



Date: 12/07/2018

To: Anne Henning, *Community Development Director*  
City of Othello, WA

Re: Response to comments for East Lee Rd. Parcel Rezone

Ms. Henning,

On December 3<sup>rd</sup>, 2018, I received an email from you stating that two comments were submitted during the 14-day comment period for the proposed rezone. One comment was from WA Dept. of Archaeology and Historic Preservation (DAHP) and the other was from Cascade Natural Gas.

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#### WA DAHP

On 12/06/2018, I had a chance to talk to Mr. Wardlaw over the phone to discuss parts of the comment letter he submitted. Below are the sections of the letter we discussed and my response.

- "As a result of our review, our professional opinion is that the project area has the potential to contain archaeological resources."
  - Mr. Wardlaw explained that DAHP's opinion is based on their database predictive model. The predictive model correlates information about archaeological sites, archaeological surveys, and possible site locations with environmental data to help predict where additional archaeological resources might be found within Washington State. Environmental data includes: elevation, slope %, aspect, distance to water, geology, soils, and landforms. The model puts our project in an area where a survey is advised, but not required. My review of DAHP's WISAARD on 12/07/2018 shows two recent Cultural Resource surveys located 1.16 km NW and 1.33 km SE of the parcels. Also, the nearest known cultural site is 2 km away. In this scenario, Avista Corp would implement an Inadvertent Discovery Plan which has contingencies if cultural resources are found.
- "Further, the scale of the proposed ground disturbing actions would destroy any archaeological resources present."
  - This application is for a rezone only. No ground disturbing activities are proposed.

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### Cascade Natural Gas

Cascade Natural Gas commented that they have a 4" steel main on Lee Road on the south side and one 4" PE service line down Ochoa's property.

- The Natural Gas line along Lee Rd. was located and identified on a previous survey. A utility locate service will be completed prior to any future development on the parcels.

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Thank you for the opportunity to respond to the comments received. Avista Corp requests that the City of Othello not apply any archaeology requirements to the rezone decision for either parcel and recommends the DNS SEPA Threshold Determination remains.



12/7/18

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enc: WA DAHP Letter  
City of Othello Email  
Avista Inadvertent Discovery Plan





## Cultural Resources Inadvertent Discovery Plan

We recommend that the contractor proceed with caution, and that their work be bound by the following conditions.

Condition 1: Inadvertent Discoveries (43 CFR 10.4) - In the event that human remains, burials, funerary items, sacred objects, or objects of cultural patrimony are found during project implementation, the contractor shall cease work immediately within 200 ft. of the find. They shall then take steps to protect the find from further damage or disruption. Then they shall contact Todd McLaughlin at (509) 979-7420 [cell] or (509) 495-2559 [desk] to report the find. The Avista Representative shall contact the appropriate law enforcement authority if human remains are found. No further work shall be allowed on the project until the Avista Representative has approved a plan for managing or preserving the remains or items.

Condition 2: Post-Review Discoveries (36 CFR 800.13) - In the event that prehistoric artifacts (i.e., arrowheads, spear points, mortars, pestles, other ground stone tools, knives, scrapers, or flakes from the manufacture of tools, fire pits, peeled trees, etc.) or historic-period artifacts or features (i.e., fragments of old plates or ceramic vessels, weathered glass, dumps of old cans, cabins, root cellars, etc.) are found during project implementation, the proponent or his authorized agent shall cease work immediately within 200 ft. of the find. Then they shall contact Todd McLaughlin at (509) 979-7420 [cell] or (509) 495-2559 [desk] to report the find. No further work shall be allowed on the project until the Avista Representative has approved a plan for managing or preserving the artifacts or features.

Condition 3: Changes in Project Description - Activities that have the potential to disturb cultural resources outside the areas specified in the reviewed Area of Potential Effect (APE) are not approved and will not proceed until cultural resources review of potential adverse effects in the new area has been completed.

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