglas County issued a Determination of Non-significance on December 27, 2007 in accordance with WAC 197-11-355 (Optional DNS).

VI. AGENCY AND PUBLIC COMMENTS:

Applicable agencies have been given the opportunity to review this proposal. Agency comments have been included as Appendix A. No public comments were submitted on this proposal at the time of staff review. The State Department of Archaeology and the Colville Tribe both sent letters requesting that an archaeological survey of the dock area be completed. The provided a copy of the report and findings that no cultural resources were found.

VII. PROJECT ANALYSIS

Upon review of the application materials, site plans, mitigation plans, public and agency comments, the Douglas County Comprehensive Plan, and applicable codes and requirements, planning staff offers the following analysis and recommendations for the subject application:

Comprehensive plan consistency:

Residential development and recreational opportunities in shoreline areas of the Rural Resource 5 land use designation are reviewed for potential adverse impacts to water quality, slope stability, vegetation, wildlife and aquatic life. Critical area policies place preference on the protection of and preservation of wetlands over the alteration and mitigation of impacts to wetlands. The proposal is consistent with the goals and policies of the Douglas County Countywide Comprehensive Plan.

Consistency with the provisions of the Rural Resource 5 Zoning District, Chapter 18.30, D.C.C.:

Single family residences and their accessory structures are a permitted use in the RR5 zoning district. The proposal is consistent with the provisions of this chapter.

Consistency with the provisions and requirements of D.C.C., Chapter 19.18B, "Wetlands":

The wetland rating and delineation was performed for subject property and a report dated July 2007 was completed by Grette Associates, LLC. The wetland assessment for the shoreline is listed as Category Type IV wetland. DCC

Chapter 19.18.050(B)(7) establishes a 50 foot buffer area for Type IV wetlands as measured from the edge of the wetland.

The construction of a joint-use dock will have impacts to the wetland and associated buffer. Development within wetlands or associated buffers must develop a wetland management and mitigation plan meeting the requirements of Chapter 19.18B, D.C.C. The applicant has submitted a Wetland Management and Mitigation Plan dated July 2007. The Wetland Management and Mitigation Plan address the existing conditions of the site and proposed measures to mitigate for the impact created by the dock facility. The applicant has proposed a total of 670 square feet of mitigation planting to address the 470 square feet of over-water structures and 200 square feet of impact as a result of the access corridor. As conditioned the proposal appears consistent with the requirements of this chapter.

Consistency with the provisions and requirements of D.C.C., Chapter 19.18C, "Fish and Wildlife Habitat Conservation Areas":

The applicant has submitted a Wetland Management and Mitigation Plan, dated July 2007 was completed by Grette Associates, LLC. The plan meets the requirements of Chapter 19.18C, DCC. As conditioned the proposal appears to meet the requirements of this chapter.

Consistency with the Douglas County Shoreline Master Program

The Douglas County Shoreline Master Program goals and policies allow the construction of docks and piers in rural shoreline environments provided that priority is given to "community piers and docks" and that docks do not impede navigation or public safety. The SMP also requires that docks and piers be constructed to "minimize damage to the fishery resources and their natural food supply." The identified wetland buffer areas will protect the water and shoreline characteristics. The proposal is for a joint use dock which reduces shoreline impacts. The proposed development appears consistent with the goals, policies and regulations found in the Douglas County Shoreline Master Program.

Consistency with WAC 173-27 and RCW 90.58:

As conditioned below, the proposed dock appears consistent with the requirements and criteria of the Shoreline Management and Enforcement Procedures, and the Shoreline Management Act.

VIII. RECOMMENDATION

As conditioned below, this application does not appear to be detrimental to the general public health, safety or welfare and meets the basic intent and criteria

associated with Title 18 and 19 of the Douglas County Code, the Douglas County Countywide Comprehensive Plan, and the Douglas County Shoreline Master Program. Staff recommends approval of SP#07-10, subject to the following findings of fact and conditions:

Suggested Findings of Fact

1. The applicant is Sunshine Agriculture, INC.
2. The Douglas County Public Utility District #1 owns the land on which the dock is proposed and have provided a letter of authorization to submit the application for review.
3. The Comprehensive Plan Designation is Rural Resource 5.
4. The subject property is located in the Rural Resource 5 zoning district which allows for single family residences and their accessory structures.
5. The Columbia River Shoreline section of the subject property is designated as "Rural Environment" by the Douglas County Shoreline Master Program.
6. WAC 173-27-150 establishes minimum review criteria for Shoreline Management Substantial Development Permits. This criteria states that a substantial development permit shall be granted only when the development proposed is consistent with the policies and procedures of the Act; the provisions of this regulation; and the applicable master program adopted or approved for the area.
7. Goal 5 of the Douglas County Shoreline Master Program states: Shoreline Use Goal- to assure that shoreline use and development in Douglas County is such that all uses are in harmony with each other and with the character and physical limitations of the land and water. To promote the best possible use of the shorelines which will maximize the potential without disrupting environmental quality.
8. The Douglas County Shoreline Master Program Section XXI states that priority should be given to the use of community piers and docks.
9. Comments from reviewing agencies have been considered and addressed where appropriate.
10. Douglas County issued a Determination of Nonsignificance on December 27, 2007 pursuant to WAC 197-11-355 (Optional DNS).
11. Surrounding property owners were given the opportunity to comment on the proposals.
12. Proper legal requirements were met and surrounding property owners were given the opportunity to comment on the proposal at a public hearing.
13. The subject property is located on the shoreline of the Columbia River and contains riparian and wetland areas regulated under the provisions of Chapter 19.18B Critical Areas-Wetlands.
14. Policy CA-11 of the Douglas County Comprehensive Plan states that projects containing a wetland should submit a comprehensive wetland mitigation plan that includes sufficient monitoring and contingencies to ensure natural wetland persistence.

15. Policy CA-15 of the Douglas County Comprehensive Plan states Impacts of new development on the quality of land, wildlife and vegetative resources will be considered as part of the environmental review process and require any appropriate mitigating measures. Such mitigation may involve the retention and /or enhancement of habitats.
16. The wetland assessment for the shoreline is listed as Category Type IV wetland. DCC Chapter 19.18.050(B)(7) establishes a 50 foot buffer area for Type IV wetlands as measured from the edge of the wetland.
17. The applicant has submitted a Wetland Management and Mitigation Plan prepared by Grette Associates, July 2007, in order to address the requirements of D.C.C. 19.18B.035.
18. The applicant submitted a Cultural Resource Survey dated September 11, 2007 in response to a request from the Washington State Department of Archaeology and Historic Preservation and the Confederated Tribes of the Colville Reservation. The report indicated that no cultural resources were found.
19. WAC 173-27-090 requires that construction must be commenced within 2 years of the effective date of the shoreline permit and that authorization for construction shall terminate 5 years after the effective date of the shoreline permit.
20. As conditioned, the development will not adversely affect the general public, health, safety and general welfare.

Suggested Conclusions:

1. As conditioned, the development meets the goals, policies and implementation recommendations as set forth in the Douglas County Countywide Comprehensive Plan and the Douglas County Shoreline Master Program.
2. As conditioned, this proposal is consistent with applicable federal and state laws and regulations.
3. As proposed, revised, and conditioned, potential impacts of the project can be mitigated.
4. Public interests will be served by approval of this proposal.
5. As conditioned, the proposal is consistent with Title 18 "Zoning" and Title 19 "Environment" of the Douglas County Code.

Suggested Conditions of Approval

1. The project shall proceed in substantial conformance with the plans and application materials of file determined complete on September 5,2007 and except as amended by the conditions herein.
2. Prior to building permit issuance, the applicant shall obtain all necessary permits from agencies with jurisdiction. This may include, but is not limited to: the Washington State Department of Fish and Wildlife (Hydraulic Project Approval), the United States Army Corps of Engineers Regulatory Branch

- (Section 10 &/or 404) the Washington State Department of Ecology (Section 401 Water Quality Certification), Washington State Department of Natural Resources Aquatic Use Authorization and the Chelan Public Utility District.
3. The applicant shall comply with all applicable local, state and federal regulations.
 4. Prior to entering the project area, all equipment shall be checked for leaks and cleaned free of any external petroleum products, hydraulic fluid, machinery coolant, dirt, weeds both aquatic and terrestrial, weed seeds, and/or any other deleterious materials.
 5. A copy of this permit and attached conditions shall be kept on-site and provided to the contractor and all others working within the shoreline area at all times. The applicant, contractor, machinery operators and all others working within the shoreline area shall have read this permit and attached conditions and shall follow its conditions at all times.
 6. The project application shall proceed consistent with the Wetland Management and Mitigation Plan prepared by Grette Associates , dated July 2007.
 7. A permanent means of irrigation shall be installed for the mitigation plantings that is designed by a professional meeting the requirements of Title 20 Douglas County Code. Said design should address the specific needs of riparian and shrub steppe vegetation.
 8. Prior to building permit issuance, the mitigation plantings as discussed in the mitigation plan and depicted on the mitigation planting plan, sheet 6 of 6, shall be installed or a performance surety agreement in conformance with Title 14, D.C.C. shall be entered into between the applicant and Douglas County Transportation and Land Services. Douglas County must approve quotes for the cost of installation, delivery, plant material, soil amendments, irrigation, seed mix and 3 monitoring visits and reports by the biologist or record and Washington State sales tax.
 9. The mitigation site shall be maintained to ensure the management and mitigation plan objectives are successful. Maintenance shall ensure 80% survival during the 5 year monitoring period and shall include corrective actions to rectify problems, include rigorous, as-needed elimination of undesirable plants; protection of shrubs and small trees from competition by grasses and herbaceous plants, and repair and replacement of any dead plants.
 10. A five year monitoring period shall commence upon placement of the planting materials and irrigation system. A performance surety agreement in conformance with Title 14 of Douglas County Code shall be entered into between the property owner and Douglas County Transportation and Land Services. Douglas County must approve quotes for the cost of installation, delivery, plant material, soil amendments, permanent irrigation, seed mix, and 3 monitoring visits and reports by a qualified biologist, and the quotes shall include Washington State sales tax.
 11. Onsite monitoring and monitoring reports shall be submitted to Douglas County Transportation and Land Services 1 year after mitigation installation; 3

years after mitigation installation; and 5 years after mitigation installation. Monitoring reports shall be submitted by a qualified biologist, as defined by Douglas County Code. The biologist must verify that the conditions of approval and provisions in the wetland management and mitigation plan submitted by Grette & Associates, dated July 2007 have been satisfied.

12. Sequential release of funds associated with the surety agreement shall be reviewed for conformance with the conditions of approval and the management and mitigation plan. Release of funds may occur in increments of 1/3 for substantial conformance with the plan and conditions of approval. If the standards that are not met are only minimally out of compliance and contingency actions are actively being pursued by the property owner to bring the project into compliance, the County may choose to consider a partial release of the scheduled increment. Non-compliance can result in one or more of the following actions: carry over of the surety amount to the next review period; use of funds to remedy the nonconformance; scheduling a hearing with the Douglas County Hearing Examiner to review conformance with the conditions of approval and to determine what actions may be appropriate.
13. Where a condition imposed herein may be found inconsistent with the requirements of the Washington State Department of Fish and Wildlife, HPA Permit, or permitting issued by the United States Army Corps of Engineers, the Douglas County Land Services Director shall have discretion to allow for project redesign consistent with the approvals granted by said agencies; if the redesign can be found consistent with the Douglas County Code, the Shoreline Master Program, and the Shoreline Management Act.
14. Substantial progress toward construction of the project for which this permit has been granted must be accomplished within two (2) years of the filing date of this permit. Authorization to conduct development activities granted by the permit shall terminate five (5) years from the filing date of the permit.

Respectfully Submitted,

Stephen Neuenschwander
Senior Planner


Appendix A



**DOUGLAS COUNTY
TRANSPORTATION & LAND SERVICES**

140 19TH STREET NW, SUITE A • EAST WENATCHEE, WA 98802
PHONE: 509/884-7173 • FAX: 509/886-3954
www.douglascountywa.net

LAND USE APPLICATION COMMENT SHEET

DATE: September 26, 2007
TO: Stephen Neuenschwander
FROM:  Don S. Heffner, Building Official
DESCRIPTION OF PROJECT: Two-party Joint Use Dock
APPLICATION #: SP# 07-10
NAME OF APPLICANT: Sunshine Agriculture Inc. (Charles Allison)

The applicant must submit a completed building permit application form and two sets of dock plans, including the concrete bulkhead and stairway leading to the landing, for review and approval prior to commencing site work and construction or installation of the dock. Also include written approval from Chelan PUD, Washington State Fish and Wildlife and the Federal JARPA approval. This is in addition to any other submittals that may have been submitted to Douglas County Land Services.

The applicant has stated on the SEPA Environmental Checklist that filling or grading will not occur.

Stephen Neuenschwander (x432)

From: Williams, Scott (DAHP) [Scott.Williams@dahp.wa.gov]
Sent: Thursday, December 13, 2007 2:05 PM
To: Stephen Neuenschwander (x432)
Subject: Sunshine Agriculture Dock survey report comments

Stephen,

I reviewed the archaeological survey report for the Sunshine dock project, and have no comments on it-- it appears to be complete and there were no archaeological sites or cultural deposits that will be impacted by the project.

Please don't hesitate to contact me if you require additional info.

Thanks,

Scott

Scott S. Williams
Assistant State Archaeologist, Local Governments
Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343
Phone: 360.586.3088



The Confederated Tribes of the Colville Reservation

History/Archaeology Program (509) 634-2693
P.O. Box 150, Nespelem, WA 99155 FAX: (509) 634-2694



September 21, 2007

Douglas County Planning Commission
c/o Stephen Neuenschwander
Douglas County Transportation and Land Services
140 19th Street NW, Suite A
East Wenatchee, WA 98802

RECEIVED

Douglas County TLS

Re: Sunshine Agricultural Dock SP# 07-10

Dear Mr. Neuenschwander:

We are in receipt of your packet of materials related to the above named undertaking. The project is located in the traditional territory of the Okanogan Tribe, a constituent member of and represented by the Confederated Tribes of the Colville Reservation (CCT). Information on Native American use in the project vicinity shows prehistoric, ethnographic, historic, and traditional sites of value to the CCT. These sites are concentrated along the Columbia River. Given the location of the proposed project along the Columbia River shoreline, we consider the potential for undiscovered cultural resources is high. The location of the proposed dock and associated actions may adversely impact yet undiscovered sites.

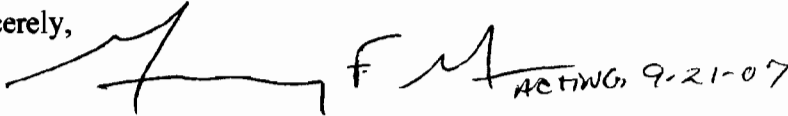
It is difficult to understand the project location as the legal description and the map do not appear to coincided. Under Item # 13 of the SEPA checklist, it states, "No contributing sites are known to be within the project boundaries." Our records indicate there are sites near the proposed undertaking. There is in fact a series of archaeological sites in the vicinity with one occurring in Section 21. There has been a pool raise in Lake Pateros since the last systematic archaeological survey. The proponent's statement also almost implies a project specific inventory was conducted, but we have no such report on file. Since archaeological reports are not publicly available, we are uncertain where the proponent or their agents might have acquired the information about "contributing" archaeological sites.

The SEPA checklist goes on to state that "Contractors and workers will be informed to immediately stop work if artifacts of historical or cultural importance are found." Contractors and workers are not trained to identify artifacts of historical or cultural importance.

We recommend a cultural resources survey to comply with WAC 197-11-080, which specifies if information on significant impacts is not known, agencies shall obtain and include the information in the environmental documents if costs are not exorbitant. When there are gaps in relevant information or scientific uncertainty concerning significant impacts, agencies must state such information is lacking or that substantial uncertainty exists. If the agency proceeds, it shall indicate in environmental documents its worst case analysis and the likelihood of occurrence.

Thank you for your attention to this matter. Please forward a copy of the cultural resource studies completed in conjunction with this undertaking. Contact me at (509) 634-2654 if you have questions or comments regarding our recommendations; contact Guy Moura at 634-2695 for technical questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'Camille Pleasants'. To the right of the signature, the text 'ACTING, 9-21-07' is written in a smaller, less legible hand.

for Camille Pleasants
History/Archaeology Program Manager &
Tribal Historic Preservation Officer

CC Stephanie Kramer, Asst. State Archaeologist, DAHP
Chrono
18151 Correspondence
File (GM)



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
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October 8, 2007

Mr. Stephen Neuenschwander
Douglas County Transportation & Land Services
140 19th St. NW, Ste. A
East Wenatchee, WA 98802

RECEIVED

Douglas County TLS

In future correspondence please refer to:

Log: 100807-41-DO
Property: SP07-10 Columbia River Dock at 59 & 63 Grange Road
Re: Archaeology - Survey Requested

Dear Mr. Neuenschwander:

We have reviewed the materials forwarded to our office for the proposed project referenced above. The property is within the Lake Pateros Archaeological District, a National Register of Historic Places listed property and has high potential for archaeological resources. Further, the scale of the proposed ground disturbing actions would damage any archaeological resources present. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey of the project area be conducted prior to ground disturbing activities. We also recommend consultation with the concerned Tribes' cultural committees and staff regarding cultural resource issues.

If any federal funds or permits are involved Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36CFR800, must be followed. This is a separate process from SEPA and requires formal government-to-government consultation with the affected Tribes and this agency. We would appreciate receiving any correspondence or comments from concerned tribes or other parties concerning cultural resource issues that you receive.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment on this project and we look forward to receiving the survey report. Should you have any questions, please feel free to contact me at (360) 586-3088 or Scott.Williams@dahp.wa.gov.

Sincerely,

Scott Williams
Assistant State Archaeologist
(360) 586-3088

CC: Camille Pleasants, CCT THPO