3.15 Historic and Cultural Resources

This Programmatic Environmental Impact Statement (EIS) considers the adverse environmental impacts on historic and cultural resources that would result from the types of facilities described in Chapter 2, Overview of Transmission Facilities, Development Considerations, and Regulations. This section addresses the following topics related to the new construction, operation and maintenance, upgrade, and modification of high-voltage electric transmission facilities (transmission facilities) in Washington:

- Section 3.15.1 identifies regulatory, siting, and design considerations.
- Section 3.15.2 describes the affected environment.
- Section 3.15.3 describes the adverse environmental impacts.
- Section 3.15.4 describes Mitigation Measures.
- Section 3.15.5 identifies probable significant adverse environmental impacts on historic and cultural resources.
- Section 3.15.6 provides an environmental sensitivity map and criteria weighting for the siting of transmission facilities as it relates to historic resources, based on the identified considerations, adverse environmental impacts, and Mitigation Strategies.

3.15.1 Regulatory, Siting, and Design Considerations

As part of the Programmatic EIS process, the Washington Energy Facility Site Evaluation Commission (EFSEC) has a responsibility to offer early and meaningful consultation with consulting parties, such as the Washington State Department of Archaeology and Historic Preservation (DAHP), and government-to-government consultation with affected Tribes in Washington. The goal of consultation is to identify and mitigate probable, significant adverse effects on historic properties, cultural resources, and Tribal resources. As required under Revised Code of Washington (RCW) 43.21C.405, EFSEC must prepare a nonproject environmental review of transmission facilities and provide opportunities for engagement of Tribes that elect to participate in the process.

This Programmatic EIS establishes a broad framework for compliance, outlining general laws, regulations, best management practices (BMPs), and design considerations. It is assumed that project-specific applications would be developed within this pre-established regulatory context and comply with existing laws and regulations. Any projects not complying with applicable laws and regulations or failing to adhere to design considerations or BMPs would require additional project-specific environmental analyses and mitigation. The federal and state laws and regulations that apply to historic and cultural resources are summarized in **Table 3.15-1**.

Table 3.15-1: Laws and Regulations for Historic and Cultural Resources

Applicable Legislation	Agency	Summary Information
54 USC § 306108 – Section 106 of National Historic Preservation Act	Federal agencies	Section 106 of the NHPA requires federal agencies to identify the effects of proposed federal undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places. See 36 CFR § 800.16(y) for a definition of a federal "undertaking" and 36 CFR § 800.1 for the applicability of the regulation. This act also requires that federal agencies consult with federally recognized Indian Tribes that attach traditional religious and cultural significance to eligible or listed historic properties that may be affected by the agency's actions.
42 USC § 4321 et seq. – National Environmental Policy Act	Federal agencies	This act requires agencies to prepare a "detailed statement" explaining the environmental impacts of any "major federal action significantly affecting the quality of the human environment," including impacts on historic, cultural, and scientific resources.
16 USC §§ 431–433 – Antiquities Act of 1906	Federal agencies	This act prohibits unpermitted excavation or destruction of "objects of antiquity." In addition, it requires permission to conduct archaeological investigations and remove objects from federal lands from the applicable federal agency with jurisdiction over the federal property (an antiquities permit).
25 USC Chapter 32 – Native American Graves Protection and Repatriation Act	Federal agencies	Since 1990, federal law has provided for the protection and return of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. Updates to the Native American Graves Protection and Repatriation Act were finalized in early 2024 to require that protocols must be followed in the event of inadvertent discovery of cultural materials and human remains on federal lands during any ground-disturbing work.

Applicable Legislation	Agency	Summary Information
16 USC Chapter 1B – Archaeological Resources Protection Act	Federal agencies	This act provides for the protection of archaeological resources[1] on federal and Native American lands. It prohibits the excavation, removal, damage, or alteration of such resources without a proper permit, as well as the sale, purchase, exchange, transport, or receipt of such resources if excavated or removed from lands in violation of this act or any other federal, state, or local law.
16 USC Chapter 11 – Paleontological Resources Preservation Act	Federal agencies	Enacted under the Omnibus Public Land Management Act of 2009, the PRPA provides for the protection, management, and preservation of paleontological resources on federal lands. It prohibits unauthorized collection, excavation, or sale of fossils and establishes permitting requirements for scientific collection. The act also outlines penalties for violations and promotes public education and awareness. Casual collecting of common invertebrate and plant fossils for non-commercial personal use is allowed under specific conditions. The Secretaries of the Interior and Agriculture are responsible for implementing the PRPA on lands under their jurisdiction. 36 CFR Part 291 governs implementation on National Forest System lands.
Executive Order 13007, Indian Sacred Sites	Federal agencies	In 1996, under Executive Order 13007, Indian Sacred Sites, the President ordered the protection and preservation of Native American sacred sites located on federal lands, as well as the accommodation of access to and use of these sites by Tribes facilitated by federal agencies.
State of Washington Executive Order 21-02, Archaeological and Cultural Resources	Washington State agencies[(a)]	This executive order requires agencies to consult with DAHP and affected Tribes regarding the potential effects of projects on cultural resources proposed in state-funded construction or acquisition projects that will not undergo Section 106 review under the NHPA. Agencies must also take all reasonable action to avoid, minimize, or mitigate adverse effects on cultural resources.
RCW 27.44, Indian Graves and Records	DAHP[(a)]	This regulation provides for the protection of Indian burial sites, cairns,[2] glyptic[3] markings, and historic graves in Washington and requires that proper permits be acquired from DAHP ahead of the removal of archaeological material from such sites.
RCW 27.53, Archaeological Sites and Resources	DAHP[(a)]	Archaeological sites are protected in Washington under RCW 27.44 and 27.53. This regulation makes it illegal to knowingly alter, disturb, or remove an archaeological site without the proper permits from DAHP.

[1] Material remains of human activities that can provide information on the behavioral traits and environmental and cultural adaptations of a people.

[2] A human-made pile or stack of stones, often constructed for various purposes such as marking a trail, serving as a memorial, or designating a burial site.

[3] The art or process of carving or engraving, especially on gems or precious stones.

Applicable Legislation	Agency	Summary Information
RCW 68.60, Abandoned and Historic Cemeteries and Historic Graves	DAHP[(a)]	This regulation provides for the protection of abandoned cemeteries and historic graves in Washington and allows DAHP to grant authority to maintain and protect such resources to state or local government agencies or preservation organizations. The regulation also prohibits the unlawful destruction or alteration of any component of a cemetery or historic grave.
RCW 79.11.210, State Land Resource Reservation	DNR	This statute reserves fossil rights to the state on lands it sells or transfers, meaning fossils cannot be collected without a permit. DNR would coordinate with other agencies, such as DAHP, when paleontological resources are involved.
Washington State Environmental Policy Act	▪ Washington State Agencies ▪ Local governments	This act is a process that identifies and analyzes environmental impacts that can be related to issuing permits. SEPA helps applicants and decision-makers understand how a proposed project will impact the environment. Certain projects, as defined in the SEPA Rules (WAC 197-11-704) and that are not exempt, are required to go through the SEPA process.

Notes:

(a) The agency responsible for administering most permits or authorizations for the identified regulation. However, if EFSEC is determined to be the agency responsible for approving a proposal, EFSEC can administer several types of permits at the state and local levels. EFSEC provides a streamlined process for siting and licensing major energy facilities, including transmission facilities in Washington State. EFSEC coordinates all evaluation and licensing steps, specifies the conditions for new construction and operation, and issues a Site Certification Agreement, which assumes the responsibility for issuing individual state or local permits. By consolidating these permits into a single Site Certification Agreement, EFSEC can simplify the regulatory process for energy facility developers. While EFSEC itself does not directly administer federal permits, it works closely with federal agencies to ensure that all necessary federal requirements are met during the evaluation and licensing of energy facilities.

CFR = Code of Federal Regulations; **DAHP** = Washington State Department of Archaeology and Historic Preservation; **DNR** = Washington State Department of Natural Resources; **NHPA** = National Historic Preservation Act; **PRPA** = Paleontological Resources Preservation Act; **RCW** = Revised Code of Washington; **SEPA** = State Environmental Policy Act; **USC** = United States Code; **WAC** = Washington Administrative Code

If federal funding, licensure, permitting, or approval will be required for a project-specific application, applicants must comply with Section 106 of the National Historic Preservation Act (Section 106) (54 United States Code [USC] § 306108). Section 106 mandates that the Washington State Environmental Policy Act (SEPA) Lead Agency "prior to the approval of the expenditure of any Federal funds on the undertaking…take into account the effect of the undertaking on any historic property." A historic property is defined as any "district, site, building, structure, or object that is included in or eligible for inclusion in the National Register" (36 Code of Federal

Regulations [CFR] 800). **Figure 3.15-1** illustrates the four steps of the Section 106 process, the first of which is to initiate the process (36 CFR Part 800.3).

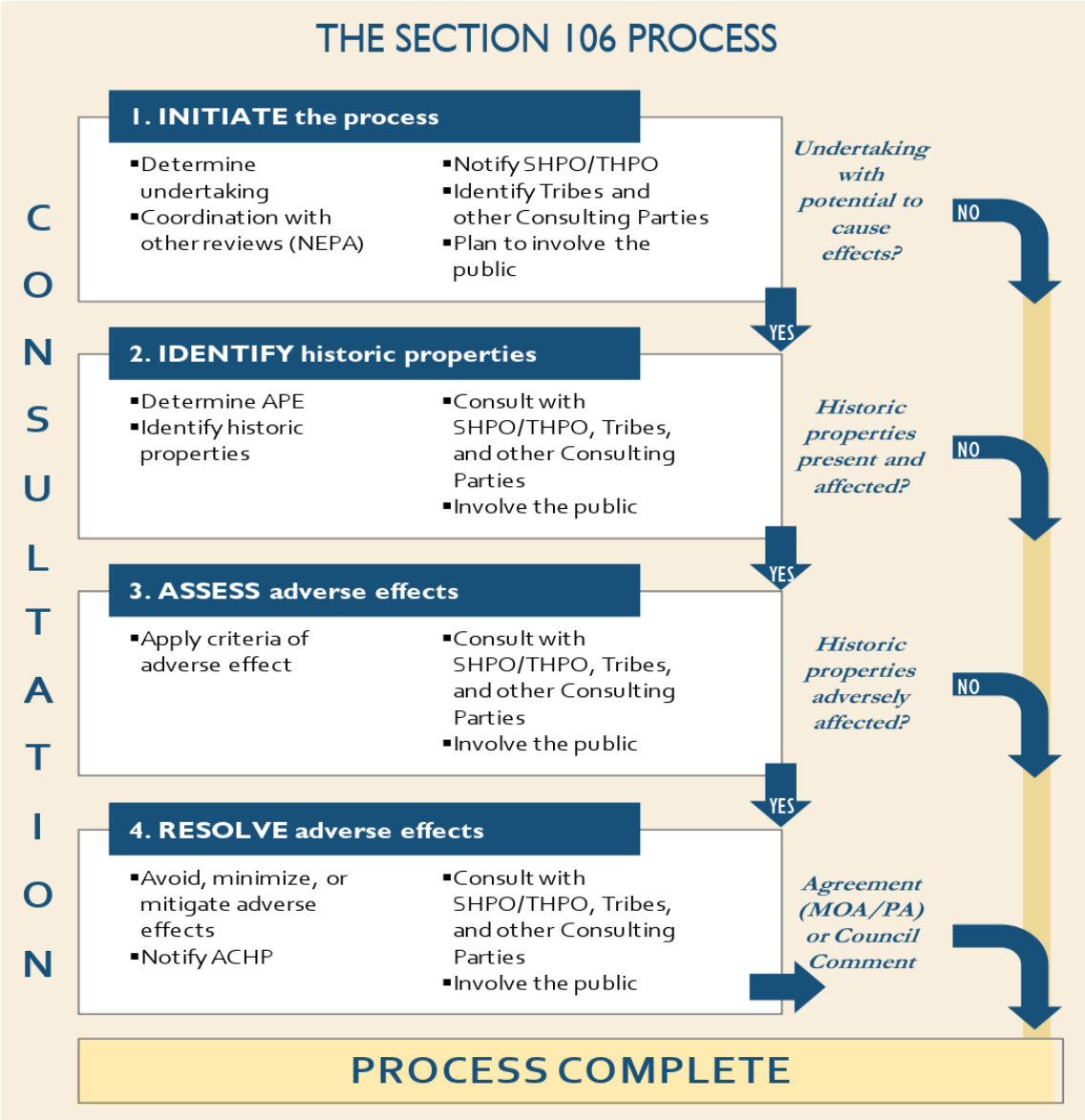

Figure 3.15-1: Steps of the Section 106 Process

Source: CEQ and ACHP 2013

MOA = Memorandum of Agreement;[4] **PA** = Programmatic Agreement;[5] **SHPO** = State Historic Preservation Office; **THPO** = Tribal Historic Preservation Office

[4] A formal document that outlines the specific responsibilities and actions each party will take to achieve a shared goal.

[5] A legal document that outlines how federal agencies will comply with Section 106 of the National Historic Preservation Act (NHPA). This section requires federal agencies to consider the effects of their undertakings on historic properties and to consult with various stakeholders, including State Historic Preservation Officers (SHPOs), Tribal Historic Preservation Officers (THPOs), and the Advisory Council on Historic Preservation (ACHP).

After initiating the Section 106 process, the next step is to identify historic properties (36 CFR Part 800.4). Historic and cultural resources that meet the eligibility criteria for listing on the National Register of Historic Places (NRHP) are termed "historic properties" under the National Historic Preservation Act (NHPA). This step in the process involves several key steps, including determining the area of potential effect (APE); consulting with State Historic Preservation Officers/Tribal Historic Preservation Officers, Tribes, and other consulting parties; and conducting archaeological and architectural surveys to identify historic properties within the APE. Types of historic properties defined in **Table 3.15-2** can be eligible for inclusion in the NRHP under the four criteria listed in **Table 3.15-3**. Each type of property depends on certain aspects of integrity more than others to evaluate its historic significance. Determining which aspect of integrity is most important to a particular property requires an understanding of the property's significance and its essential physical features.

Completion of the identification of historic properties step in the Section 106 process results in one of three findings: a finding of no historic properties affected, a finding of no adverse effects, or a finding of adverse effects (36 CFR Part 800.4(d); 36 CFR Part 800.5). A finding of no historic properties affected is made when no historic properties are present in an APE or when historic properties are present, but the undertaking will have no effect on these properties. A finding of "no adverse effect" is made when historic properties are present, but the undertaking is modified, or conditions are imposed to avoid adverse effects. As defined in 36 CFR Part 800.16(i), an "effect" is an alteration to the characteristics of a historic property that qualifies it for inclusion in or eligibility for inclusion in the NRHP.

Table 3.15-2: Definition of Historic Property Types

Property Type	Definition
District	A district is a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.
Site	A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself maintains historical or archeological value regardless of the value of any existing structure.
Building	A building is a structure created to shelter any form of human activity, such as a house, barn, church, hotel, or similar structure. Building may refer to a historically related complex such as a courthouse and jail or a house and barn.

Property Type	Definition
Structure	A structure is a work made up of interdependent and interrelated parts in a definite pattern of organization. Constructed by man, it is often an engineering project large in scale.
Object	An object is a material thing of functional, aesthetic, cultural, historical or scientific value that may be, by nature or design, movable yet related to a specific setting or environment.

Source: 36 CFR 60.3

Table 3.15-3: National Register of Historic Places Criteria and Relevant Aspects of Integrity

NRHP Criterion	Definition	Aspects of Integrity
A	Properties associated with events that have made a significant contribution to the broad patterns of U.S. history.	A property eligible under Criteria A and B ideally would retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, are not as important as the other integrity factors in determining a property's significance and are not relevant if the property is a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.
B	Properties associated with the lives of persons significant in U.S. history.	
C	Properties that embody the distinctive characteristics of a type, period, or method of construction; that represent the work of a master; that possess high artistic values; or that represent a significant and distinguishable entity whose components may lack individual distinction.	A property determined to be significant under Criterion C must retain the physical features that characterize the type, period, or method of construction that the property represents. Retention of integrity of design, workmanship, and materials is usually considered more important than location, setting, feeling, or association. Location and setting are important, however, for properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges).

NRHP Criterion	Definition	Aspects of Integrity
D	Properties that have yielded, or may be likely to yield, information important in prehistory[6] or history.	For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity typically focuses primarily on the location, design, materials, and workmanship.

Source: 36 CFR 60.4
U.S. = United States; **NRHP** = National Register of Historic Places

Historic properties, which include districts, sites, buildings, structures, and objects, can be adversely affected by transmission facility projects if the project "may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" (36 CFR 800.5). Examples of the types of adverse effects most commonly associated with transmission facility projects include the following, listed in 36 CFR 800.5:

- "Physical destruction of or damage to all or part of the property" (including archaeological sites)
- "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance"
- "Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features"

Other, less common ways that transmission facility projects can adversely affect historic properties include the following, listed in 36 CFR 800.5:

- "Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines"
- "Removal of the property from its historic location"

[6] The period of human history before the invention of writing systems and recorded history. This era encompasses the time from the earliest known use of stone tools by hominins, around 3.3 million years ago, up to the advent of writing, which occurred at different times in different parts of the world.

- "Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization"
- "Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance"

A finding of adverse effects requires resolution of adverse effects via the development and implementation of a memorandum of agreement among participants in the Section 106 process. The parties agree on the appropriate treatment and mitigation measures per 36 CFR 800.6(c).

The siting of transmission facilities is determined by engineering, technical, environmental, and socioeconomic factors. **Table 3.15-4** summarizes guidance documents and management plans that outline the design considerations and BMPs generally used to avoid or minimize adverse environmental impacts on historic and cultural resources.

Table 3.15-4: Siting and Design Considerations for Historic and Cultural Resources

Siting and Design Consideration	Description
Transmission Corridors Work Group Final Report (EFSEC 2022)	The TCWG emphasizes the importance of protecting historic and cultural resources. Their final report highlights several key points, including the following: ▪ Collaboration with Tribes ▪ Environmental analysis[(a)] ▪ Best practices
American Planning Association Policy Guide on Historic and Cultural Resources (APA 1997)	This guide by the APA provides comprehensive policies and best management practices for integrating historic and cultural resource considerations into planning and development projects.
Recommended Siting Practices for Electric Transmission Developers (Americans for a Clean Energy Grid 2023)	This document outlines best practices for siting electric transmission facilities. Recommended practices include: ▪ Early and transparent engagement ▪ Respect and fair dealing ▪ Environmental considerations ▪ Interagency coordination ▪ Use of existing infrastructure

Siting and Design Consideration	Description
WSDOT Model Comprehensive Tribal Consultation Process for the National Environmental Policy Act (WSDOT 2008) and associated appendices	This model provides guidance on designing a comprehensive consultation process with Tribes for projects that require NEPA review. While this document focuses on NEPA, there are several key topics that are pertinent to Tribal engagement under SEPA, including the following: ▪ How to Consult with Tribes ▪ Summary of Usual and Accustomed Areas for Washington Tribes ▪ Consultation Protocols for Each Tribe ▪ Appendices include template consultation letters, sample consultation plans, individual tribal protocols, and additional helpful tools
Early Coordination with Indian Tribes During Pre-Application Process: A Handbook (ACHP n.d.)	This handbook presents recommendations to federal agencies and applicants for working with Tribes in the pre-application information gathering process prior to initiating Section 106. While this handbook focuses on federal agencies, it contains key recommendations that are pertinent to the early planning/pre-application process, including the following: ▪ Develop Relationships with Tribes ▪ Share Documentation Efficiently ▪ Consult Early in Project Planning ▪ Identify a Tribal Liaison ▪ Develop a Tribal Coordination Policy ▪ Consider Contracting with Tribes

Notes:

[a] Applicants must coordinate with DAHP to protect information that is privileged or confidential under Tribal laws.

ACHP = Advisory Council on Historic Preservation; **APA** = American Planning Association; **DAHP** = Washington State Department of Archaeology and Historic Preservation; **EFSEC** = Washington Energy Facility Site Evaluation Council; **NEPA** = National Environmental Policy Act; **SEPA** = State Environmental Policy Act; **TCWG** = Transmission Corridors Work Group; **WSDOT** = Washington State Department of Transportation

3.15.2 Affected Environment

This section describes historic and cultural resources within the Study Area (see Chapter 1, Introduction). The analysis of the affected environment incorporates the following:

- Historic Resources
- Cultural Resources
- Tribal Treaty Rights, Interests, and Consultation

- Paleontological Resources

The types of historic and cultural resources listed or eligible for listing on the NRHP in the Study Area for this Programmatic EIS may include sites, districts, buildings, structures, and objects that are attributed to a wide range of Washington historic contexts/themes, as summarized in **Table 3.15-5**. A historic context that outlines the prehistory, protohistory,[7] historic period[8] history, and ethnohistoric[9] context across Washington is provided in **Appendix 3.15-1**.

Archaeological sites are roughly divided into two categories: historic sites and precontact sites. Within those two categories, there are several site types that are unique but may have some overlapping qualities. It is important to note that sites may contain both precontact and historic-era cultural materials and may be considered multi-component. **Table 3.15-6** provides a brief overview of the many site types recognized by DAHP, a description of each site type that can be considered eligible for inclusion on the NRHP, and the number of currently recorded sites in each category.

Tribal resources refer to a unique category of resource types that encompasses the tangible and intangible heritage of Tribes in the state. They include the collective rights and access to traditional areas and times for gathering resources associated with a Tribe's sovereignty, as well as the inherent rights or formal treaty rights associated with Usual and Accustomed Areas (U&As) (WSDOT 2007; Ecology 2022). These areas are important to traditional cultural practices, such as plants, wildlife, or fish used for commercial, subsistence, and ceremonial purposes. Tribal resources can also include archaeological or historic sites or Traditional Cultural Places (TCPs) associated with Tribal use and sacred sites. TCPs, which are properties associated with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community, are treated as separate resources for purposes of this Programmatic EIS.

[7] The period between prehistory and recorded history. During this time, a culture or civilization has not yet developed its own writing system, but other cultures with writing systems have documented their existence.

[8] The time in human history that begins with the advent of written records. This period follows prehistory, which is characterized by the absence of written documentation. The historic period varies by region, as different cultures developed writing systems at different times.

[9] The study of cultures and indigenous peoples by examining historical records and other sources of information about their lives and history. This field combines methods from both anthropology and history to understand the customs, social structures, and experiences of various ethnic groups, often focusing on those that may no longer exist.

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Table 3.15-5: Historic Resource Types Listed/Eligible for National Register of Historic Places/Washington Heritage Register

Property Type	Description	In Washington	No. of Properties in Washington[(a)]
Domestic	Domestic properties can include single and multi-family residences, associated outbuildings, hotels, group housing, seasonal residences, and sites of habitation.	Like most states, Washington exhibits a wide variety of domestic architectural styles, types, and historic themes; however, some are notable to the Pacific Northwest: Greek Revival, Carpenter Gothic, Victorian, Craftsman, Tudor Revival, and Northwest Modern styles; houseboats and four-square types; and early settlements and rural development. Excellent examples of these properties can be found in designated historic districts and individual buildings throughout the state (DAHP 1989, n.d.[a]; Swope 2005).	923
Commercial	Commercial properties can include office buildings, professional services offices, banks, specialty stores, such as retail shops and grocery stores, restaurants, and commercial warehouses.	Typically, significant commercial properties are recorded in downtown areas and highlight periods of early settlement and development, and subsequent periods of community planning and expansion. They facilitate a wide variety of uses and are constructed in many styles. In Washington, although less represented individually on the NRHP than domestic properties, they are well represented in historic districts.	253
Government	Government properties can include municipal buildings, public service buildings, capitol buildings, post offices, and courthouses.	Similar to commercial properties, government properties are most often linked to the local area served. Given their use, more government properties are designated individually for historic themes, as well as architectural merit, in comparison to commercial properties. Historic fire stations are highlighted among Washington's public buildings in association with firefighting technology in the state. National government themes are also represented in Washington's government buildings, such as border	477

Property Type	Description	In Washington	No. of Properties in Washington[a]
		stations and military bases (also see "Defense" property type below). (DAHP n.d.[a])	
Education	Educational properties can include schools, libraries, research facilities, and other education-related resources such as dormitories or other facilities.	Among the historic educational properties recognized in Washington are a collection of Carnegie Libraries, rural public schools, several community college campuses, and the University of Washington (Garfield and Griffith 1987).	138
Religion	Religious properties can include religious facilities, ceremonial sites, and religious schools and residences.	Historic religious properties must meet criteria that recognize the property for its architectural merit or historic themes judged in purely secular terms. In Washington, while most listed religious facilities are architecturally significant, several former mission sites established in the northeastern corner of the state are listed in the state register and significant for religious history.	112
Social/ Entertainment / Recreational	Social/Entertainment/Recreational properties can include theaters, museums, music facilities, sports facilities, parks, hiking trails, fairgrounds, monuments, and sculptures.	A substantial number of Washington's recreational historic properties are located within National and State Parks and can also be attributed to significant historic landscapes. Social and entertainment properties recorded in Washington include early movie theaters across the state and a limited number of social meeting halls and clubs. (DAHP n.d.[a])	460
Agricultural/ Farmsteads	Agricultural properties can include both individual resources and groupings of resources. Agriculture-related properties can include processing facilities, storage facilities, fields, animal facilities, associated farmhouses, outbuildings, and irrigation systems.	Historic agricultural properties represent a highly significant grouping of property types in the State of Washington, as farming was and remains a cornerstone of the state economy. Among the many individual agricultural properties and district farmsteads, some counties and regions are highlighted for containing important examples: Thurston County, Grain production in Eastern Washington, and Dairy Farms in Snoqualmie River Valley (King County).	348

Property Type	Description	In Washington	No. of Properties in Washington[a]
		Washington also established a program to specifically recognize barns (see below).	
Heritage Barns	A "Heritage Barn," as defined by the Washington State Legislature, is "any large agricultural outbuilding used to house animals, crops, or farm equipment, that is over fifty years old and has been determined by the department [DAHP] to be (a) eligible for listing on the [WHR] or [NRHP]; or (b) have been listed on a local historic register and approved by the advisor council" (State of Washington Legislature Substitute House Bill 2115, Chapter 333, Laws of 2007: Heritage Barn Preservation Program) (Artifacts Consulting, Inc. 2008)	The Washington Heritage Barn Register recognizes barns as a symbol of Washington's agricultural heritage and supports owners in the preservation and stabilization of registered barns. While registration is honorary, these historic resources are considered significant to Washingtonians and should be considered during project environmental analysis. (Artifacts Consulting Inc. and Past Forward Northwest Cultural Resources 2011)	700+ (barns on the Washington Heritage Barn Register)
Industrial	Industrial properties can include manufacturing facilities, mining facilities, water and energy facilities, communication facilities, processing sites, and storage.	Among the many notable industrial achievements in Washington, hydroelectric power stands out. Owing to the state's mountainous topography and major waterways, innovations and advancements in electrification technology are historically well represented. Properties include the Bonneville Power Administration Pacific Northwest Transmission System and 12 other hydroelectric facilities (Soderberg 1988). Other industrial properties of note in Washington include shipbuilding locations and steel manufacturing facilities.	194

Property Type	Description	In Washington	No. of Properties in Washington[a]
Defense	Defense properties can include armories, fortifications, battlefields, military facilities, and aircraft.	The history of defense in Washington is best represented by the naval facilities established along the shorelines. These include the Puget Sound Naval Shipyard National Historic Landmark District and Jim Creek Radio Station. The Fairchild Air Force Base also characterizes Washington's defense-related built environment.	226
Maritime	Maritime properties can include ships, shipwrecks, lighthouses, and other structures, buildings, and objects related to exploration, commerce, naval defense, recreation, navigation, and community development in association with waterways.	The State of Washington stewards a collection of more than 500 historic maritime properties, nearly 50% of which meet criteria for listing in the NRHP (Artifacts Consulting, Inc. 2011)	219
Transportation-Related	Transportation-related properties can include railroads, airports, waterways, roads, bridges, tunnels, and trails.	Washington is noted for its unique collection of 20th-century bridges—in particular, cantilever truss bridges and the Seattle-area floating pontoon bridges. Tunnels are also some of the most notable transportation-related structures in the state (Soderberg 1982; Bruce et al. 1995). Additionally, more than 90 railroads and rail-related properties have been determined as significant historic resources in the state.	230
Funerary	Funerary properties can include cemeteries, other burial sites, and mortuaries.	Cemeteries dominate the significant historic funerary properties in Washington. Only one funeral home is recognized for the historic registers.	40
Landscape	Historic landscapes can include parks, gardens, conservation areas, public square, and natural features.	State and National Parks and Forests are abundant in the state of Washington. They represent historic resources highly characteristic of and unique to the region. Within these landscapes, the history of recreation and conservation (among others) is	34

Property Type	Description	In Washington	No. of Properties in Washington[a]
		represented through a variety of property types including hotels/lodges, bathhouses, and Depression-era fire lookouts, bridges, trails, camps and administrative buildings (Beckham 1978; DAHP n.d.[a]).	

Notes:

[a] Numbers are approximate and based on data from DAHP inventories of historic resources and registered properties.

DAHP = Washington State Department of Archaeology and Historic Preservation; **NRHP** = National Register of Historic Places; **WHR** = Washington Heritage Register

Table 3.15-6: Potentially National Register of Historic Places-Eligible Archaeological Site Types in Washington State

Archaeological Site Types	Description	Number of Recorded Sites in Washington
Historic Bridges	This type includes historic bridges, bridge remnants, bridge footings, and other associated bridge components that are in a state of deterioration and are considered archaeological sites.	364
Historic Rock Cairn/Feature	Historic Rock Cairns can include stacked rock features, placed rocks, rock walls, rock ovens, rock retaining walls, rock trail markers, and other rock stacks or alignments that may be dated to the historic period.	1,114
Historic Camps	Historic Camps may be campsites with historic debris, camps that are associated with historic events, or camps that are associated with historic groups.	264
Historic Cemetery or Burial	This type includes historic cemeteries and burials that are no longer in use for modern interment or that contain historic burials. Historic Cemeteries or Burials may be individual headstone(s) without evidence of a burial(s).	223

Archaeological Site Types	Description	Number of Recorded Sites in Washington
Historic Culturally Modified Trees	Historic Culturally Modified Trees are trees that have been purposefully modified by scarification or by adding cultural objects that can be dated to the historic period. This may include the creation of scars with names associated with early historical figures, dates within the historic period, embedded historic wire, embedded historic nails, and other such historic objects and artifacts.	426
Historic Depression Era Properties	Historic Depression Era Properties include properties associated with the CCC or the WPA. Both the CCC and WPA were established as part of the New Deal program to address the Great Depression's impacts on the United States. Buildings in a state of decay, disrepair, or demolition that are considered archaeological and have an association with the CCC and/or WPA would be considered Historic Depression Era Properties.	136
Historic Districts	Archaeological Historic Districts are districts that contain many historic sites. These may include mining districts, campgrounds, lumber operations, and other site types that might be grouped by associated historical events.	19
Historic Forts	Historic Forts are archaeological sites that are associated with a historic fort.	27
Historic Homestead	Historic Homestead sites contain one or several components of a homestead and may include foundations for homes, outbuildings, fence lines, historic agricultural components, and other indicators of long-term habitation at the site.	1,903
Historic Logging Properties	Historic Logging Properties could include buildings or structures, camps, and other types of archaeological evidence of logging activities.	1,033
Historic Lookouts	Historic lookouts are remnants of lookout structures dating to a historic period.	201
Historic Maritime Properties	Historic Maritime Properties include remnants of maritime-related or fisheries-industry-related buildings, structures, infrastructure, and communications.	140
Historic Military Properties	Historic Military Properties are structures, infrastructure, or other objects related to military activities.	239
Historic Mining Properties	Historic Mining Properties are structures, infrastructure, mines, and other objects related to military activities.	1,965

Archaeological Site Types	Description	Number of Recorded Sites in Washington
Historic Petroglyph	Historic Petroglyphs are petroglyphs[10] that have been created within the historic period. They often contain dates and/or names associated with the historic period or historic individuals.	27
Historic Pictograph	Historic Pictographs are pictographs[11] that have been created within the historic period. Some of the recorded historic pictographs do not have clear dates associated with them and may have ties to the precontact past. Most notably, 45KL00270 is recorded as a historic pictograph site, but descriptions of the site do not associate it with the historic period.	9
Historic Religious Properties	Historic Religious Properties are often churches, graveyards, or other religious built environments. Burial grounds utilized by both early foreign settlers and Native Americans have been identified under the Historic Religious Properties category.	100
Historic Schools	Historic Schools are schoolhouses or sites associated with a school that dates to the historic period.	53
Historic Shell Midden	A shell midden is a collection of shell consumption remnants and a mix of other cultural material that has created a distinct layer in the sediment. A Historic Shell Midden has shell remnants, as well as historic artifacts associated with it.	30
Historic Townsites	Historic Townsites are located where towns were historically occupied but may not contain any current occupants. Notable examples include the Town of Hanford and Hanford Construction Camp (45BN00308).	91
Historic Transmission Lines	This type includes transmission lines that are no longer in use and date to the historic period, or evidence of past transmission lines that have been removed and are only identifiable by artifacts and maps.	43
Precontact Burial	Precontact Burials are known, or suspected, burials used by Native Americans since time immemorial. These are one of the most sensitive site types and should be avoided at all costs.	884

[10] Images created by removing part of a rock surface through methods such as incising, picking, carving, or abrading. These rock carvings are a form of rock art and are found worldwide, often associated with prehistoric peoples. Petroglyphs can depict a wide range of subjects, including animals, human figures, symbols, and abstract patterns.

[11] A visual representation that uses images, symbols, or drawings to convey information or data.

Archaeological Site Types	Description	Number of Recorded Sites in Washington
Precontact Cairn	Precontact Cairns are stacked rock features that are associated with various activities. They can indicate markers for trails, burial sites, or other activities. They are considered highly sensitive sites as they have been shown to be associated with spiritual or religious activities and burials.	1,910
Precontact Camp	Precontact Camps are areas where intermittent use has been documented. Artifact types commonly associated with precontact camps include lithic debitage,[12] fire-cracked rock,[13] projectile points[14] or fragments of projectile points, faunal remains,[15] housepit depressions,[16] beads, and shell midden.	4,393
Precontact Cave Site	Precontact Cave Sites are caves that have evidence of use in the precontact past.	124
Precontact Culturally Modified Trees	Precontact Culturally Modified Trees are trees that have been bent, scarred, peeled, or modified in some manner in the precontact past. These trees were used to mark certain areas or paths, were peeled for their bark for basketry or other crafts, and are present throughout Washington.	682
Precontact District	Precontact Districts are archaeological districts where a high density of precontact sites is recorded. Many of these districts are located along the Columbia River and its tributaries. These sites may or may not be connected through use type, chronology, or spatial patterning. This category also records individual sites associated with precontact districts.	26

[12] The waste material produced during the process of creating stone tools.
[13] An archaeological term that refers to rock that has been cracked or split as a result of deliberate heating.
[14] An archaeological term to describe the pointed end of a weapon that was designed to be thrown or projected, such as a spear, dart, or arrow. These points are typically made from materials like stone, bone, metal, or even glass.
[15] The physical evidence of animals that have been left in the archaeological record. These remains can include bones, teeth, shells, hair, scales, hides, and even proteins like DNA. They help understand past human-animal interactions and environmental conditions.
[16] Archaeological features that represent the remains of ancient dwellings, typically semi-subterranean houses. These depressions are often circular or oval and are found in various regions around the world, including North America.

Archaeological Site Types	Description	Number of Recorded Sites in Washington
Precontact Feature	Precontact Features are archaeological features on the landscape that may be grouped together into a single site. This might include a lithic scatter[17] with a fire-cracked rock feature and several cairns that are all spatially associated.	1,194
Precontact Fishing Station	Precontact fishing stations are known locations where fishing activities occurred in the precontact past. Archaeological materials associated with fishing stations include fish traps, fish weirs,[18] camps located at ideal fishing locations, housepit depressions, fishing implements and artifacts, and fish remains. These types of sites can be located along the coast, rivers, and creeks where fish populations could be supported.	113
Precontact Housepit	Precontact Housepits are semisubterranean homes where a circular depression was excavated and had several support poles and a roof over the depression. Housepits can be found throughout the Columbia Plateau region and may occur as an isolated housepit or multiple housepits in one area.	535
Precontact Petroglyphs	Precontact Petroglyphs are petroglyphs that were created in the precontact era. These are sometimes isolated occurrences or are found in association with larger site complexes. They may be found on rocks, columnar basalt,[19] or boulders throughout various areas of Washington.	349
Precontact Pictographs	Precontact Pictographs are pictographs that were created in the precontact era. They are sometimes isolated occurrences or are found in association with larger site complexes. They are found on rocks, columnar basalt, or boulders throughout various areas of Washington.	364
Precontact Rock Alignment	Precontact Rock Alignments are rocks that have been purposefully placed in a line, usually two or more courses high, and do not appear to be associated with any historic use. These rock alignments can be found alone or can be associated with larger archaeological sites or other precontact artifacts.	771
Precontact Rock Shelter	Precontact Rock Shelters are overhangs of rock that would have allowed people to either temporarily camp in these locations or stash supplies.	650

[17] An archaeological term for an area with a concentration of stone tools and debris from tool-making activities.
[18] A fence, dam, or other enclosure set in a stream or river for capturing fish.
[19] A type of rock that has standing vertical columns.

Archaeological Site Types	Description	Number of Recorded Sites in Washington
Precontact Shell Midden	Precontact Shell Middens are remnants of shell consumption that are concentrated within a discrete area and create a distinct lens in the stratigraphy.[20] On the coast, shell middens also contain charcoal, faunal remains, artifacts, and burials. Shell middens on the coast can range from small, single-consumption events to large features that are visible on the landscape. They are often seen as prominent displays of connection between the people and the land. In the Columbia Plateau, shell middens can range from small, single-consumption events to larger shell middens that have been collected over time. In the plateau, burials in shell middens are not seen; however, it is always possible that looting activities and inundation from the dams have erased any evidence of burial practices in shell middens. These are highly sensitive sites that should be avoided at all costs.	2,319
Precontact Talus Pits	Precontact Talus Pits are depressions created in talus slopes that may indicate past activities, including, but not limited to, caching supplies, burials, and hunting blinds. Given their association with burials, avoidance is recommended.	1,288
Precontact Trail	Precontact Trails are trails that were used by indigenous people in the precontact and protohistoric past. These trails may be documented on early ethnographic accounts; however, they have often been used for generations prior to non-indigenous settlers' arrival. Trails may be marked by Culturally Modified Trees, rock alignments, rock features, or other archaeological site types.	42
Precontact Village	Precontact Villages are sites where evidence of larger populations of individuals was living throughout the year or seasonally. On the Columbia Plateau, several housepit depressions, lithic scatters, storage pits, talus pits, suspected burials, cairns, hearth features, and other archaeological features may be associated with villages. On the coast, one or more house depressions, large shell middens, burials, and other archaeological features are often associated with villages. Village sites may be ethnographically documented, but have been important places in the landscape for generations.	382

CCC = Civilian Conservation Corps; **WPA** = Works Progress Administration

[20] A branch of geology that classifies and interprets rock layers.

3.15.2.1 Historic Resources

As outlined in the previous section, there is a wide range of historic properties that could be physically and visually impacted by transmission facilities in Washington. While it is the responsibility of applicants to identify all historic properties within the APE of an undertaking as part of the Section 106 process, there are certain historic properties that are more likely to have adverse environmental impacts that are unavoidable after standard mitigation, including National Historic Landmarks (NHLs), historic districts, farmsteads, and parks and historic districts within parks. These properties are more likely to have setting and feeling as important aspects of integrity that can be diminished by transmission facility projects in several ways. New construction or disturbance within a historic property boundary can physically impact features that contribute to the significance of the historic property, such as trees, landscaping, fences, walls, and gates, to name a few. New construction of overhead and underground facilities within the boundary of a historic property can also be considered a visual intrusion in the immediate setting of a historic property. New construction of these facilities outside the property boundary but within the viewshed of historic properties can result in visual changes that may adversely affect the setting and feeling of a historic property, even though these facilities may be far removed from the historic property.

There are also approximately 64 NRHP-eligible transmission facilities in the state that could be impacted if selected by an applicant for upgrade or modification (DAHP n.d.[b]).

All of these properties should be considered during the planning and siting stages of project-specific applications. The properties are presented below in order of most to least likelihood of setting and feeling being critical aspects of a historic property's integrity based on professional knowledge and experience.

National Historic Landmarks

NHLs are designated by the Secretary of the Interior under the authority of the Historic Sites Act of 1935, which authorizes the Secretary to identify historic and archaeological sites, buildings, and objects that "possess exceptional value as commemorating or illustrating the history of the United States." **Table 3.15-7** lists the NHLs in Washington. Section 110(f) of the NHPA requires that the SEPA Lead Agency, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any NHL that may be directly and adversely affected by

an undertaking. Special requirements for protecting NHLs, as stated in 36 CFR § 800.10, must be followed, including participation of the Advisory Council on Historic Preservation to resolve adverse effects on NHLs. In addition, the SEPA Lead Agency should consider all prudent and feasible alternatives to avoid an adverse effect on an NHL. NHLs should be identified during the planning period of project-specific applications to avoid constructing overhead and underground transmission facilities within the viewshed and/or boundary of NHLs.

Table 3.15-7: National Historic Landmarks in Washington

County	Landmark
Benton	Hanford B Reactor
Franklin	Marmes Rockshelter
Jefferson	Fort Worden, Port Townsend Historic District
King	*Adventuress* (Schooner); *Arthur Foss* (Tugboat); *Duwamish* (Fireboat); Lightship No. 83 "Relief"; Panama Hotel; Pioneer Building, Pergola, and Totem Pole; Seattle Electric Company, Georgetown Steam Plant; *Virginia V* (Steamboat)
Kitsap	Port Gamble Historic District; Puget Sound Naval Shipyard
Pacific	Chinook Point
Pierce	*Fireboat No.1*; Fort Nisqually Granary; Longmire Buildings; Mount Rainier National Park; Paradise Inn; Yakima Park Stockade Group
San Juan	American and English Camps, San Juan Island
Skagit	*W. T. Preston* (Snagboat)
Skamania	Bonneville Dam Historic District

Source: NPS 2024
NPS = National Parks Service

Transmission Facilities

At least 64 transmission facilities in Washington are eligible for or listed in the NRHP (**Table 3.15-8**) (DAHP n.d.[b]). Many of these facilities are associated with the Bonneville Power Administration (BPA), which has its own Cultural Resources Program to address the operation and maintenance of historic properties within its transmission facilities. Transmission facilities are eligible/listed under a variety of different NRHP criteria. The adverse environmental impacts on this historic resource type should be carefully considered when direct impacts are anticipated, including upgrading of a historic transmission line or co-locating a new transmission facility within the same right-of-way (ROW). Because of the variability of NRHP eligibility criteria for transmission facilities, this programmatic assessment does not include guidance on upgrading historic transmission facilities or co-locating new facilities within the same ROW.

These types of projects should be analyzed on a project-specific basis. The following resources were developed specifically for BPA historic properties and may be useful:

- *Programmatic Agreement among the Bonneville Power Administration, the Oregon State Historic Preservation Office, the Washington State Historic Preservation Office, the Idaho State Historic Preservation Office, the Montana Historic Preservation Office, and the Advisory Council on Historic Preservation to Address Effects to BPA Transmission Lines (DRAFT) Programmatic Agreement among the Bonneville Power Administration, the Oregon State Historic Preservation Office, the Washington State Historic Preservation Office, the Idaho State Historic Preservation Office, the Montana State Historic Preservation Office, and the Advisory Council on Historic Preservation to Address Effects to BPA Transmission Lines (DRAFT)* (BPA n.d.)
- *Bonneville Power Administration Manual for Built Resources, 2020* (BPA 2020)
- *National Register of Historic Places Multiple Property Documentation Form: Bonneville Power Administration (BPA) Pacific Northwest Transmission System* (Kramer 1992)
- *Corridors of Power, The Bonneville Power Administration Transmission Network, Historic Context Statement,* 2010 (BPA 2010)

Table 3.15-8: List of National Register of Historic Places/Washington Heritage Register Eligible Transmission Facilities in Washington

County	Transmission Facility
Multiple	McNary–Franklin No. 2 Transmission Line
Multiple	Olympia-Grand Coulee No. 1 Transmission Line
Multiple	BPA Sickler-Shultz No. 1 Transmission Line
Adams	Pacific Power & Light/Washington Water & Power Benton-Othello No. 1 Transmission Line
Benton	Benton-Othello No. 1 Transmission Line
Benton and Franklin	Bonneville Power Benton-Scooteney No. 1 Transmission Line
Clallam	Port Angeles-Sappho No. 1 Transmission Line
Clark	BPA Vancouver-Covington Transmission Line; Ross-Lexington No. 1 Transmission Line; BPA Ross-Lexington Transmission Line; BPA Vancouver-Covington Transmission Line; Ross-Alcoa No. 2 Transmission Line; Ross-Vancouver Shipyard No. 1 Transmission Line; Ross-Carborundum No. 1 Transmission Line; Bonneville-Vancouver No. 5 and 6 Transmission Line; McNary-Ross No. 1 Transmission Line; Ross-Vancouver Shipyard No. 1 Transmission Line

County	Transmission Facility
Douglas	CPUD Rocky Reach - Columbia No. 2 Transmission Line; PSE Rocky Reach - Cascade Transmission Line; BPA Rocky Reach-Maple Valley Transmission Line
Franklin	Benton-Franklin No. 2 Transmission Line; Pasco-Kennewick Transmission Line Columbia River
Grant	Vantage-Columbia #1 Transmission Line; Midway-Vantage #1 Transmission Line; Transmission Lines to Midway Station - Priest Rapids; Chelan - Stratford 115 kV Transmission Line
King, Pierce, and Thurston	Olympia-Grand Coulee No 1 Transmission Line
King, Thurston, and Lewis	Raver-Paul No 1 Transmission Line
Jefferson	Shelton-Fairmount Transmission Lines No. 1; Shelton-Fairmount Transmission Line No. 2
King	Chehalis-Covington No. 1 230 kV Transmission Line; Covington-Duwamish No. 1 230 kV Transmission Line; Covington-Maple Valley No. 2 230 kV Transmission Line; Covington-White River No. 1 230 kV Transmission Line; Raver-Covington No. 1 500 kV Transmission Line; Raver-Covington No. 2 500 kV Transmission Line; Raver-Echo Lake No. 1 500 kV Transmission Line; Schultz-Raver No. 1 500 kV Transmission Line; Schultz-Raver No. 3 500 kV Transmission Line; Tacoma-Raver 1&2 No. 1 500 kV Transmission Line; Tacoma-Raver 1&2 No. 2 500 kV Transmission Line; Tacoma-Covington Nos. 2–4 230 kV Transmission Line Sammamish-Lakeside-Talbot Hill Transmission Lines Nos. 1 and 2; Transmission Pole Dolphins
Klickitat	McNary-Ross No. 1 345kV Transmission Line; North Bonneville-Midway No. 1 230 kV Transmission Line; Harvalum-Big Eddy No. 1 230 kV Transmission Line; Chenoweth-Goldendale No. 1 155 kV Transmission Line; Big Eddy-Spring Creek BPA Transmission Line
Okanogan	Wells Dam Transmission lines to Douglas Switchyard; Winthrop Tap to Twisp Okanogan Transmission Line
Pacific	Holcomb – Naselle Transmission Line, BPA
Pend Oreille	Boundary-Cranbrook Transmission Line
Pierce	Cowlitz Tap 230 kV Transmission Line; St Clair-South Tacoma No 1 Transmission Line
Skamania	Underwood Tap Transmission Line
Stevens	BPA Bell-Boundary No. 3; Bell-Addy No. 2 Transmission Line
Spokane	Spokane-Trentwood No. 1 Transmission Line; Spokane-Trentwood No. 2 Transmission Line; Bell-Boundary No. 1 Transmission Line; Four Lakes Tap to Sunset - East Colfax No. 1 Transmission Line; Cheney Tap to Silver Lake - Sunset No. 1 Transmission Line
Snohomish	Bothell-Sno-King No. 1 Transmission Line
Walla Walla	Lower Monumental to McNary Transmission Line No. 1

Source: DAHP n.d.(b)

BPA = Bonneville Power Administration; **CPUD** = Clatskanie People's Utility District; **kV** = kilovolt; **PSE** = Puget Sound Energy

Historic Districts

There are at least 122 historic districts that are listed or eligible for listing in the NRHP/Washington Heritage Register (WHR) in Washington (**Table 3.15-9**) (DAHP n.d.[b]). A historic district is defined in 36 CFR 60.3 as "a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development," and can depend on the aspects of setting and feeling to convey or express its historic significance. Therefore, historic districts as a property type can be susceptible to adverse environmental impacts from modern visual intrusions.

Table 3.15-9. Historic Districts in Washington Listed or Eligible for Listing on the National Register of Historic Places/Washington Heritage Register

County	Historic District
Adams	Ritzville Historic District
Benton	Gold Coast Historic District
Bern-Mittelland	Stevens Pass Historic District
Chelan	Buckner Homestead Historic District; Cottage Avenue Historic District; Downtown Wenatchee Historic District; Brown's First Addition Historic District; Leavenworth Ski Hill Historic District
Clallam	Roose, Peter, Homestead; Rosemary Inn; Singer's Lake Crescent Tavern; Port Angeles Civic Historic District
Clark	Washington School For the Blind; Officers Row, Fort Vancouver Barracks; Basalt Cobblestone Quarries District - Ridgefield National Wildlife Refuge; Hough Neighborhood Historic District;[(a)] Vancouver National Historic Reserve Historic District
Columbia	Downtown Dayton Historic District; South Side Historic District – Dayton; Washington Street Historic District - Dayton
Cowlitz	Longview Civic Center Historic District
Douglas	Downtown Waterville Historic District
Garfield	Downtown Pomeroy Historic District
Island	Central Whidbey Island Historic District; Cama Beach Resort
Jefferson	Irondale Historic District; Quilcene Ranger Station; Fort Flagler
King	Green River Gorge Historic District;[(a)] Columbia City Historic District; Pioneer Square--Skid Road Historic District (Including Boundary Increases); Pike Place Public Market Historic District; Harvard-Belmont District; Ballard Avenue Historic District; Mount Baker Park Historic District; Roanoke Park Historic District; Wellington Disaster Site;[(a)] Chittenden Locks and Lake Washington Ship Canal; Town of Bayne;[(a)] Seattle Chinatown Historic District; Covenant Beach Bible Camp; Tenas Chuck Houseboat Moorage Historic District;[(a)] Skykomish Historic Commercial District; Landsburg Headworks Historic District;[(a)] Snoqualmie Falls Hydroelectric Power Plant Historic District; Seattle Municipal Light and Power Plant; Naval Air Station Seattle; White Center Fieldhouse and Caretaker Cottage;

County	Historic District
	Storey, Ellsworth, Cottages Historic District; Selleck Historic District; Camp North Bend; Saint Edward Seminary; Fort Lawton; Montlake Historic District; Covington Electrical Substation, BPA; Ravenna-Cowen North Historic District; Millionaire's Row Historic District
Kitsap	Fort Ward Historic District and Expansion; Hospital Reservation Historic District - Puget Sound Naval Shipyard; Marine Reservation Historic District; Officers' Row Historic District - Puget Sound Naval Shipyard; Puget Sound Radio Station Historic District
Kittitas	Roslyn Historic District; Cabin Creek Historic District; Downtown Ellensburg Historic District; Liberty Historic District; Kittitas County Fairgrounds; Ellensburg First Railroad Addition Historic District; Chicago, Milwaukee, St. Paul, and Pacific Railroad: South Cle Elum Yard; The Mountaineers Snoqualmie Lodge[a]
Klickitat	Homesteads of the Dalles Mountain Ranch Historic District[a]
Lewis	Pennsylvania Avenue--West Side Historic District – Chehalis; Hillside Historic District; Chehalis Downtown Historic District; Centralia Downtown Historic District
Lincoln	Little Falls Hydroelectric Power Plant
Mason	Cushman Hydroelectric Project Historic District
Okanogan	Old Molson;[a] Salmon Meadows Ski Lodge District;[a] Early Winters Ranger Station Work Center; Tungsten Mine Historic District;[a] Tekoa Grain Company Elevator and Flathouse
Pacific	Oysterville Historic District; Cape Disappointment Historic District
Pend	Boundary Hydroelectric Project
Pierce	Salmon Beach Historic District;[a] Old City Hall Historic District – Tacoma; Upper Fairfax Historic District;[a] Stadium-Seminary Historic District; Steilacoom Historic District; Union Depot-Warehouse Historic District – Tacoma; College Park Historic District; Fort Steilacoom; South J Street Historic District – Tacoma; Dupont Village Historic District; Nisqually Entrance Historic District - Mount Rainier Historic District; North Slope Historic District; Fort Lewis Garrison Historic District;[a] McChord Field Historic District; Wedge Historic District; Buckley's Addition Historic District; Camp Six; American Lake Veterans Hospital
San Juan	San Juan Lime Company / Cowell's; Krumdiack Homestead; Tharald Homestead
Sibley	Lake Washington Boulevard
Skagit	La Conner Historic District; Northern State Hospital
Skamania	Condit Hydroelectric Power Plant
Snohomish	Snohomish Historic District; Hartford to Monte Cristo Railroad; Naval Auxiliary Air Station – Arlington; Rucker Hill Historic District; Hewitt Avenue Historic District; Verlot Ranger Station –Public Service Center; Darrington Ranger Station
Spokane	Riverside Avenue Historic District; Spokane River District;[a] Browne's Addition Historic District; Fort George Wright Historic District; Marycliff-Cliff Park Historic District; Corbin Park Historic District; Peaceful Valley Historic District; Mission Avenue Historic District; Nine Mile Hydroelectric Power Plant Historic District; Felts Field Historic District; Washington State Normal School at Cheney Historic District; Ninth Avenue Historic District – Spokane; Rockwood Historic District; Desmet Avenue Warehouse Historic District; West Downtown Historic

County	Historic District
	Transportation Corridor; City of Cheney Historic District; Hillyard Historic Business District; Millwood Historic District; East Downtown Historic District – Spokane; Nettleton's Addition Historic District; Hutton Settlement District; Mount Saint Michael
Stevens	Meyers Falls Power Plant Historic District; Long Lake Hydroelectric Power Plant
Thurston	Washington State Capitol Historic District; Tumwater Historic District; South Capitol Neighborhood Historic District; Tenino Downtown Historic District; Olympia Downtown Historic District
Wahkiakum	Skamokawa Historic District
Walla Walla	Waitsburg Historic District; Walla Walla Downtown Historic District; Fort Walla Walla Historic District
Whatcom	Eldridge Avenue Historic District; Fairhaven Historic District; Broadway Park Historic District; Skagit River and Newhalem Creek Hydroelectric Projects; Sehome Hill Historic District; Cissna Cottages Historic District; South Hill Historic District – Bellingham; York Historic District; Downtown Bellingham Historic District
Whitman	Palouse Main Street Historic District; Colfax Main Street Historic District;[a] College Hill Historic District
Yakima	Old North Yakima Historic District; Yakima Valley Transportation Company

Source: DAHP n.d.(b)

Notes:

[a] Only listed in the Washington Heritage Register

BPA = Bonneville Power Administration

Farmsteads

The rural setting of most farmsteads (**Table 3.15-10**) and the overall lack of modern intrusions make these types of historic properties susceptible to visual adverse environmental impacts. Similar to historic districts, the severity of the impact would depend on whether the aspects of setting and feeling are important to convey or express the historic significance of the farmstead complex.

Table 3.15-10: Historic Farmsteads in Washington Listed or Eligible for Listing in the National Register of Historic Places/Washington Heritage Register

County	Farmstead
Adams	Donnell Farm; Daintys Farm; Harder Farm; Richter Homestead - Hulett Farm – Residence; Taylor and Sons Farm – Barn, Stable, and Windmill; Taylor and Sons Farm – Residence
Chelan	Gensinger, Edward and Okle, Farmstead[a]
Clallam	Emery Farmstead; Gierin Farmstead;[a] Hyer, John A., Farm
Clark	Clark County Poor Farm; Southwestern Washington Experiment Station; Heisen, Henry, Farm; Pomeroy Farm; Meyer, Heye H. and Eva, Farmstead; Kapus Farm (Granary and Barn); Farmhouse; Blair Farmstead; Thomas Farmstead; Morrow,

County	Farmstead
	Daniel & Margaret, Farmstead; Nielsen Farmstead - Machine Shop / Quonset Hut; Lechtenberg Farm
Island	Griffiths, Captain James, Farmstead; John P. and Annie Larson Farm: Hired Man's House; Whidbey Island Game Farm
King and Snohomish	Bates-Tanner Farm and Winningham Farm
King	Hollywood Farm; Allen, Horatio and Laura, Farm; Thomas-Nelson Farm; Merrilegs Farm; Kristian Stensland Farm; Tollgate Farm House; Anderson, Tolle, Farm; Northup Homestead/Dairy and Cherry Farm; Schmieg Farm; Sween's Poultry Farm Brooder House; Aldarra Farms Barn; Pickering Farm; Dougherty, John and Kate, Farmstead; Olson, Mary, Farm; Reard-Freed Farmstead; Hjertoos, Andrew and Bergette, Farm; Adair, William and Estella, Farm
Kitsap	Bucklin Farm[(a)]
Kittitas	Kittitas Division South Branch Canal Farm Bridge at Station No. 416+75; Kinkade, John W., Farmstead; Springfield Farm; Nelson, Albert, Farmstead
Klickitat	McNabb Farmstead and Overlook Farm[(a)]
Lewis	Glen and Edna Reid Farm
Lincoln	Folsom Farm Granary
Okanogan	Warren, Marion and Annie, Farmstead[(a)] and Morris, Jacob and Cynthia, Farmstead[(a)]
Pacific	Ernest Lilly Farm
Pierce	Farmer's Warehouse; Johnson Farm; Smith, Peter, Farm-Donation Land Claim
Skagit	Chris Knutzen Farm / Einer Knutzen Farm / Maple Court Dairy
Skamania	Underwood, Edward and Isabelle, Farm; Five Oaks Farm
Snohomish	Herbert S. Conner Farm – House and Meyer, Adolph, Farm
Spokane	East Farms Water Tank/Spokane Valley Project Water Tank No. 11; Farmers National Warehouse Corporation Grain Elevator; North Pacific Grain Growers Grain Terminal; Trolan, Daniel and Mary Ann, Farmhouse; Palmer, Eben and Cynthia, Farmstead
Stevens	Ham Farmstead[(a)] and Farm House
Thurston	Brown Farm; Harris/Ames Farmstead; Erickson, Jonas and Maria Lovisa, Farmstead
Walla Walla	Gardena Farms North Lateral
Whatcom	Woodstock Farm; Mitchell Farmstead; Loomer Family Farm; Harry Zettle Farm
Whitman	Masonic Hall – Farmington and Heilsberg, Gustav, Farm
Yakima	Roza Division Wasteway No. 3 Farm Bridges No. 1 & 2; Roza Division Wasteway No. 5/Sulphur Creek Wasteway Farm Bridges; Laframboise Farmstead; Cornell Farmstead

Source: DAHP n.d.(b)

Notes:

[(a)] Only listed in Washington Heritage Register

Listed Parks and Historic Districts in Parks

Twenty-three parks in the Study Area that are listed in the NRHP/WHR are likely to have setting and/or feeling as an important aspect of integrity. There are 33 historic districts in the state that are located within local, state, and national parks and are also likely to have landscape features and elements that contribute to the setting and/or feeling of the district (**Table 3.15-11**) (DAHP n.d.[b]).

During the siting and planning period of project-specific applications, the NRHP/WHR nominations for these resources should be consulted to ascertain under what NRHP criteria the districts are significant and what aspects of integrity are important to their significance.

Table 3.15-11: Parks and Historic Districts Within Parks in Washington that are Listed on the National Register of Historic Places/Washington Heritage Register

County	Historic District/Park
Chelan	Golden West Lodge Historic District - North Cascades National Park and High Bridge Ranger Station Historic District - North Cascades National Park
Clallam	Olympus Guard Station - Olympic National Park and Olympic National Park Headquarters Historic District
Clark	Lewisville Park
Cowlitz	Lake Sacajawea Park
Douglas	Douglas Park[(a)]
Franklin	Sacajawea State Park
Jefferson	Old Fort Townsend State Park[(a)]
King	Colman Park & Dose Terrace Stairs; Denny Park;[(a)] Frink Park; Freeway Park; Gas Works Park; Mount Baker Park and Boulevard; Redmond City Park; Si View Park; Volunteer Park - Seattle
Kittitas	Olmstead Place State Park
Grays	Schafer State Park
Mason	Twanoh State Park
Pacific	The Wreckage - Ocean Park
Pierce	Longmire Historic District - Mount Rainier National Park;[(b)] Paradise Historic District - Mount Rainier National Park; Sunrise Historic District - Mount Rainier National Park;[(b)] Wright Park and Seymour Conservatory; White River Entrance - Mount Rainier National Park [(b)]
Skagit	Causland Park
San Juan	Moran State Park
Snohomish	Bothell-Lake Forest Park Highway[(a)]
Spokane	Cowley Park; Coeur d'Alene Park; Manito Park and Boulevard[(a)]
Thurston	Millersylvania State Park and Sylvester Park - Olympia

County	Historic District/Park
Whatcom	Pioneer Park – Ferndale[a] and Park Butte Lookout - Mt. Baker - Snoqualmie National Forest
Whidbey Island	Deception Pass State Park: Rosario and Bowman Bay Bathing, Picnic and Caretaker's Areas Historic District; Cranberry Lake Caretaker's Area Historic District; North Beach Picnic Area Historic District and Cranberry Lake Bathing and Picnic Area Historic District

Source: DAHP n.d.(b)

Notes:

[a] Only listed in the Washington Heritage Register

[b] National Historic Landmark

3.15.2.2 Cultural Resources

Cultural resources are locations of human activity, occupation, or use that are identifiable through field inventory (survey), historical documentation, or oral history. The term includes archaeological sites, TCPs, and Tribal resources with associations with traditional, religious, and cultural importance to specified social and/or cultural groups (WAPA 2015). Tribal interests in cultural resources extend beyond reservation lands to include resources within treaty and trust lands, including U&As, TCPs, and areas of historical and ecological significance. Cultural resources that can be adversely affected by project-specific applications are identified below. These resources should be considered during the planning and siting stages of project-specific applications. DAHP emphasizes the importance of early and meaningful engagement with Tribes during the planning stages of projects that may affect Tribal cultural resources. This process involves seeking, discussing, and considering the views of the Tribes and, where feasible, seeking agreement with them. The SEPA Lead Agency will work directly with Tribal governments to identify and assess potential adverse environmental impacts in these areas, consistent with treaty rights and the principles of Free, Prior, and Informed Consent.[21]

Archaeological Sites

Nearly 25,000 archaeological sites are listed or eligible for listing in the NRHP/WHR in Washington (DAHP n.d.[b]). Archaeological sites are defined as "the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself maintains

[21] The principle that the State must seek the affected Tribes' consent before making any decision or action on a proposed project or action that affects a Tribe. The consent must be given freely, and the affected Tribes should receive complete, accessible, and culturally appropriate information about the project's scope, impacts, and alternatives in order to make an informed decision.

historical or archeological value regardless of the value of any existing structure" (36 CFR 60.3). These sites can be found in all types of places and landscapes in the state and are highly susceptible to direct adverse environmental impacts from transmission facility development due to their fragile nature and, often, lack of aboveground presence.

Traditional Cultural Places

TCPs (alternatively referred to as Traditional Cultural Properties) is a term used by the National Park Service, and adopted by other agencies, to define a property that is listed in, or eligible for inclusion, in the NRHP "for its significance to a living community because of its association with cultural beliefs, customs, or practices that are rooted in the community's history and that are important in maintaining the community's cultural identity" (NPS 2023). TCPs are associated with intangible elements of cultural heritage, including the arts, skills, folklife, and folkways of communities of any cultural or ethnic background. Examples can include locations associated with the traditional beliefs of a Native American Tribe, a location where a community has traditionally carried out cultural practices that are important in maintaining its historical identity, or a neighborhood that is the traditional home of a particular cultural group that reflects its beliefs and practices. In Washington, information about TCPs identified in the state is kept secure by DAHP per RCW 42.56.300(3)(c) (DAHP 2017).

For federal undertakings, TCPs that are determined eligible for listing on the NRHP, and any effects on them, must be considered per the Section 106 process defined in the NHPA. In addition, TCPs are a cultural resource under the National Environmental Policy Act (NEPA).

Tribal Resources

Tribal resources are tied to the inherent and treaty-reserved rights of federally recognized Tribes to access ancestral and traditional areas to continue traditional and cultural activities related to root gathering, fishing, ceremonial practices, and passing on religious teachings or indigenous knowledge. Tribal resources within ancestral areas can include resources traditionally gathered for food, medicine, and other cultural practices; food forests; foraging landscapes; important habitats for migratory populations of game; plant resources; and locations where hunting, gathering, fishing, and other activities occur. Tribal resources are often associated with, but are not limited to, U&As established through treaties with a specific Tribe or court decisions (**Table 3.15-12**). The significant setting, feeling, and association of Tribal resources

make them susceptible to adverse physical and visual environmental impacts, particularly through the loss of vegetation and new construction of access roads as related to transmission facility projects. The identification and evaluation of Tribal resources can require extensive engagement with Tribes and stakeholders and systematic ethnographic research. This extensive engagement should be standard practice in planning for alternative routes.

3.15.2.3 Tribal Treaty Rights, Interests, and Consultation

Indigenous people have been in the Pacific Northwest since time immemorial. These communities continue to have close ties with the land in Washington, as well as close connections to their traditional territories, U&As, ceded lands, and reservations (**Figure 3.15-2**). Though intended to provide background information on Tribal rights and protection of Tribal interests and resources, this section does not exhaustively cover the numerous pieces of state and federal legislation that exist for the protection of Tribal Resources and Treaty Rights.

Treaty Rights

In the mid-19th century, Governor Isaac Stevens, on behalf of the United States, negotiated with various Tribes throughout Washington to cede 64 million acres of land to the United States for non-Indian settlement. These negotiations took place with 29 Tribes under eight treaties (**Table 3.15-12**). Several of these treaties created reservations for signatory Tribes. Lands were ceded to the United States in return for "for promises to protect their rights as self-governing nations within their reserved lands (reservations) and their ability to exercise certain retained rights (i.e., hunting, fishing, and gathering) to resources located outside of those reserved lands" (ACHP n.d., p.16). These inherent and treaty-reserved rights extend throughout the treaty territory of mapped ancestral homelands of each Tribe, and across all U&As, which, together, constitute a large portion of the state.

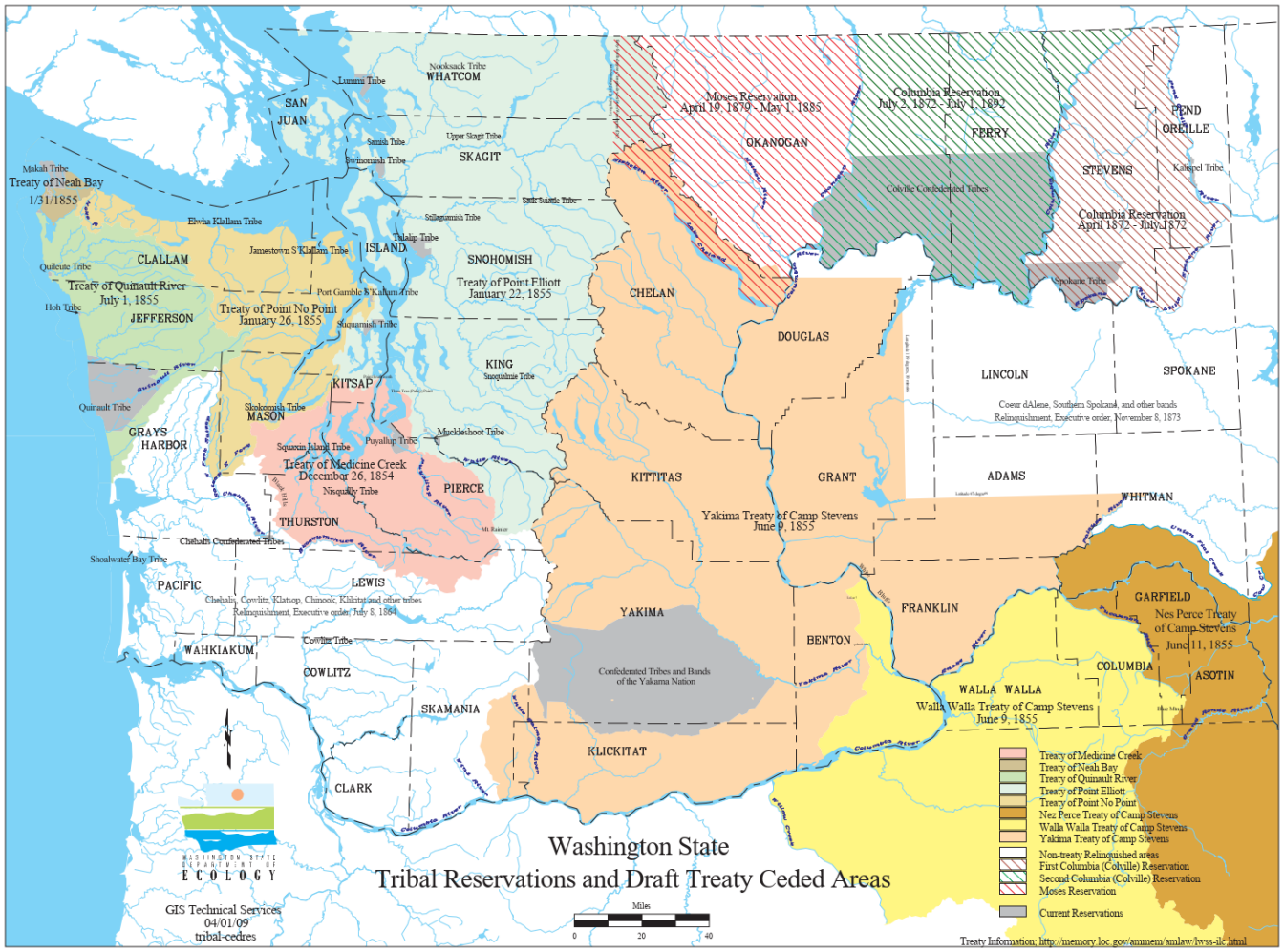

Figure 3.15-2: Washington State Tribal Reservations and Draft Treaty Ceded Areas

Source: Ecology 2009

Table 3.15-12: Treaties Between the United States and Tribes in Washington

Treaty	Indian Tribe	Location and Date
Treaty with the Yakamas	Yakama confederated tribes and bands	Camp Stevens, Walla Walla Valley June 9, 1855
Treaty with the Walla Wallas	Walla Walla, Cayuse, and Umatilla Tribes and bands	Camp Stevens, Walla Walla Valley June 9, 1855
Treaty of Olympia (also known as the Quinault Treaty)	Quinault, Hoh, and Quileute	Qui-nai-elt River January 25, 1856
Treaty of Point No Point	Jamestown S'Klallam, Port Gamble S'Klallam, Lower Elwha, Skokomish	Point No Point, Suquamish Head January 26, 1855

Treaty	Indian Tribe	Location and Date
Treaty of Point Elliott	Lummi, Nooksack, Stillaguamish, Swinomish, Upper Skagit, Suquamish, Sauk-Suiattle, Tulalip, and Muckleshoot	Point Elliott January 22, 1855
Treaty with the Nez Perces	Nez Perce Tribe	Camp Stevens, Walla Walla Valley June 11, 1855
Treaty of Neah Bay	Makah	Neah Bay January 31, 1855
Treaty of Medicine Creek	Nisqually, Puyallup, Squaxin Island, Muckleshoot	Medicine Creek December 26, 1854

Usual and Accustomed Areas

The eight treaties all contain similar language reserving the right to hunt, fish, and conduct other traditional activities on lands outside of the reservations, known as Usual and Accustomed Areas (U&As):

> *"The right of taking fish, at all usual and accustomed grounds and stations, is further secured to said Indians in common with the citizens of the territory…together with the privilege of hunting, gathering roots and berries, and pasturing their horses on open and unclaimed lands."* (WDFW 2025)

While settler encroachment has led to the destruction of and reduced access to these U&As, Tribes maintain their treaty-reserved rights to continue traditional activities, including the right of taking fish within these U&As (**Figure 3.15-3**). Since the establishment of Washington State, indigenous communities have fought to secure access to their Tribal resources as established by the treaties. In 1942, the case of *Tulee v. Washington* resulted in a ruling that the State of Washington could not charge Native Americans a fee to fish at U&As (Dougherty 2020). *United States v. State of Washington* concluded in February 1974 that Tribes had a right to 50 percent of the fish that are harvested in their recognized fishing grounds (Dougherty 2020). As part of the ruling, Tribes were made co-managers of the state's fisheries (Dougherty 2020). As of 1996, the President's Executive Order 13007 requires that federal agencies accommodate access to and use of Indigenous sacred sites, avoid physical adverse environmental impacts on sacred sites, and maintain the confidentiality of these sites. In 2003, House Bill 1057 was passed, and RCW 77.15.570 was established to help protect Tribal fisheries' resources.

In 2007, the Washington Attorney General's Office provided a summary of adjudicated U&As in Washington (**Table 3.15-13**) (WSDOT 2007). This list is by no means comprehensive, as Tribes may have a legitimate off-reservation U&A claim that has not been formally adjudicated. U&As located in coastal waters are not within the Study Area for this Programmatic EIS and are indicated in italic font in **Table 3.15-13**.

Table 3.15-13: Summary of Adjudicated Off-Reservation Tribal Usual and Accustomed Fishing Areas as of August 24, 2007

Tribe	Usual and Accustomed Fishing Areas
Chehalis	None
Chinook	None
Cowlitz	None
Duwamish	Modern-day Duwamish do not hold fishing rights reserved to the Duwamish Tribe that signed the treaty.
Hoh	▪ Hoh River system (mouth to uppermost reaches and tributaries) ▪ Quillayute River system and tributaries ▪ Dickey River system ▪ Bogachiel River system ▪ Calawah River system ▪ Soleduck River system ▪ Queets River system ▪ Quinault River system ▪ Lake Dickey ▪ Pleasant Lake ▪ Lake Ozette ▪ *Adjacent tidewaters and saltwater areas*
Jamestown S'Klallam Lower Elwha Port Gamble S'Klallam	▪ *Strait of Juan de Fuca waters* ▪ All streams draining into the Strait of Juan de Fuca from Hoko River east to the mouth of Hood Canal ▪ *Waters of San Juan Islands archipelago* ▪ *Waters off the west coast of Whidbey Island* ▪ All streams draining into Hood Canal except the Skokomish River and its tributaries and the Sekiu River by regulation of the Makah Tribe
Lummi	▪ *Marine areas of Northern Puget Sound from the Fraser River south to Edmonds* ▪ *Bellingham Bay* ▪ River drainage systems, especially Nooksack, emptying into the bays from Boundary Bay south to Fidalgo Bay ▪ *Admiralty Inlet* ▪ No U&As in mouth of Hood Canal or Strait of Juan de Fuca

Tribe	Usual and Accustomed Fishing Areas
Makah	▪ *Marine waters of Strait of Juan de Fuca east to Port Crescent* ▪ Rivers/streams along Strait of Juan de Fuca from the Hoko River east to the Lyre River, including the Pysht River and Twin River ▪ *Pacific Ocean waters*
Muckleshoot	▪ Upper Puyallup River and tributaries ▪ Carbon River and tributaries ▪ Stuck River and tributaries ▪ White River and tributaries ▪ Green River and tributaries ▪ Cedar River and tributaries ▪ Black River and tributaries ▪ Soos Creek ▪ Burns Creek ▪ Newaukum Creek ▪ Lake Washington ▪ *Elliott Bay*
Nisqually	▪ *Saltwater areas of the mouth of the Nisqually River and surrounding bay* ▪ Nisqually River and tributaries ▪ McAllister (also known as Medicine or Shenahnam) Creek ▪ Sequalticu Creek ▪ Chambers Creek ▪ Lakes between Steilacoom and McAllister Creeks ▪ *All saltwater areas of southern Puget Sound from the northernmost tip of the area generally known as Henderson Bay south to the Nisqually River bay area to a line drawn from Johnson Point to Devils Head; from a line drawn east from Point Fosdick on Kitsap Peninsula to Day's Island south to the Nisqually River bay area (to a line drawn from Johnson Point to Devils Head); and all waters between Henderson Bay and the Narrows (to a line drawn from Point Fosdick to Day's Island) including Carr Inlet and Hale Passage; as well as the freshwater rivers and streams which drain into that area*
Nooksack	▪ Nooksack River and tributaries ▪ *Bellingham Bay* ▪ *Chuckanut Bay* ▪ *Birch Bay* ▪ *Semiahmoo Bay* ▪ *Semiahmoo Spit and surrounding marine waters*
Puyallup	▪ *Salt waters north and west of a line drawn from Mahnckes Point on the Kitsap peninsula to the westernmost point of McNeil Island bordering on Pitt Passage, then extending from Hyde Point on McNeil Island to Gibson Point on Fox Island, then extending from Fox Point on Fox Island to Point Fosdick on the Kitsap peninsula,*

Tribe	Usual and Accustomed Fishing Areas
	generally known as the Carr Inlet/Henderson Bay/Hale Passage area, as well as the freshwater rivers and streams that drain into that area ▪ *Salt waters north and east of a line drawn from Hyde Point on McNeil Island to Gordon Point on the mainland and south of the marine areas generally known as the Narrows area* ▪ Puyallup River and tributary rivers and creeks ▪ Smaller creeks adjacent to but not tributaries of the Puyallup River
Quileute	▪ Hoh River from mouth to uppermost reaches and tributary creeks ▪ Quileute River and its tributaries ▪ Dickey River ▪ Soleduck River ▪ Bogachiel River ▪ Calaway River ▪ Lake Dickey ▪ Pleasant Lake ▪ Lake Ozette ▪ *Adjacent tidewaters and saltwater*
Quinault	▪ Clearwater River ▪ Queets River ▪ Salmon River ▪ Quinault (including Lake Quinault and Upper Quinault) ▪ Raft River tributaries ▪ Moclips River ▪ Copalis River ▪ Joe Creek ▪ *Adjacent ocean fisheries* ▪ Shared U&As - Grays Harbor and streams emptying into Grays Harbor
Samish	U&As being determined in ongoing litigation
Sauk-Suiattle	▪ Sauk River and Bedal Creek (tributary) ▪ Cascade River ▪ Suiattle River and tributaries ▪ Big Creek ▪ Tenas Creek ▪ Buck Creek ▪ Lime Creek ▪ Sulphur Creek ▪ Downey Creek ▪ Straight Creek ▪ Milk Creek
Shoalwater Bay	None

Tribe	Usual and Accustomed Fishing Areas
Skokomish	▪ All waterways draining into Hood Canal ▪ Hood Canal
Snohomish	None
Snoqualmie	None
Snoqualmoo	None
Squaxin	▪ Shallow bays, estuaries, inlets and open waters of Southern Puget Sound ▪ Freshwater streams and creeks draining into those waters ▪ *Saltwater north and west of line drawn from Mahnckes Point (Kitsap Peninsula) to the westernmost point of McNeil Island, bordering Pitt Passage, then extending from Hyde Point on McNeil Island to Gibson Point on Fox Island, and then extending from Fox Point on Fox Island to Point Fosdick on the Kitsap Peninsula, generally known as the Carr Inlet/Henderson Bay/Hale*
Steilacoom	None
Stillaguamish	▪ Area embracing the Stillaquamish River and north and south forks
Suquamish	▪ *Marine waters of Puget Sound from the northern tip of Vashon Island to the Fraser River including Haro and Rosario Straits* ▪ Streams draining into the west side of this portion of Puget Sound and also Hood Canal ▪ No U&A on the east side of Puget Sound
Swinomish	▪ Skagit River and tributaries ▪ Samish River and tributaries ▪ *Marine areas of northern Puget Sound from the Fraser River south to and including Whidbey, Camano, Fidalgo, Guemes, Samish, Cypress and the San Juan Islands* ▪ *Bellingham Bay* ▪ *Hale Passage adjacent to Lummi Island* ▪ No U&A in Salmon catch Management Area 10
Tulalip	▪ *Admiralty Inlet, including its Whidbey Island bays* ▪ *Saratoga Passage* ▪ *Penn Cove* ▪ *Holmes Harbor* ▪ *Possession Sound and Puget Sound south of Whidbey Island to the present West Point Lighthouse, including Tulalip Bay and Port Gardiner* ▪ *Stu-bus and Ile'ï-s-tu-bus* ▪ *Port Susan inlet, except close to the mouths of the Stillaguamish River* ▪ *Waters off the west coast of Whidbey Island, including those northerly and westerly from the West Beach shoreline from Deception Pass to Point Partridge*

Tribe	Usual and Accustomed Fishing Areas
	▪ *Point Roberts, Birch Bay, and adjacent waters now designated WDF Area 7A* ▪ *The waters of the San Juan Archipelago, Haro Strait and Rosario Strait, and the portion of the Strait of Juan de Fuca northeasterly of a line drawn from Trial Island (in Canada) to Protection Island* ▪ *The waters of WDF Area 10* ▪ Snohomish-Snoqualamie-Skykomish River drainage area, including its freshwater lakes ▪ Stillaguamish River (only with the permission and at the invitation of the Stillaguamish Tribe)
Upper Skagit	▪ Numerous areas along the Skagit River extending from about Mt. Vernon upstream to Gorge Dam ▪ *Saratoga Passage on the east coast of Whidbey Island, from Sneatlum Point in the vicinity of Penn Cove and Herrington's Lagoon to Holmes Harbor and on Camano Island from Utsaladdy to the vicinity of Camano Island State Park and Eiger Bay.* ▪ *Deception Pass* ▪ *Similk Bay and southward to and including Penn Cove and Utsaladdy* ▪ *Vicinity of Bayview on Padilla Bay to the vicinity of Blanchard on Samih Bay up to and including Chuckanut Bay*
Yakima	▪ Snohomish River and tributaries ▪ Green River and tributaries ▪ Puyallup River and tributaries ▪ Nisqually River and tributaries ▪ Stuck River and tributaries ▪ Duwamish River and tributaries ▪ White River and tributaries ▪ Carbon River and tributaries ▪ Black Rivers and tributaries ▪ No saltwater U&As

U&A = Usual and Accustomed Area; **WDF** = Washington Department of Fisheries

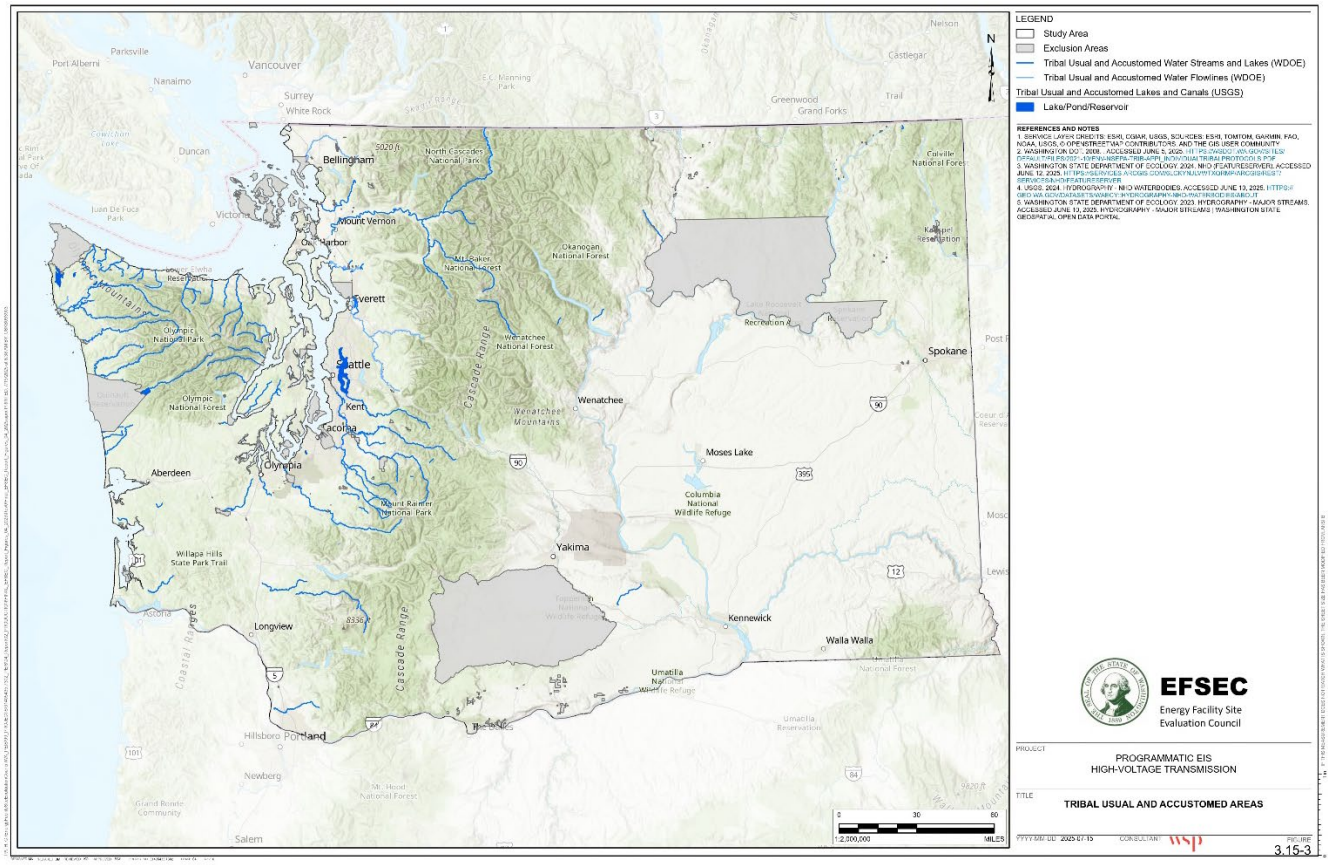

Figure 3.15-3: Adjudicated Off-Reservation Tribal Usual and Accustomed Fishing Areas in Washington

Tribal Interests

As part of the mid-19th-century treaties listed in **Table 3.15-12**, Tribes were relocated from their homelands to reservations outside of their traditional territories. In many cases, several Tribes were grouped together onto reservations, regardless of their previous ties to the land or historical relationships with the people they would be sharing the land with. Consequently, there are areas outside the reservations and treaty areas where Tribes may have an interest in consulting on adverse environmental impacts on cultural resources. DAHP maintains a geographic information system (GIS) map showing Tribal areas of interest that were provided by each tribal organization for the purposes of consulting with the state agency (DAHP n.d.[c]). The map has links to Tribal contact information for consultation with each federally recognized Tribe. If a project is within these Tribal areas of interest, applicants should engage in consultation during the route planning process.

Tribal Consultation

As part of RCW 43.21C.405, EFSEC must offer early and meaningful consultation with any potentially affected Indian Tribe for the purpose of understanding adverse environmental impacts on Tribal rights and resources, including Tribal cultural resources, archaeological sites, sacred sites, fisheries, or other rights and interests in Tribal lands and lands within which an Indian Tribe or Tribes possess rights reserved or protected by federal treaty, statute, or executive order. Tribal consultation is essential to identify and protect archaeological sites, TCPs, Tribal resources, and culturally significant landscapes that may not be visible in desktop reviews or general environmental assessments. Tribes often hold Traditional Ecological Knowledge (TEK) that is critical to understanding the full environmental and cultural impact of a project. The NPS defines TEK as:

> *the on-going accumulation of knowledge, practice and belief about relationships between living beings in a specific ecosystem that is acquired by indigenous people over hundreds or thousands of years through direct contact with the environment, handed down through generations, and used for life-sustaining ways.*

The goal of consultation is early identification of Tribal rights, interests, cultural resources, or other Tribal resources during the route planning process, alternatives analysis, and assessment of effects by the project type. Consultation can also help identify solutions, when possible, to avoid, minimize, or mitigate any adverse effects on Tribal rights, interests, cultural resources, or other Tribal resources, during environmental review. Early coordination with Tribes should be standard practice in the route planning process for project-specific applications. This consultation is independent of, and in addition to, any public participation process required by state law or by a state agency.

EFSEC and partner agencies will uphold their government-to-government consultation responsibilities by providing early notice, sufficient time for review, and culturally appropriate engagement methods. This consultation will be consistent with protocols specific to each Tribe and will be conducted in accordance with applicable laws. Tribal consultation will be conducted independently of the public comment process to ensure that Tribal rights, interests, and knowledge are fully considered. EFSEC and partner agencies will also explore opportunities to facilitate resources or technical assistance to support Tribal capacity for meaningful participation in project-specific environmental reviews.

Best Practices for Tribal Engagement

For large projects or the new construction of transmission facilities that will involve multiple counties, it is recommended that most, if not all, of the best practices for Tribal consultation outlined above are implemented prior to the best practices described below.

Submit EFSEC Pre-Application Information to Interested Tribes for Review/Input: Information from EFSEC Preapplication Review (Washington Administrative Code [WAC] 463-61-050) relevant to Tribal interests should be provided to Interested Tribes to solicit input on potential adverse environmental impacts on TCPs and cultural and Tribal resources. The information from the pre-application could include the following relevant information:

(1) A description of the proposed transmission route and corridor, including location maps and plot plans to scale, showing all major components, including a description of zoning and site availability for any permanent facility, and including whether and to what extent the proposed project is located within a national interest electric transmission corridor;
(2) A description of the proposed ROW width for the transmission facility, including the extent to which a new ROW will be required or an existing ROW will be widened;
(3) A description of the proposed transmission line structures and their dimensions; and
(4) A description of the schedule desired for the project, including the expected application filing date, the expected beginning date for construction, and the expected project operational date.

The above best practices do not replace required Tribal consultation under Section 106 and NEPA; however, successful implementation of these best practices will greatly facilitate and streamline the Section 106 process.

3.15.2.4 Paleontological Resources

Paleontological resources are fossilized remains, traces, or imprints of prehistoric plants and animals preserved in geologic contexts. These resources provide critical scientific information about the Earth's history, ancient ecosystems, and evolutionary processes. In Washington, paleontological resources may be found in sedimentary rock formations, riverbanks, coastal bluffs, and other geological settings throughout the region.

Resource Types and Distribution

The following paleontological resources are found in Washington:

- **Vertebrate fossils:** Bones, teeth, and other remains of prehistoric mammals, reptiles, birds, and fish.
- **Invertebrate fossils:** Shells, exoskeletons, and traces of ancient mollusks, arthropods, and other invertebrates.
- **Plant fossils:** Impressions, petrified wood, and pollen from prehistoric flora.
- **Trace fossils:** Tracks, burrows, and other evidence of ancient life activity.

Significant paleontological sites are documented in various areas, including the Miocene fossil beds of the Columbia Plateau, marine fossils in coastal regions, and Pleistocene deposits in river valleys. These resources may be exposed at the surface or buried within sedimentary layers, and their distribution is closely tied to the geologic history of the area (Snavely et al. 1973).

Paleontological resources on federal lands are protected under the Paleontological Resources Preservation Act (16 USC 470aaa), which prohibits unauthorized collection, excavation, or disturbance of significant fossils. State and local regulations may also apply, particularly for land managed by public agencies or where paleontological resources are considered of scientific or educational value. Paleontological resources located on state lands in Washington are considered property of the state and may only be removed with a valid permit, as outlined in RCW 79.11.210.

Sensitivity and Potential for Occurrence

The sensitivity of an area for paleontological resources depends on the underlying geology and history of fossil discoveries. Areas mapped as sedimentary formations, especially those known for fossil-bearing strata, are considered to have medium to high potential for paleontological resources. Predictive models and geologic maps can be used to identify locations where fossils are most likely to occur.

Paleontological resources are nonrenewable and can be easily damaged or destroyed by ground-disturbing activities such as excavation, grading, or construction. Once removed from their geologic context, the scientific value of fossils may be diminished. Protection of these resources is important for maintaining the integrity of the paleontological record and supporting ongoing research and education.

3.15.3 Impacts

For this Programmatic EIS, adverse environmental impacts were assessed for the new construction, operation and maintenance, upgrade, and modification of transmission facilities within the Study Area.

3.15.3.1 Method of Analysis

The study area for a project-specific application would typically encompass several key regions and features, such as the following:

- **Project Site and Immediate Vicinity:** This includes the specific location of the project and the surrounding area that might be directly affected by new construction, operation and maintenance, upgrade, and modification activities.
- **Viewshed:** This includes the viewshed of the project site that might be affected by new construction, operation and maintenance, upgrade, and modification activities.

This Programmatic EIS analyzes the affected environment and adverse environmental impacts on historic and cultural resources within the Study Area defined in Chapter 1, Introduction. Four project stages for each transmission facility type (overhead or underground) were considered: new construction, operation and maintenance, upgrade, and modification.

This evaluation considers both overhead and underground transmission facilities for each stage. Overhead transmission facilities consist of transmission lines, substations, and ancillary infrastructure. Overhead and underground transmission facilities may involve similar aboveground infrastructure. Underground transmission facilities consist of underground transmission lines, underground access vaults, and other infrastructure located below the ground surface. The new construction of underground transmission facilities could include both open-trench and trenchless construction methods.

Impact Determination

The discussion of adverse environmental impacts is qualitative, given the high-level nature of a Programmatic EIS; quantification would require project-specific details to analyze. **Table 3.15-14** describes the criteria used to evaluate adverse environmental impacts from the Action Alternative and No Action Alternative. Information reviewed to identify adverse environmental impacts on historic and cultural resources in the

Study Area was obtained from federal agencies, state agencies, Tribes, local planning documents, and public scoping.

Table 3.15-14: Criteria for Assessing the Impact Determination on Historic and Cultural Resources

Impact Determination	Description
Nil	No foreseeable adverse environmental impacts are expected. A project would not adversely affect historic or cultural resources. No historic or cultural resources determined eligible for listing in the NRHP or WHR are located within the project footprint; therefore, no known historic or cultural resources would be impacted.
Negligible	A project would result in minimal adverse environmental impacts on historic and cultural resources. Changes would either be non-detectable or, if detected, would have only slight effects. A project would have slight alterations to the characteristics of a historic or cultural resource that qualify it for NRHP or WHR eligibility. The project would cause only minor and temporary physical, visual, or atmospheric impacts. There would be no noticeable changes to the character of the property's use or of physical features within the property's setting that contribute to its historic significance or introduce visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features. Negligible impacts would be short-term in duration. BMPs and design considerations are expected to be effective.
Low	A project would result in noticeable adverse environmental impacts on historic and cultural resources, even with the implementation of BMPs and design considerations. These adverse environmental impacts may include some ground disturbance, vegetation removal, physical destruction, modern intrusions, or damage to all or part of a property, but they would be limited and controlled. There would be minor changes to historic and cultural resources, but these would not result in alterations to the characteristics of a property that qualify it for historic significance or in a manner that would diminish the historic integrity of the property. Adverse impacts on historic and cultural resources would be localized. Adverse environmental impacts may be short or long-term in duration.
Medium	A project would result in adverse environmental impacts on historic and cultural resources, even with the implementation of BMPs and design considerations. A project would result in ground disturbance, vegetation removal, physical destruction, modern intrusions, or damage to all or part of a property. There may be ground disturbance that would directly affect archaeological resources, changes to the character of the property's use or of physical features within the property's setting that contribute to its historic significance, or introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features. Medium impacts may be short or long-term in duration.
High	A project would result in adverse and potentially severe environmental impacts on historic and cultural resources, even with the implementation of BMPs and design considerations. A project would cause extensive ground disturbance, vegetation removal, physical destruction, modern intrusions, or damage to all or part of a property, and these impacts would be unavoidable. There would be physical or visual, adverse environmental impacts on NHLs, Tribal Resources, or

Impact Determination	Description
	TCPs that result in changes to the character of the property's use or of physical features within the property's setting that contribute to its historic significance, or the introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features. Adverse environmental impacts on historic and cultural resources may affect a larger area, not just localized to the construction site. High impacts may be short or long-term.

BMP = best management practice; **NHL** = National Historic Landmarks; **NRHP** = National Register of Historic Places; **TCP** = Traditional Cultural Place; **WHR** = Washington Heritage Register

To clearly understand the potential severity of adverse environmental impacts without any interventions, the following impact determinations exclude the use of Avoidance Criteria and Mitigation Measures. The ratings assume compliance with all federal, state, and local laws and regulations, as well as standardized BMPs and design considerations. Assessing adverse environmental impacts without Avoidance Criteria or Mitigation Measures offers a baseline understanding of potential environmental effects, helping to identify the true extent of these impacts. Environmental laws often require that initial impact assessments be conducted without considering mitigation to maintain the integrity of the environmental review process.

When impact determinations are identified as medium or high, then either the applicant would adopt applicable Mitigation Measures from this Programmatic EIS, or the SEPA Lead Agency may require other applicable mitigation measures to be implemented to reduce project-specific adverse environmental impacts. When impact determinations are low, applicable Mitigation Measures should still be considered by the applicant and the SEPA Lead Agency, as these measures would help to further reduce adverse environmental impacts, including the project's contribution to cumulative impacts. These measures would be implemented in addition to compliance with laws, regulations, environmental permits, plans, and design considerations required for transmission facilities.

For the Section 106 process, the types of effects that may result from adverse environmental impacts on historic and cultural resources are categorized as direct (i.e., physical destruction of, or damage to, all or part of a historic property; alteration of a historic property in a way that is not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and applicable guidelines; or the removal of the property from its historic location) and indirect (change the character of the property's use or of physical features within the property's setting that

contribute to its historic significance, or introduce visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features).

For this Programmatic EIS analysis, adverse environmental impacts are defined as either physical or visual, which are the most common as they relate to transmission facilities. While there may be other types of temporary adverse environmental impacts during new construction on historic and cultural resources, these are localized and not suitable to analyze at the programmatic level. Additionally, other types of adverse environmental impacts related to cultural and historic resources may include noise and vibration (refer to Section 3.13, Noise and Vibration) as well as atmospheric impacts (see Section 3.13, Air Quality).

The analysis of adverse environmental impacts and characterization of significant adverse environmental impacts are organized under new construction, operation and maintenance, upgrade, and modification by impact category as follows:

- **Physical Impacts.** Physical adverse environmental impacts on historic and cultural resources during any stage (i.e., new construction, operation and maintenance, upgrade, or modification) may include ground disturbance, loss of vegetation, replacement of gates and fencing, or modern intrusion. Resource types impacted may include NHLs, historic districts or landscapes, historic trails and scenic byways, farmsteads, parks and historic districts in parks, archaeological sites, Tribal resources, and TCPs.
- **Visual Impacts.** Visual adverse environmental impacts on historic and cultural resources during any stage may include modern intrusion and loss of vegetation. Resource types impacted may include NHLs, historic districts or landscapes, historic trails and scenic byways, farmsteads, parks and historic districts in parks, archaeological sites, Tribal resources, and TCPs.

The analysis of historic resources used in this Programmatic EIS attempts to identify and characterize the broad categories of historic properties that could be adversely impacted by the development of transmission facilities and the nature and scale of adverse environmental impacts associated with these projects. An overview of the types of historic resources that could be encountered in the development of transmission facilities can be found above.

For historic resources, the factors for determining the nature and scale of adverse environmental impacts for this Programmatic EIS include the type of historic resource, the aspects of integrity significant to these resource types, and the distance

from the resource to the transmission facility. Given that the Study Area includes the entire State of Washington, it was not feasible to conduct an analysis of every historic resource type. Instead, the analysis focuses on NHLs and property types that are more likely to be adversely impacted by the development of transmission facilities: historic districts, farmsteads, and landscapes.

For cultural resources, the factors for determining the nature and scale of adverse environmental impacts for this Programmatic EIS include the cultural resource type, the ability to mitigate adverse effects, and the distance of the known resource from the proposed transmission facilities. There are approximately 39,992 currently known cultural resources in the Study Area (DAHP n.d.[b]). This does not account for cultural resources that may be currently identified but in the process of being recorded, or cultural/Tribal resources that are important to Tribes but are not yet known. An analysis of every recorded resource in the state was not feasible as part of this Programmatic EIS; therefore, analysis should be conducted as part of project-specific environmental reviews in consultation with the affected Tribes.

Statewide information in the DAHP Washington Information System for Architectural and Archaeological Records Data (WISAARD) database regarding the specific criteria for NRHP-eligible and listed properties was not available for analysis in this Programmatic EIS, which limited the understanding of the scale of adverse environmental impacts that transmission facilities may have on historic properties. Furthermore, the lack of a specific Study Area makes it difficult to ascertain the level of impact that potential transmission facility projects may have on cultural resources. As applicants consider specific projects, more detailed information for previously surveyed properties can be obtained in WISAARD to inform planning and siting efforts. The Tribal areas of interest available on WISAARD are delineated by each Tribe to convey areas of interest for project consultation. Applicants are required to complete historic and cultural resource surveys to identify and evaluate historic properties and cultural resources that have not yet been identified to comply with Section 106 of the NHPA and SEPA.

The WISAARD predictive model indicates areas that have low to very high risk of encountering archaeological resources and whether an archaeological survey is recommended based on the level of risk (ArcGIS n.d.). In areas flagged by the WISAARD predictive model as high risk, archaeological surveys are strongly advised prior to any ground-disturbing activities. Applicants should consult with DAHP and affected tribes early in the planning process to determine the appropriate level of cultural resource investigation. Predictive modeling should be used in conjunction with Tribal

knowledge, oral histories, and traditional place names to identify areas of potential cultural sensitivity.

Paleontological resources, while distinct from cultural and archaeological resources, are considered within the broader context of historic resources for the purposes of impact determination under this Programmatic EIS. These non-renewable scientific resources are integral to understanding the natural history of the region and may hold cultural significance for Tribes and educational value for the public. As such, paleontological resources are evaluated alongside archaeological and historic properties during project-specific environmental reviews.

3.15.3.2 Action Alternative

New Construction

Overhead Transmission Facilities

Activities for the new construction of overhead transmission facilities would vary and depend on the scale of the facility and site characteristics. New construction could include a relatively short site preparation period (e.g., a few months), followed by a longer construction and start-up period. It is assumed that the new construction of overhead transmission, per mile, would have a shorter duration than underground construction.

Overhead transmission facilities could have the following adverse environmental impacts on historic and cultural resources during new construction:

- Physical Impacts
- Visual Impacts
- Physical Impacts on Tribal Resources and TCPs
- Visual Impacts on Tribal Resources and TCPs

Physical Impacts

New construction of towers, substations, access roads, staging areas, and tensioning and pulling areas has the potential to physically impact historic and cultural resources through the damage or destruction of resources or elements that contribute to historic properties, including historic districts, NHLs, farmsteads, landscapes, historic trails and byways, archaeological sites, and Tribal resources (**Table 3.15-15**). Loss of vegetation and new construction of transmission facility structures within NRHP/NHL boundaries, U&As, and other Tribal areas of interest can physically impact these

resources if these actions directly impact features or resources that contribute to the historic property's significance. Loss of vegetation and new construction of transmission facility structures may impact landscaping or landscape design that might contribute to the historic property. Additionally, transmission facility components that are located outside of a known precontact site boundary, but may destabilize the landscape (e.g., installation of transmission lines within a talus slope), could lead to destabilized conditions for a known archaeological site, thereby resulting in physical impacts.

Table 3.15-15: Physical Impacts on Historic and Cultural Properties During New Construction (Overhead Transmission Facilities)

Component	Type of Physical Impact	Resource Type Impacted	Comments
New ROW	Loss of vegetation	NHLs	Loss of vegetation within NRHP/NHL boundaries could result in a negligible to high adverse environmental impact, depending on the location and extent of vegetation removal and whether that vegetation contributes to setting of the historic property. If the vegetation does not contribute to the setting, the impact would be negligible.
		Historic districts	
		Historic trails/scenic byways[(a)]	
		Farmsteads	
		Parks and historic districts in parks	
		Archaeological sites	Loss of vegetation could result in a negligible to high adverse environmental impact if ground-disturbing impacts from removing vegetation intersect with archaeological sites. Loss of vegetation could result in a high impact on archaeological sites if the disturbance impacts physical features that contribute to its significance.
Transmission towers	Modern intrusion	Historic districts	Introduction of a modern structure into the boundary of NRHP/NHL property could result in a negligible to high adverse environmental impact on these resources if setting is a significant aspect of integrity for the historic property. The magnitude of the impact would depend on whether the intrusion would alter the characteristics of the historic or cultural resource that qualify it for NRHP or WHR eligibility.
		NHL	
		Historic trails/scenic byways[(a)]	
		Farmsteads	
		Parks and historic districts in parks	

Component	Type of Physical Impact	Resource Type Impacted	Comments
▪ Transmission towers ▪ Substations ▪ Access roads and fencing ▪ Staging areas ▪ Pulling and tensioning areas	Ground disturbance	Archaeological sites	Ground disturbance associated with the new construction of transmission towers, substations, access roads, and fencing and creation of staging areas and pulling and tensioning areas within the boundaries of a known archaeological site could result in medium to high adverse environmental impacts. Staging of equipment could lead to compaction of sediments, which could physically impact subsurface archaeological sites, resulting in medium to high impacts.
Access roads and fencing	Replacement of gates/fences	Historic districts/landscapes Farmsteads	Loss or replacement of contributing gates/fences within historic districts/ landscapes and farmsteads could impact the integrity of the resource, resulting in negligible to high adverse environmental impacts depending on whether the gates/fences contribute to the significance of the historic property.

Notes:

[a] Historic trails/scenic byways are defined and analyzed in Section 3.12, Visual Quality.

NHL = National Historic Landmark; **NRHP** = National Register of Historic places; **ROW** = right-of-way; **WHR** = Washington Heritage Register

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from physical impacts during the new construction of overhead transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from negligible to high.

Visual Impacts

New construction of transmission towers, substations, access roads, and clearing of vegetation for a new ROW can have visual adverse environmental impacts on the same types of resources that can be physically impacted (**Table 3.15-16**). The introduction of these components can be a modern intrusion within the setting of these resources. The environmental impacts become adverse when the setting of these historic properties is an important aspect of their integrity. Visual adverse environmental impacts on historic and precontact archaeological sites may include installation of new

transmission facilities within the viewshed of a historic/precontact site, and any new installations that are located within the viewshed of a historic/precontact site.

Table 3.15-16: Visual Impacts on Historic and Cultural Properties During New Construction (Overhead Transmission Facilities)

Component	Type of Visual Impact	Resource Type Impacted	Comments
New ROW	Loss of vegetation	Historic districts	Change in setting from loss of vegetation could result in a negligible to high adverse environmental impact on the resource, depending on the location and extent of vegetation removal and whether vegetation contributes to the setting of the historic property. If the vegetation does not contribute to the setting, the impact would be negligible.
		NHLs	
		Historic trails/scenic byways[a]	
		Farmsteads	
		Parks and historic districts in parks	
		Archaeological sites	New ROW within the viewshed of an NRHP-eligible or listed archaeological site could result in negligible to high adverse environmental impacts. Specifically, a new ROW could remove vegetation that specifically impacts the setting of the archaeological site. The magnitude of the impact would depend on how important the setting is to the archaeological site.
Transmission towers Substations	Modern intrusion	Historic districts	Introduction of modern structures into the viewshed of these historic resources could have a negligible to high adverse environmental impact on them if setting is a significant aspect of integrity for the historic property. The magnitude of the impact would depend on whether the intrusion would alter the characteristics of the historic or cultural resource that qualify it for NRHP or WHR eligibility.
		NHLs	
		Historic trails/scenic byways[a]	
		Farmsteads	
		Parks and historic districts in parks	
		Archaeological sites	Introduction of modern structures into the viewshed of

Component	Type of Visual Impact	Resource Type Impacted	Comments
			NRHP-eligible archaeological sites could result in negligible to high adverse environmental impacts, depending on whether the setting is a significant aspect of integrity for the archaeological site. The magnitude of the impact would depend on whether the intrusion would alter the characteristics of the historic or cultural resource that qualify it for NRHP or WHR eligibility.
Access roads and fencing	Modern intrusion	Districts, parks, and historic districts in parks	Introduction of modern gates and fencing could have negligible to high adverse environmental impacts on the historic resource, depending on whether the gates or fences contribute to the significance of the historic property.
		Farmsteads	

Notes:

[a] Historic trails/scenic byways are defined and analyzed in Section 3.12, Visual Quality.

NHL = National Historic Landmark; **NRHP** = National Register of Historic places; **ROW** = right-of-way; **WHR** = Washington Heritage Register

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from visual impacts during the new construction of overhead transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from negligible to high.

Physical Impacts on Tribal Resources and TCPs

New construction of overhead transmission towers, substations, and access roads, and the creation of staging areas and tensioning and pulling areas, have the potential to physically impact Tribal resources and TCPs through the damage or destruction of resources or elements that contribute to Tribal resources and TCPs (**Table 3.15-17**).

TCPs are associated with traditional beliefs of Native American Tribes; a TCP may be a location where a community has traditionally carried out cultural practices that are important in maintaining its historical identity, or a neighborhood that is the traditional home of a particular cultural group that reflects its beliefs and practices.

Because of the intangible nature of TCPs, these resources are particularly susceptible to physical adverse environmental impacts due to loss of vegetation and new construction of overhead transmission facilities. TCPs may or may not be identified by DAHP and may only be known by the Tribe associated with them. Consequently, early engagement with Tribes is critical to identifying these resources.

Similarly, Tribal resources, which are often located within U&As and Tribal areas of interest, are susceptible to physical and visual adverse environmental impacts, particularly through the loss of vegetation, loss of Treaty-reserved access rights to tribal resources, and new construction of access roads as related to transmission facility development. While U&As are somewhat well defined, the identification and evaluation of Tribal resources outside of U&As can require extensive engagement with Tribes and systematic ethnographic research.

Table 3.15-17: Physical Impacts on Tribal Resources and Traditional Cultural Places During New Construction (Overhead Transmission Facilities)

Component	Type of Physical Impact	Resource Type Impacted	Comments
New ROW	Loss of vegetation	Tribal resources	Loss of vegetation within, but not limited to, U&As and other Tribal areas of interest where Tribal fishing, hunting, and gathering activities take place could result in a medium to high adverse environmental impact on Tribal resources. These could include fish, food forests and foraging landscapes, and important foraging grounds for migratory populations of game.
		TCPs	Loss of vegetation could result in a medium to high adverse environmental impact on TCPs. If the TCP has been identified based on the presence of certain species, the removal or loss of that vegetation would be seen as a high impact. One example would be the removal of western red cedar (*Thuja plicata*), an important tree species to Tribes throughout the Northwest.
▪ Transmission towers ▪ Substations	Ground disturbance	Tribal resources	Adverse environmental impacts on Tribal resources within, but not limited to, U&As and Tribal areas of interest could be medium to high

Component	Type of Physical Impact	Resource Type Impacted	Comments
▪ Access roads and fencing ▪ Staging areas ▪ Pulling and tensioning areas			through habitat loss for migratory game and/or fish and loss of important foraging grounds for important food resources by the new construction of transmission towers, substations, access roads, and fencing and the creation of staging areas and pulling and tensioning areas within the boundaries where hunting, gathering, fishing, and other activities could take place.
		TCPs	Adverse environmental impacts on TCPs could be medium to high during the new construction of transmission towers, substations, access roads, and fencing and the creation of staging areas and pulling and tensioning areas within the boundaries of known and unknown TCPs.

ROW = right-of-way; **TCP** = Traditional Cultural Place; **U&A** = Usual and Accustomed Area

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from physical impacts on Tribal resources and TCPs during the new construction of overhead transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from medium to high.

Visual Impacts on Tribal Resources and TCPs

New construction of transmission towers, substations, access roads, and clearing of vegetation for the new ROW could have visual adverse environmental impacts on TCPs and Tribal resources, including U&As, which are often located within U&As and Tribal areas of interest and strongly associated with traditional beliefs of Native American Tribes (**Table 3.15-18**). The introduction of these structures can be a modern intrusion within the setting and feeling of these resources, which are usually important aspects of integrity and significance for a TCP or Tribal resource. Visual adverse environmental impacts may include the installation of new transmission facilities within the viewshed of these resources.

Table 3.15-18: Visual Impacts on TCPs and Tribal Resources During New Construction (Overhead Transmission Facilities)

Component	Type of Visual Impact	Resource Type Impacted	Comments
New ROW	Loss of vegetation	Tribal resources	Loss of vegetation for new ROW that is within a viewshed or location where Tribal resources are hunted, gathered, or fished, such as within U&As and Tribal areas of interest, could have a medium to high adverse environmental impact on a resource if setting is a significant aspect of the resource's integrity.
		TCPs	New ROW that results in vegetation loss within the viewshed of a TCP could result in a medium to high adverse environmental impact on the TCP if setting and feeling are significant aspects of the resource's integrity.
Transmission towers Substations	Modern intrusion	Tribal resources	Introduction of modern structures into the viewshed of locations where hunting, gathering, fishing, and other activities take place, such as U&As and Tribal areas of interest, could result in medium to high adverse environmental impacts on Tribal resources if setting and feeling are significant aspects of the resource's integrity.
		TCPs	Introduction of modern structures into the viewshed of TCPs could result in medium to high adverse environmental impacts on TCPs if setting and feeling are significant aspects of the resource's integrity.
Access roads and fencing	Modern intrusion	Tribal resources	Installation of access roads or fencing within the viewshed of locations where hunting, gathering, fishing, and other activities take place, such as U&As and Tribal areas of interest, could result in medium to high adverse

Component	Type of Visual Impact	Resource Type Impacted	Comments
			environmental impacts on Tribal resources if setting and feeling are significant aspects of the resource's integrity.
		TCPs	Installation of access roads or fencing within viewshed of a TCP could result in medium to high adverse environmental impacts if setting and feeling are significant aspects of the resource's integrity.

ROW = right-of-way; **TCP** = Traditional Cultural Place; **U&A** = Usual and Accustomed Area

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from visual impacts on Tribal resources and TCPs during the new construction of overhead transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from medium to high.

Underground Transmission Facilities

Activities for the new construction of underground transmission facilities would vary and depend on the scale of the facility and site characteristics. New construction could include a site preparation period of relatively short duration (e.g., a few months), followed by a longer construction and start-up period. It is assumed that the new construction of overhead transmission, per mile, would have a shorter duration than underground construction. Underground transmission facilities could have the following adverse environmental impacts during new construction:

- Physical Impacts
- Visual Impacts
- Physical Impacts on Tribal resources and TCPs
- Visual Impacts on Tribal resources and TCPs

Physical Impacts

Physical adverse environmental impacts on historic and cultural resources from ground disturbance for new construction of conduits and vaults would be greater than for overhead transmission facilities, as the area excavated for the conduit and vaults

would be much greater (**Table 3.15-19**). Physical impacts from secondary ground-disturbing activities, including those associated with new construction of access roads and staging areas, would be similar to adverse environmental impacts from overhead transmission facilities, assuming the extent of roads and staging areas is similar for both facility types.

Table 3.15-19: Physical Impacts on Historic and Cultural Properties During New Construction (Underground Transmission Facilities)

Component	Type of Physical Impact	Resource Type Impacted	Comments
Conduit	Ground disturbance	Archaeological sites	Utilizing open-trench construction methods to install new conduit within the boundaries of a known archaeological site could result in medium to high adverse environmental impacts if it occurred within the path of the trench.
	Collocation on bridges	Historic bridges	Installation of conduits on historic bridges could result in negligible to medium adverse environmental impacts, depending on whether the installation would alter the characteristics of the historic bridge that qualify it for NRHP or WHR eligibility.
▪ Vaults ▪ Access roads and fencing	Ground disturbance	Archaeological sites	Vaults require an expanded area of ground disturbance. If ground-disturbing adverse environmental impacts from vault, access road, and fence installations are proposed within the boundaries of a known archaeological site, the action could result in medium to high impacts.
Access roads and fencing	Replacement of gates/fences	Historic districts/parks and historic districts in parks	Loss of contributing gates or fences within historic districts, landscapes, and farmsteads could impact the integrity of the resource, resulting in negligible to high adverse environmental impacts, depending on whether the gates or fences contribute to

Component	Type of Physical Impact	Resource Type Impacted	Comments
			the significance of the historic property.
Staging areas	Ground disturbance and compaction	Archaeological sites	Ground disturbance associated with staging areas within the boundaries of a known archaeological site could result in medium to high adverse environmental impacts. Staging of equipment could lead to compaction of sediments, which could physically impact subsurface archaeological sites, resulting in medium to high impacts.
Underwater cable installation	Ground disturbance and compaction	Archaeological sites	Underwater cable installation could intersect underwater archaeological sites and result in negligible to high adverse environmental impacts, depending on whether the installation would alter the characteristics of the historic or cultural resource that qualify it for NRHP or WHR eligibility.

NRHP = National Register of Historic Places; **WHR** = Washington Heritage Register

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from physical impacts during the new construction of underground transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from negligible to high.

Visual Impacts

Overall, visual adverse environmental impacts on historic and cultural resources during new construction would be less for underground transmission facilities than for overhead construction since conduits are buried, and the viewshed would be smaller because of the lack of overhead structures (**Table 3.15-20**). Though the vegetation clearing for the ROW would likely be greater, the overall visual adverse environmental impacts would still result in fewer modern intrusions into the landscape within the viewshed of historic and cultural resources.

Table 3.15-20: Visual Impacts on Historic and Cultural Properties During New Construction (Underground Transmission Facilities)

Component	Type of Visual Impact	Resource Type Impacted	Comments
New ROW	Loss of vegetation	Historic districts	Change in setting from loss of vegetation could result in a negligible to high adverse environmental impact on the resource, depending on the location and extent of vegetation removal and whether that vegetation contributes to the setting of the historic property. If the vegetation does not contribute to the setting, the impact could be negligible.
		NHL	
		Historic trails/scenic byways[a]	
		Farmsteads	
		Parks and historic districts in parks	
		Archaeological sites	New ROW within the viewshed of an NRHP-eligible or listed archaeological site could result in negligible to high adverse environmental impacts. Specifically, a new ROW could remove vegetation in a way that impacts the setting of the archaeological site. The magnitude of the impact would depend on how important the setting is to the archaeological site.
Vaults Substations	Modern intrusion	Historic districts	Introduction of vaults and substations into the viewshed of these historic resources could have a negligible to high adverse environmental impact on these resources if setting is a significant aspect of integrity for the historic property. The magnitude of the impact would depend on whether the intrusion would alter the characteristics of the historic or cultural resource that qualify it for NRHP or WHR eligibility.
		NHL	
		Historic trails/scenic byways[a]	
		Farmsteads	
		Parks and historic districts in parks	
		Archaeological sites	Introduction of vaults and substations into the viewshed of NRHP-eligible archaeological sites could result in negligible to high adverse environmental

Component	Type of Visual Impact	Resource Type Impacted	Comments
			impacts, depending on whether setting is a significant aspect of integrity for the archaeological site. The magnitude of the impact would depend on whether the intrusion would alter the characteristics of the historic or cultural resource that qualify it for NRHP or WHR eligibility.
Access roads and fencing	Modern intrusion	Districts/parks and historic districts in parks	Introduction of modern gates and fencing could have a negligible to high impact on the historic resource, depending on whether the gates or fences contribute to the significance of the historic property.
		Farmsteads	

Notes:

(a) Historic trails/scenic byways are defined and analyzed in Section 3.12, Visual Quality.

NHL = National Historic Landmark; **NRHP** = National Register of Historic places; **ROW** = right-of-way; **WHR** = Washington Heritage Register

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from visual impacts during the new construction of underground transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from negligible to high.

Physical Impacts on Tribal Resources and TCPs

Physical adverse environmental impacts on TCPs and Tribal resources, which are often located within U&As and Tribal areas of interest, from ground disturbance for new construction of conduits and vaults would be greater than for overhead transmission facilities, as the area needed to excavate for conduits and vaults is much larger (**Table 3.15-21**). Physical impacts from secondary ground-disturbing activities, including those associated with new construction of access roads and staging areas, would be similar to adverse environmental impacts from overhead transmission facilities, assuming the extent of roads and staging areas is similar for both facility types. These physical impacts may also adversely impact Treaty-reserved access rights to Tribal resources.

Table 3.15-21: Physical Impacts on Tribal Resources and Traditional Cultural Places During New Construction (Underground Transmission Facilities)

Component	Type of Physical Impact	Resource Type Impacted	Comments
Conduit	Ground disturbance	Tribal resources	Adverse environmental impacts on Tribal resources, such as those within U&As and Tribal areas of interest, could be medium to high from habitat disturbance for migratory game and/or fish and disturbance of foraging grounds for important food resources by the installation of subsurface conduit within the boundaries where hunting, gathering, fishing, and other activities may take place.
		TCPs	Depending on the type of TCP, subsurface conduit installation could result in negligible to high adverse environmental impacts. Utilizing subsurface conduit could present an option to reduce physical, adverse environmental impacts within a known TCP, which could result in negligible adverse environmental impacts. TCPs with significant subsurface deposits could be impacted if the installation disturbs those deposits.
Vaults Access roads	Ground disturbance	Tribal resources	Adverse environmental impacts on Tribal resources could be medium to high from habitat loss for migratory game and/or fish and loss of important foraging grounds for important food resources by the new construction of vaults or access roads within the boundaries where hunting, gathering, fishing, and other activities may take place.
		TCPs	Adverse environmental impacts on TCPs could be medium to high through the new construction of vaults or access roads within the boundaries of known and unknown TCPs.

TCP = Traditional Cultural Place; **U&A** = Usual and Accustomed Area

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from physical impacts on Tribal resources and TCPs during the new construction of underground transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from negligible to high.

Visual Impacts on Tribal Resources and TCPs

Overall, visual adverse environmental impacts on TCPs and Tribal resources, which are often located within U&As and Tribal areas of interest and strongly associated with traditional beliefs of Native American Tribes, during new construction would likely be less for underground transmission facilities than for overhead since conduits are buried and the viewshed would be smaller with the lack of overhead structures (**Table 3.15-22**). Though the vegetation clearing associated with underground transmission facilities would be greater, the overall visual adverse environmental impacts would still result in fewer modern intrusions into the landscape within the viewshed of Tribal resources and TCPs.

Project-specific consultation with Tribes is essential to identifying and evaluating adverse environmental impacts. Project-specific environmental reviews would determine the actual level of impact and appropriate mitigation based on government-to-government consultation and cultural resource assessments.

Table 3.15-22: Visual Impacts on Traditional Cultural Places and Tribal Resources During New Construction (Underground Transmission Facilities)

Component	Type of Visual Impact	Resource Type Impacted	Comments
New ROW	Loss of vegetation	Tribal resources	Loss of vegetation for new ROW that is within a viewshed or location where Tribal resources are hunted, gathered, or fished, such as U&As and Areas of Tribal Interest, could have a medium to high adverse environmental impact on the resources if setting is a significant aspect of the resource's integrity.
		TCPs	New ROW that results in vegetation loss within the viewshed of a TCP could result in a medium to high adverse environmental impact if setting and feeling are significant aspects of the resource's integrity.

Component	Type of Visual Impact	Resource Type Impacted	Comments
Vaults Substations	Modern intrusion	Tribal resources	Introduction of vaults and substations into the viewshed of locations where hunting, gathering, fishing, and other activities may take place, such as U&As and Areas of Tribal Interest, could result in medium to high adverse environmental impacts on Tribal resources if setting and feeling are significant aspects of the resource's integrity.
		TCPs	Introduction of vaults and substations into the viewshed of TCPs could result in medium to high adverse environmental impacts on TCPs if setting and feeling are significant aspects of the resource's integrity.
Access roads and fencing	Modern intrusion	Tribal resources	Installation of access roads or fencing within the viewshed of locations where hunting, gathering, fishing, and other activities may take place, such as U&As and Areas of Tribal Interest, could result in a medium to high adverse environmental impact if setting and feeling are significant aspects of the resource's integrity.
		TCPs	Installation of access roads or fencing within the viewshed of a TCP could result in a medium to high adverse environmental impact if setting and feeling are significant aspects of the resource's integrity.

ROW = right-of-way; **TCP** = Traditional Cultural Place; **U&A** = Usual and Accustomed Area

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from visual impacts on Tribal resources and TCPs during the new construction of underground transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from medium to high.

Operation and Maintenance

Overhead Transmission Facilities

Activities for the operation and maintenance stage of overhead transmission facilities would vary based on the type of facility, scale, and site characteristics. Facilities are not expected to have staff on site daily, but maintenance crews are anticipated to be regularly deployed. Transmission facilities require ongoing maintenance for equipment and ROWs. Overhead transmission facilities could have the following adverse environmental impacts during the operation and maintenance stage:

- Physical Impacts
- Physical Impacts on Tribal Resources and TCPs

Physical Impacts

The only adverse environmental impacts on historic and cultural resources during the operation and maintenance of overhead transmission facilities would result from using access roads to gain access to transmission structures or maintaining the ROW, including vegetation trimming or clearing. Loss of vegetation within the boundaries of historic and cultural resources could result in a nil to low impact, assuming the extent of vegetation removal would be minimal for maintenance, and assuming that vegetation contributes to the setting of the historic property. If the vegetation does not contribute to the setting, the impact would be nil.

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from physical impact during the operation and maintenance of overhead transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from nil to low.

Physical Impacts on Tribal Resources and TCPs

The only adverse environmental impacts on TCPs and Tribal resources, which are often located within U&As and Tribal areas of interest, during the operation and maintenance of overhead transmission facilities could result from the use of access roads to gain access to overhead transmission facilities or maintaining the ROW, including vegetation trimming or clearing. Low to high adverse environmental impacts on Tribal resources and TCPs could result if the vegetation intersects locations where Tribal resources are hunted, gathered, or fished, such as within U&As and Tribal areas of interest. Low to high adverse environmental impacts on TCPs could result,

depending on the presence and nature of TCPs in the project area and whether vegetation loss diminishes the setting and feeling of the TCP.

Project-specific consultation with Tribes is essential to identifying and evaluating potential impacts. Project-specific environmental reviews will determine the level of impact and appropriate mitigation based on government-to-government consultation and cultural resource assessments.

Impact Determination: Adverse environmental impacts on Tribal resources and TCPs resulting from physical impact during the operation and maintenance of overhead transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from low to high.

Underground Transmission Facilities

Similar to overhead transmission facilities, activities for the operation and maintenance of underground transmission facilities would vary based on the type of facility, scale, and site characteristics. Facilities are not expected to have staff on site daily, but maintenance crews are anticipated to be regularly deployed. Transmission facilities require ongoing maintenance for equipment and ROWs, similar to any other linear industrial facility. Underground transmission facilities could have the following adverse environmental impacts during the operation and maintenance stage:

- Physical Impacts
- Physical Impacts on Tribal Resources and TCPs

Physical Impacts

Adverse environmental impacts on historic and cultural resources during the operation and maintenance of underground transmission facilities would result from using access roads to reach underground transmission facilities and maintaining the ROW. The adverse environmental impacts from this action would be relatively minimal, assuming most access roads have already been disturbed.

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from physical impact during the operation and maintenance of underground transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from nil to low.

Physical Impacts on Tribal Resources and TCPs

Adverse environmental impacts on TCPs and Tribal resources, which are often located within U&As and Tribal areas of interest, during operation and maintenance could result from the use of access roads to access ROW and underground transmission vaults, or from maintenance of the ROW that would involve trimming and clearing of vegetation. Maintaining the ROW could involve trimming and clearing of vegetation that could result in high adverse environmental impacts on Tribal resources if that vegetation intersects locations where Tribal resources are hunted, gathered, or fished, such as U&As and Tribal areas of interest. It may result in adverse environmental impacts on TCPs if the vegetation loss diminishes the setting and feeling of the TCP.

Project-specific consultation with Tribes is essential to identifying and evaluating potential adverse environmental impacts. Project-specific environmental reviews will determine the level of impact and appropriate mitigation based on government-to-government consultation and cultural resource assessments.

Impact Determination: Adverse environmental impacts on historic and cultural resources resulting from physical impacts on Tribal resources and TCPs during the operation and maintenance of underground transmission facilities are expected to vary depending on the scale of the project and site-specific conditions. In the absence of mitigation, these adverse environmental impacts could range from negligible to high.

Upgrade

Overhead Transmission Facilities

Upgrades to overhead transmission facilities would occur within existing ROWs without expanding the existing facility footprint or causing new ground disturbance. However, these upgrades may result in adverse environmental impacts on historic and cultural resources, including:

- Physical Impacts
- Visual Impacts
- Physical Impacts on Tribal resources and TCPs
- Visual Impacts on Tribal resources and TCPs

The adverse environmental impacts from upgrading overhead transmission facilities are often comparable to those of maintaining overhead transmission facilities. These

adverse environmental impacts are generally anticipated to be lower than those for modifying or constructing a new transmission facility due to several factors. Table 2.3-1 highlights how upgrading existing transmission facilities would generally result in fewer or less impactful adverse environmental impacts.

Underground Transmission Facilities

Upgrades to underground transmission facilities would occur within existing ROWs without expanding the facility footprint or causing new ground disturbance. However, these upgrades may result in adverse environmental impacts on historic and cultural resources, including:

- Physical Impacts
- Visual Impacts
- Physical Impacts on Tribal resources and TCPs
- Visual Impacts on Tribal resources and TCPs

The adverse environmental impacts from upgrading underground transmission facilities are often comparable to those of maintaining underground transmission facilities. These adverse environmental impacts are generally anticipated to be lower than those for modifying or constructing a new transmission facility due to several factors. Table 2.3-1 highlights how upgrading existing transmission facilities would generally result in fewer or less impactful adverse environmental impacts.

Modification

Overhead Transmission Facilities

Modifying existing overhead transmission facilities typically involves several key steps, each with specific requirements, timelines, and settings, as outlined in Chapter 2, Overview of Transmission Facilities, Development Considerations, and Regulations. The adverse environmental impacts of modifying existing transmission facilities would vary depending on the scale of the project-specific application. Overhead transmission facilities could have the following adverse environmental impacts on historic and cultural resources during the modification stage:

- Physical Impacts
- Visual Impacts
- Physical Impacts on Tribal resources and TCPs

- Visual Impacts on Tribal resources and TCPs

Adverse environmental impacts of modifying overhead transmission facilities could be similar to those of new construction but are anticipated to be lower. Table 2.3-2 highlights how modifying existing transmission facilities would generally result in fewer or less impactful adverse environmental impacts.

Underground Transmission Facilities

Modifying existing underground transmission facilities typically involves several key steps, each with specific requirements, timelines, and settings, as outlined in Chapter 2, Overview of Transmission Facilities, Development Considerations, and Regulations. The adverse environmental impacts of modifying existing transmission facilities would vary depending on the scale of the project-specific application. Underground transmission facilities could have the following adverse environmental impacts on historic and cultural resources during the modification stage:

- Physical Impacts
- Visual Impacts
- Physical Impacts on Tribal resources and TCPs
- Visual Impacts on Tribal resources and TCPs

Adverse environmental impacts of modifying underground transmission facilities could be similar to those of new construction, but are anticipated to be lower. Table 2.3-2 highlights how modifying existing transmission facilities would generally result in fewer or less impactful adverse environmental impacts.

3.15.3.3 No Action Alternative

Under the No Action Alternative, the Programmatic EIS would not be adopted as a planning or analytical framework. Instead, transmission facility siting and development would continue under existing state and local regulatory processes, with each project evaluated for environmental compliance without the benefit of the environmental review provided in this document. This approach would lack the advanced notice of potential serious environmental concerns for those planning transmission facilities, as well as Mitigation Strategies developed under the Programmatic EIS. As a result, environmental outcomes may be less predictable and consistent, and adverse environmental impacts could be greater.

3.15.4 Mitigation Measures

Under SEPA, there are six recognized forms of mitigation that agencies can apply to reduce or address adverse environmental impacts:

- **Avoiding the adverse environmental impact** altogether by not taking a certain action or parts of an action.
- **Minimizing adverse environmental impacts** by limiting the degree or magnitude of the action and its implementation.
- **Rectifying the adverse environmental impact** by repairing, rehabilitating, or restoring the affected environment.
- **Reducing or eliminating the adverse environmental impact** over time by preservation and maintenance operations during the life of the action.
- **Compensating for the adverse environmental impact** by replacing or providing substitute resources or environments.
- **Monitoring the adverse environmental impact** and taking appropriate corrective measures.

This section describes the Avoidance Criteria and Mitigation Measures that could apply to adverse environmental impacts from new construction, operation and maintenance, upgrade, and modification of transmission facilities.

All General Measures adopted for this Programmatic EIS, identified in Section 3.1, are relevant to this resource section. Applicants would be responsible for providing information within their application materials documenting their implementation of the General Measures.

Avoidance Criteria[22] that are relevant to this resource section are described below:

AVOID-21 – Physical Impacts on Historic and Cultural Resources: Avoid having equipment or infrastructure in areas occupied by historic and cultural resources.

Rationale: Physical impacts within the boundaries of historic and cultural properties may be considered an adverse effect if the feature impacted

[22] The complete list of Avoidance Criteria and their rationales can be found in Section 3.1 and Appendix 3.1-1.

contributes to the significance of the property. Avoiding physical impacts would preserve the integrity of the resource.

AVOID-22 – Visual Impacts on Historic and Cultural Resources: Avoid having equipment or infrastructure near or within the viewshed of historic and cultural resources.

Rationale: Visual impacts may be considered an adverse effect if the integrity of the historic or cultural property's setting and feeling are important to its significance. Avoiding visual intrusions or alterations to the viewshed of the property would maintain the integrity of its significant historic features.

AVOID-23 – Physical Impacts on Tribal Resources and TCPs: Avoid having equipment or infrastructure in areas occupied by Tribal resources, including first foods, and Traditional Cultural Places (TCPs).

Rationale: The significant setting, feeling, and association of Tribal resources make them susceptible to adverse physical environmental impacts. Avoiding physical impacts would preserve the integrity of these resources.

AVOID-24 – Visual Impacts on Tribal Resources and TCPs: Avoid visual adverse environmental impacts on Tribal resources and Tribal Cultural Places (TCPs).

Rationale: The significant setting, feeling, and association of Tribal resources make them susceptible to adverse visual impacts. Avoiding visual intrusions or alterations to the viewshed of these resources would maintain their integrity and physical features within the property's setting that contribute to its historic significance.

The Programmatic EIS is intended to support more efficient and effective siting and permitting of transmission facilities, consistent with the legislative direction in RCW 43.21C.408, by streamlining environmental review where projects incorporate the recommended planning and Mitigation Strategies. Applicants would be responsible for providing information within their application materials documenting the project's compliance with the above Avoidance Criteria. While total avoidance of all adverse environmental impacts is not required in order to use the Programmatic EIS, applicants are expected to demonstrate how their project aligns with the intent of the Avoidance Criteria, to the extent practicable. If specific Avoidance Criteria are not met, the applicant would provide an explanation and supporting information. Additional environmental analyses would be required as part of the documentation for SEPA for the Project. Additional mitigation could be required, depending on the nature of the

deviation and its potential to result in probable significant adverse environmental impacts.

Mitigation Measures have been identified to minimize adverse environmental impacts from transmission facility projects. These measures are intended to be broad so that they can be applied to most projects that would be covered under this Programmatic EIS. However, project-specific plans would be needed to adapt the measures for project-specific applications. The inclusion of a Mitigation Measure in this Programmatic EIS does not imply that a given adverse environmental impact is presumed to occur. Rather, the measures are provided to support early planning and the avoidance of adverse environmental impacts, streamlining project-specific environmental reviews when adverse environmental impacts are identified. Mitigation Measures are intended to serve as a set of potential strategies that the SEPA Lead Agency and applicants can draw from, depending on the specific environmental context and project footprint. Applicants and the SEPA Lead Agency retain discretion to:

- Propose alternative mitigation strategies that achieve equivalent or better outcomes.
- Demonstrate that certain Mitigation Measures are not applicable due to the absence of relevant adverse environmental impacts.

When impact determinations are identified as medium or high, then either the applicant would adopt applicable Mitigation Measures from this Programmatic EIS or the SEPA Lead Agency may require applicable mitigation to be implemented to reduce project-specific adverse environmental impacts. When impact determinations are low, applicable Mitigation Measures should still be considered by the applicant and the SEPA Lead Agency, as these Mitigation Measures would help to further reduce adverse environmental impacts, including the project's contribution to cumulative impacts. These Mitigation Measures would be implemented in addition to compliance with laws, regulations, environmental permits, plans, and design considerations required for transmission facilities.

The following Mitigation Measures could be adopted to mitigate adverse environmental impacts:

Hist/Cultural-1 – WISAARD Database: While planning transmission facilities, gather information on previously surveyed historic and cultural resources.

Rationale: This Mitigation Measure aims to gather information on previously surveyed historic and cultural resources on the Washington State Department of Archaeology and Historic Preservation online Washington Information System for Architectural and Archaeological Records Data database for National Register of Historic Places-listed and eligible historic properties (https://wisaard.dahp.wa.gov/) to help applicants plan project area corridors.

Hist/Cultural-2 – Early Tribal Engagement: Conduct early engagement with affected Tribes.

Rationale: This Mitigation Measure aims to meaningfully engage affected Tribes in advance of application to get information and input on historic and cultural properties and Tribal resources that may not be identified through publicly available background research and surveys.

Hist/Cultural-3 – Early Engagement: Conduct early engagement with other interested parties.

Rationale: This Mitigation Measure aims to engage interested parties, including the Washington State Department of Archaeology and Historic Preservation and local organizations, in advance of application to get information and input from these groups on historic and cultural properties that may not be identified through publicly available background research and surveys.

Hist/Cultural-4 – Survey Methodology Approval: Obtain concurrence from the Washington State Department of Archaeology and Historic Preservation (DAHP) and affected Tribes on historic and cultural resource survey methodologies prior to conducting the surveys.

Rationale: This Mitigation Measure aims to consult and obtain concurrence from DAHP and affected Tribes on historic and cultural resource survey methodology, which would include the project area and anticipated viewshed of the project.

Hist/Cultural-5 – Cultural Resources Awareness Training. Provide cultural resources awareness training to new construction, operation and maintenance, upgrade, and modification personnel.

Rationale: This Mitigation Measure ensures that project personnel are aware of regulations, protections, consequences, and procedures for an inadvertent discovery of cultural materials during new construction, operation and maintenance, upgrade, and modification.

Hist/Cultural-6 – Trenchless Construction for Known Archaeological Resources: Use trenchless construction methods where feasible to minimize physical and visual adverse environmental impacts on known archaeological resources.

Rationale: Trenchless construction methods can be used to install subsurface cable where entry and exit pits are located outside of boundaries of cultural resources, Tribal resources, or Tribal Cultural Properties. Trenchless construction reduces surface disruption as well as the visual presence of hanging cables, therefore minimizing potential adverse environmental impacts on resources.

In addition to the above Mitigation Measures, the following Mitigation Measures[23] developed for other resources may be applicable:

Geo-1 – Minimize Soil Disturbance: Minimize soil disturbance, including footprints related to access roads and permanent structures, to the greatest extent practicable. Minimize the use of construction techniques that would be harmful to topsoil composition, where feasible.

Veg-1 – Site Transmission Facilities in Existing ROW or Disturbed Areas: Site transmission facilities in existing ROW or disturbed areas, to the greatest extent practicable.

Vis-1 – Selection of Finishes: Use dull and/or dark painted surfaces, textured surfaces, and low-reflectivity finishes on facilities.

Vis-4 – Visual Screening: Use techniques such as berms, fencing, or vegetative screening to conceal or improve the appearance of distribution substations, aboveground vaults, and other facilities.

Vis-5 – Span Length: Maximize the span length when using overhead lines crossing highways and other linear viewing locations.

3.15.5 Probable Significant Adverse Environmental Impacts

Determining the significance of an adverse environmental impact involves consideration of context and intensity, which, in turn, depend on the magnitude and

[23] The rationales for the identified Mitigation Measures are provided in their respective resource sections.

duration of the impact. “Significant” in SEPA means a reasonable likelihood of more than a moderate adverse environmental impact on environmental quality. An adverse environmental impact may also be significant if its chance of occurrence is not great, but the resulting impact would be severe if it occurred (WAC 197-11-794).

Identification of adverse environmental impacts and assignment of discipline-specific ratings are based on a structured evaluation consistent with the criteria outlined in WAC 197-11-330. Significance determinations consider the context and intensity of potential adverse environmental impacts, using both quantitative and qualitative information where appropriate. Professional expertise does not substitute for regulatory compliance. Regulatory requirements establish the baseline for environmental analysis and mitigation. Professional experience is used to supplement this baseline, providing additional insight to identify whether mitigation measures beyond those required by regulation may be warranted. In cases where data are incomplete or unavailable, a conservative approach has been applied to ensure that potential adverse environmental impacts are not underestimated.

This Programmatic EIS weighs the potential adverse environmental impacts on historic and cultural resources that would result from transmission facilities after considering the application of laws and regulations; siting and design considerations, including agency guidance and BMPs; and Mitigation Strategies, and makes a resulting determination of significance for each impact. **Table 3.15-23** summarizes the adverse environmental impacts anticipated for the new construction, operation and maintenance, upgrade, and modification of transmission facilities.

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Table 3.15-23: Summary of Adverse Environmental Impacts, Mitigation Strategies, and Significance Rating for Historic and Cultural Resources

Adverse Environmental Impact	Project Stage	Description of Impact	Impact Determination Before Applying Mitigation	Mitigation Strategy Applied[a]	Significance After Applying Mitigation Strategy	Rationale for Significance Rating
Historic and Cultural – Physical Impacts	New Construction	Physical adverse environmental impacts on historic resources could result if the new construction of overhead or underground transmission facilities disturbs or removes contributing features, including trees, shrubs, and landscaping, within the NRHP boundary of NHLs, historic districts, farmsteads, listed parks, or historic districts. Physical impacts on cultural resources could result if new construction activities disturb a known or unknown archaeological site. Disturbance during new construction could include earthwork activities associated with creating new ROWs and installing transmission facility components, such as towers, substations, and access roads.	**Overhead:** negligible to high **Underground:** negligible to high	▪ **AVOID-21:** Physical Impacts on Historic and Cultural Resources ▪ **Hist/Cultural-1:** WISAARD Database ▪ **Hist/Cultural-2:** Early Tribal Engagement ▪ **Hist/Cultural-3:** Early Engagement ▪ **Hist/Cultural-4:** Survey Methodology Approval ▪ **Hist/Cultural-5:** Cultural Resources Awareness Training ▪ **Hist/Cultural-6:** Trenchless Construction for Known Archaeological Resources ▪ **Geo-1:** Minimize Soil Disturbance ▪ **Veg-1:** Site Transmission Facilities in Existing ROW or Disturbed Areas	Less than Significant	Impacts are unlikely to occur with regulatory compliance and implementation of the identified regulatory requirements, Avoidance Criteria, and Mitigation Measures. It is assumed that to reach a less than significant impact rating, all Mitigation Measures have been successfully applied and the SEPA and Section 106 Process have been completed with a No Adverse Effect Finding.
	Operation and Maintenance	Physical adverse environmental impacts on historic resources could result if the operation and maintenance of overhead and underground transmission facilities disturb or remove contributing features, including trees, shrubs, and landscaping within the NRHP boundary of NHLs, historic districts, farmstead, listed parks, or historic districts. Physical impacts on cultural resources from the operation and maintenance of overhead and underground transmission facilities could result if there are disturbances within the boundaries of a known archaeological site. Disturbances during operation and maintenance could include activities such as vegetation removal for ROW maintenance.	**Overhead:** nil to low **Underground:** nil to low			
	Upgrade	Physical adverse environmental impacts on historic resources could result from the upgrade of transmission facilities if construction activities disturb or remove contributing features within the boundaries of properties listed or eligible for listing in the NRHP, including NHLs, historic districts, farmsteads, and parks. Such impacts may include the removal of mature vegetation, alteration of landscape features, or ground disturbance within historically significant settings. For cultural resources, upgrades may result in physical impacts if earthwork or vegetation clearing occurs within or adjacent to known or unknown archaeological sites. These activities may include replacing or reinforcing transmission structures or upgrading substations and access roads. The severity of impacts will vary depending on the location, scope, and sensitivity of the resources affected.	**Overhead:** nil to low **Underground:** nil to low			

Adverse Environmental Impact	Project Stage	Description of Impact	Impact Determination Before Applying Mitigation	Mitigation Strategy Applied[a]	Significance After Applying Mitigation Strategy	Rationale for Significance Rating
Historic and Cultural – Visual Impacts	Modification	Physical adverse environmental impacts on historic resources could result if the modification of transmission facilities disturbs or removes contributing features within the NRHP boundary of NHLs, historic districts, farmsteads, or listed parks. Physical impacts on cultural resources could result from the modification of transmission facilities if there are disturbances within the boundaries of a known archaeological site. Disturbances could include earthwork activities associated with upgrading existing transmission facilities, expanding the ROW, or clearing vegetation.	**Overhead:** negligible to high **Underground:** negligible to high			
	New Construction	Visual adverse environmental impacts on historic resources during new construction could result from the loss of vegetation or installation of new transmission facilities, such as overhead transmission structures, substations, access roads, and fencing that are located within the viewshed of NHLs, historic districts, farmsteads, listed parks, or historic districts. Visual impacts on archaeological sites during new construction could result from the installation of new transmission facilities within the viewshed of a historic/precontact site. Changes in the visual setting of these resources have the potential to diminish the integrity of setting, feeling, and association of the historic property, which may be important to its significance.	**Overhead:** negligible to high **Underground:** negligible to high	▪ **AVOID-22:** Visual Impacts on Historic and Cultural Resources ▪ **Hist/Cultural-1:** WISAARD Database ▪ **Hist/Cultural-2:** Early Tribal Engagement ▪ **Hist/Cultural-3:** Early Engagement ▪ **Hist/Cultural-4:** Survey Methodology Approval ▪ **Hist/Cultural-5:** Cultural Resources Awareness Training ▪ **Hist/Cultural-6:** Trenchless Construction for Known Archaeological Resources ▪ **Geo-1:** Minimize Soil Disturbance ▪ **Veg-1:** Site Transmission Facilities in Existing ROW or Disturbed Areas ▪ **Vis-1:** Selection of Finishes ▪ **Vis-4:** Visual Screening ▪ **Vis-5:** Span Length	Less than Significant	Visual adverse environmental impacts on historic and cultural resources can be addressed through the application of regulatory requirements, Avoidance Criteria, and Mitigation Measures. With the application of these requirements and measures, it is expected that impacts on historic and cultural resources would be less than significant.
	Operation and Maintenance	Changes in the visual setting of historic resources and archaeological sites are not expected to occur during the operation and maintenance of overhead or underground facilities.	**Overhead:** N/A **Underground:** N/A			
	Upgrade	Changes in the visual setting of historic resources and archaeological sites are not expected to occur during the upgrade of overhead or underground facilities.	**Overhead:** N/A **Underground:** N/A			
	Modification	Visual adverse environmental impacts on historic resources could result from the modification of existing transmission facilities if the removal of vegetation and/or the installation of transmission towers, substations, and ROW corridors occurs within the viewshed of NHLs, historic districts, farmsteads, listed parks, or historic districts. Visual impacts on archaeological sites could result from the modification of existing transmission facilities if the upgrade or modification occurs within the viewshed of a historic/precontact site. Changes in the visual setting of these resources have the potential to diminish the integrity of setting, feeling, and association of the historic property, which may be important to its significance.	**Overhead:** negligible to high **Underground:** negligible to high			

Adverse Environmental Impact	Project Stage	Description of Impact	Impact Determination Before Applying Mitigation	Mitigation Strategy Applied[a]	Significance After Applying Mitigation Strategy	Rationale for Significance Rating
Cultural – Physical Impacts on Tribal Resources and TCPs	New Construction	New construction of transmission facilities could result in the loss of vegetation in areas where Tribal fishing, hunting, and gathering activities take place, such as U&As or Tribal areas of interest, thereby having a potential impact on Tribal resources. New construction activities could also impact food forests and foraging landscapes, and important foraging grounds for migratory populations of game. New construction of transmission facilities could impact TCPs if the new transmission facilities occur within the boundary of a known or unknown TCP. The loss of vegetation could impact TCPs if the TCP has been nominated due to the presence of certain species. New construction of underground transmission facilities could impact TCPs and Tribal resources, should TCPs and areas with Tribal resources that have significant subsurface deposits be disturbed.	**Overhead:** medium to high **Underground:** negligible to high	▪ **AVOID-23:** Physical Impacts on Tribal Resources and TCPs ▪ **Hist/Cultural-1:** WISAARD Database ▪ **Hist/Cultural-2:** Early tribal Engagement ▪ **Hist/Cultural-3:** Early Engagement ▪ **Hist/Cultural-4:** Survey Methodology Approval ▪ **Hist/Cultural-5:** Cultural Resources Awareness Training ▪ **Hist/Cultural-6:** Trenchless Construction for Known Archaeological Resources ▪ **Geo-1:** Minimize Soil Disturbance ▪ **Veg-1:** Site Transmission Facilities in Existing ROW or Disturbed Areas	Less than Significant	Adverse environmental impacts on Tribal resources and TCPs associated with the new construction, operation, upgrade, and modification of transmission facilities can be addressed through the application of regulatory requirements, Avoidance Criteria, and Mitigation Measures. It is expected that impacts on Tribal resources and TCPs would be less than significant only when project-specific applications comply with all applicable regulatory, avoidance, and mitigation requirements. Project-specific consultation with Tribes is essential to identifying and evaluating potential impacts. Project-specific environmental reviews will determine the actual level of impact and appropriate mitigation based on government-to-government consultation and cultural resource assessments.
	Operation and Maintenance	The only physical adverse environmental impact on Tribal resources and TCPs that could occur during operation and maintenance of transmission facilities would result from using access roads to access ROWs and underground transmission vaults or from maintaining ROWs, including trimming and clearing of vegetation. Impacts on Tribal resources and TCPs could result if the vegetation intersects locations where Tribal resources are hunted, gathered, or fished, such as U&As or Tribal areas of interest. Impacts on TCPs could result if the loss of vegetation diminishes the setting and feeling of the TCP.	**Overhead:** low to high **Underground:** negligible to high			
	Upgrade	Upgrades to transmission facilities could result in physical adverse environmental impacts on Tribal resources and TCPs if construction or vegetation management activities disturb areas used for fishing, hunting, gathering, or ceremonial purposes. These impacts may occur within U&As, Tribal areas of interest, or within the boundaries of known or unknown TCPs. Upgrades may involve reinforcing infrastructure or clearing vegetation, which could affect food forests, foraging landscapes, and migratory game habitats. If TCPs are associated with specific plant species or landscape features, vegetation loss or alteration could diminish the integrity of the TCP's setting, feeling, and association. Subsurface disturbances from underground upgrades may also affect buried cultural materials or sacred sites.	**Overhead:** low to high **Underground:** negligible to high			

Adverse Environmental Impact	Project Stage	Description of Impact	Impact Determination Before Applying Mitigation	Mitigation Strategy Applied[a]	Significance After Applying Mitigation Strategy	Rationale for Significance Rating
	Modification	Modification to existing transmission facilities could impact Tribal resources or TCPs if the disturbance impacts physical features that contribute to its significance. Vegetation removal or habitat loss could also impact food forests and foraging landscapes, and important foraging grounds for migratory populations of game. Modification to existing transmission facilities could physically impact Tribal resources and TCPs if the action results in the damage or destruction of resources or elements within the boundary of a TCP or Tribal resource.	**Overhead:** medium to high **Underground:** negligible to high			
Cultural – Visual Impacts on Tribal Resources and TCPs	New Construction	Introduction of new transmission facilities, including towers, substations, and access roads within the viewshed of Tribal resources, such as U&As or Tribal areas of interest, and TCPs, could result in adverse visual impacts on Tribal resources and TCPs. Loss of vegetation for new ROWs or transmission facilities that are within a viewshed of or intersect locations where Tribal resources are hunted, gathered, or fished could impact the resource. Changes in the visual setting of Tribal resources and TCPs may have the potential to diminish the resource's integrity of setting, feeling, and association, which may be important to its significance.	**Overhead:** medium to high **Underground:** medium to high	▪ **AVOID-24:** Visual Impacts on Tribal Resources and TCPs ▪ **Hist/Cultural-1:** WISAARD Database ▪ **Hist/Cultural-2:** Early Tribal Engagement ▪ **Hist/Cultural-3:** Early Engagement ▪ **Hist/Cultural-4:** Survey Methodology Approval ▪ **Hist/Cultural-5:** Cultural Resources Awareness Training ▪ **Hist/Cultural-6:** Trenchless Construction for Known Archaeological Resources ▪ **Geo-1:** Minimize Soil Disturbance ▪ **Veg-1:** Site Transmission Facilities in Existing ROW or Disturbed Areas ▪ **Vis-1:** Selection of Finishes ▪ **Vis-4:** Visual Screening ▪ **Vis-5:** Span Length	Less than Significant	Adverse environmental impacts on Tribal resources and TCPs associated with the new construction, operation, upgrade, and modification of transmission facilities can be addressed through the application of regulatory requirements, Avoidance Criteria, and Mitigation Measures. With the application of these requirements and measures, it is expected that impacts on Tribal resources and TCPs would be less than significant.
	Operation and Maintenance	Changes in the visual setting of Tribal resources and TCPs are not expected to occur during the operation and maintenance of overhead and underground facilities.	**Overhead:** N/A **Underground:** N/A			
	Upgrade	Changes in the visual setting of Tribal resources and TCPs are not expected to occur during the upgrade of overhead and underground facilities.	**Overhead:** N/A **Underground:** N/A			
	Modification	Potentially taller or different types of transmission structures could expand or disrupt the viewshed and include additional Tribal resources and TCPs. Introduction of modern structures into the viewshed of these resources could impact these resources if setting is a significant aspect of integrity for the Tribal resource or TCP. Changes in the visual setting of Tribal resources and TCPs may have the potential to diminish a site's integrity of setting, feeling, and association, which may be important to its significance.	**Overhead:** medium to high **Underground:** medium to high			

Notes:

[a] Appendix 3.1-1 provides a detailed listing of each Mitigation Strategy. This appendix serves as a reference section that can be consulted independently of the main text. This is particularly useful for detailed guidance and technical specifications that may be referred to multiple times. Additionally, including this information in an appendix allows for easier updates and revisions. If Mitigation Strategies or guidance changes, the appendix can be updated without altering the main content.

N/A = not applicable; **NHL** = National Historic Landmark; **NRHP** = National Register of Historic Places; **ROW** = right-of-way; **SEPA** = Washington State Environmental Policy Act; **TCP** = Traditional Cultural Place; **U&A** = Usual and Accustomed Area; **WISAARD** = Washington Information System for Architectural and Archaeological Records Data

3.15.6 Environmental Sensitivity Map

Project-specific applications require a comprehensive analysis to identify the site-specific adverse environmental impacts on resources and determine the suitability of this Programmatic EIS. Environmental review may be phased by incorporating relevant information from this Programmatic EIS by reference while evaluating site-specific adverse environmental impacts of individual project applications. For more information on phased reviews, please refer to Chapter 1, Introduction.

Each project-specific application would include details about the proposal's location and site-specific conditions. This Programmatic EIS provides environmental sensitivity maps that, when used alongside project-specific data, could support more informative and efficient environmental planning. An online mapping tool has also been developed to provide public access to the most current data used in creating these environmental sensitivity maps.

Figure 3.15-4 presents the environmental sensitivity map for historic resources, identifying areas of varying sensitivity based on the siting criteria described in the following sections.

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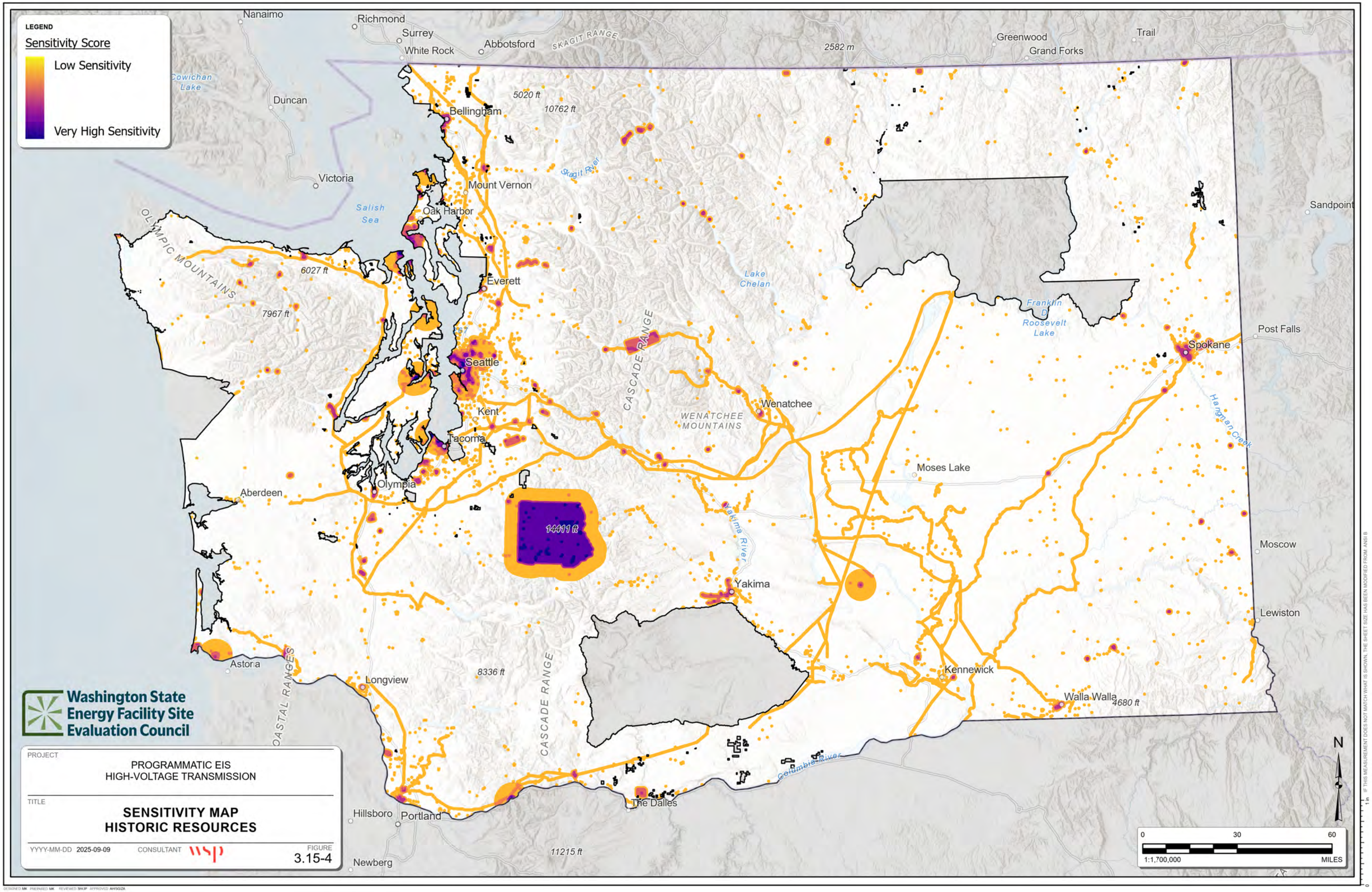
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Sensitivity Score
Low Sensitivity
Very High Sensitivity
Nanaimo
Richmond
Surrey
White Rock
Abbotsford
SKAGIT RANGE
2582 m
Greenwood
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Trail
Cowichan Lake
Duncan
5020 ft
10762 ft
Bellingham
Victoria
Skagit River
Mount Vernon
Salish Sea
Oak Harbor
Sandpoint
OLYMPIC MOUNTAINS
6027 ft
7967 ft
Everett
Lake Chelan
Franklin D Roosevelt Lake
Post Falls
Spokane
Seattle
CASCADE RANGE
Kent
Wenatchee
WENATCHEE MOUNTAINS
Hangman Creek
Tacoma
Moses Lake
Olympia
Aberdeen
14411 ft
Yakima River
Moscow
Yakima
Lewiston
Astoria
COASTAL RANGES
8336 ft
Longview
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Walla Walla
4680 ft
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Washington State Energy Facility Site Evaluation Council
PROJECT
PROGRAMMATIC EIS
HIGH-VOLTAGE TRANSMISSION
TITLE
SENSITIVITY MAP
HISTORIC RESOURCES
YYYY-MM-DD 2025-09-09
CONSULTANT
FIGURE
3.15-4
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3.15.6.1 Environmental Sensitivity Map Criteria Cards

The environmental sensitivity map evaluates various siting criteria and assigns sensitivity levels to geographic areas based on their potential for adverse environmental impacts, as analyzed in this Programmatic EIS. Each criterion was assigned a sensitivity level (1, 2, or 3), with Level 3 representing the highest sensitivity. Criteria cards illustrate the spatial extent of the siting criteria chosen. A summary of the criteria cards is provided below. Appendix 3.1-2 details the data preparation process for the criteria cards.

Historic Districts – Sensitivity Level 3

Figure 3.15-5 illustrates the spatial extent of historic districts and places registered within the State of Washington, plus a 0.5-mile buffer (DAHP 2025a).

National Historic Landmarks - Sensitivity 3

Figure 3.15-6 illustrates the spatial extent of NHLs registered within the State of Washington that are likely to be in the viewshed of transmission facilities (DAHP 2025a, 2025b).

Historic Districts – Sensitivity 2

Figure 3.15-7 illustrates areas that are at a minimum of 0.5 miles and a maximum of 1 mile from historic districts and places registered within the State of Washington (DAHP 2025a).

National Historic Landmarks - Sensitivity 2

Figure 3.15-8 illustrates areas that are at a minimum of 1 mile and a maximum of 5 miles from NHLs registered within the State of Washington that are likely to be in the viewshed of transmission facilities (DAHP 2025a, 2025b).

Historic Places - Sensitivity 2

Figure 3.15-9 illustrates the spatial extent of historic places and properties registered with the state of Washington from the Historic Property Inventory, including a 0.5-mile area surrounding each historic place (not including NHLs or properties from the Washington Heritage Barn Register) (DAHP 2025).

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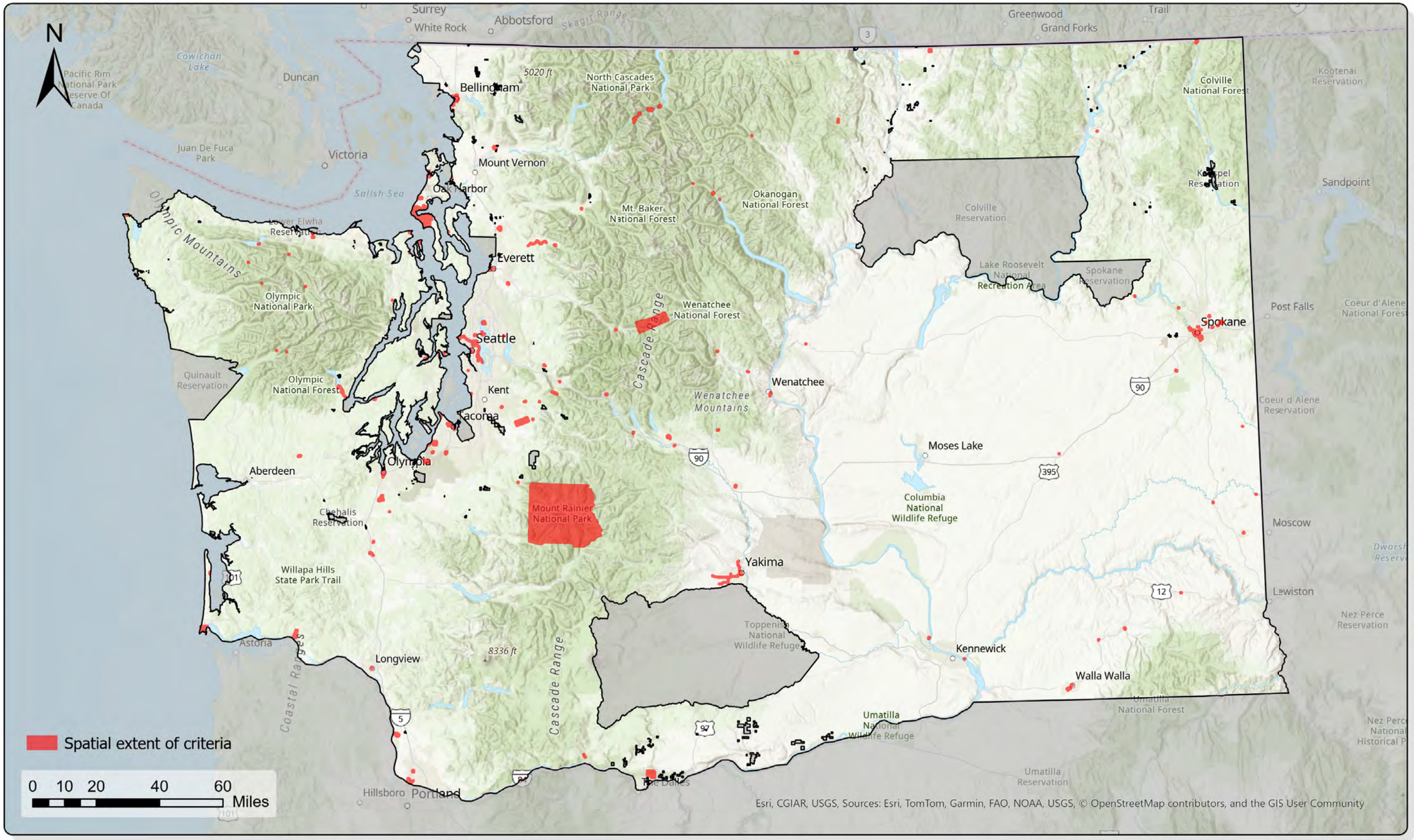
Historic Districts - Sensitivity Level 3

Washington State Energy Facility Site Evaluation Council



HISTORIC AND CULTURAL RESOURCES

Figure 3.15-5

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National Historic Landmarks - Sensitivity Level 3

Washington State Energy Facility Site Evaluation Council

HISTORIC AND CULTURAL RESOURCES

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Figure 3.15-6

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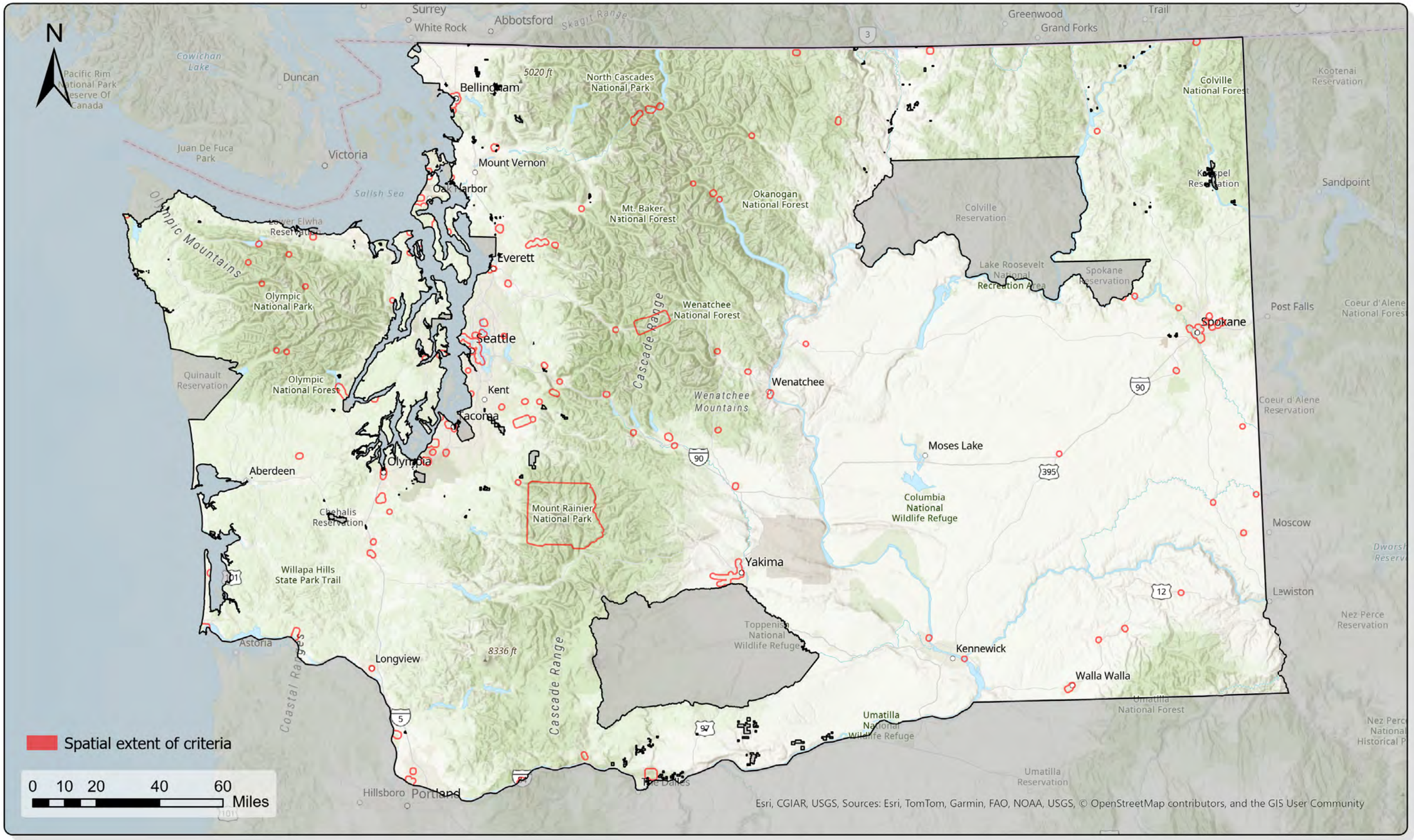
Historic Districts - Sensitivity Level 2

Washington State Energy Facility Site Evaluation Council



HISTORIC AND CULTURAL RESOURCES

Figure 3.15-7

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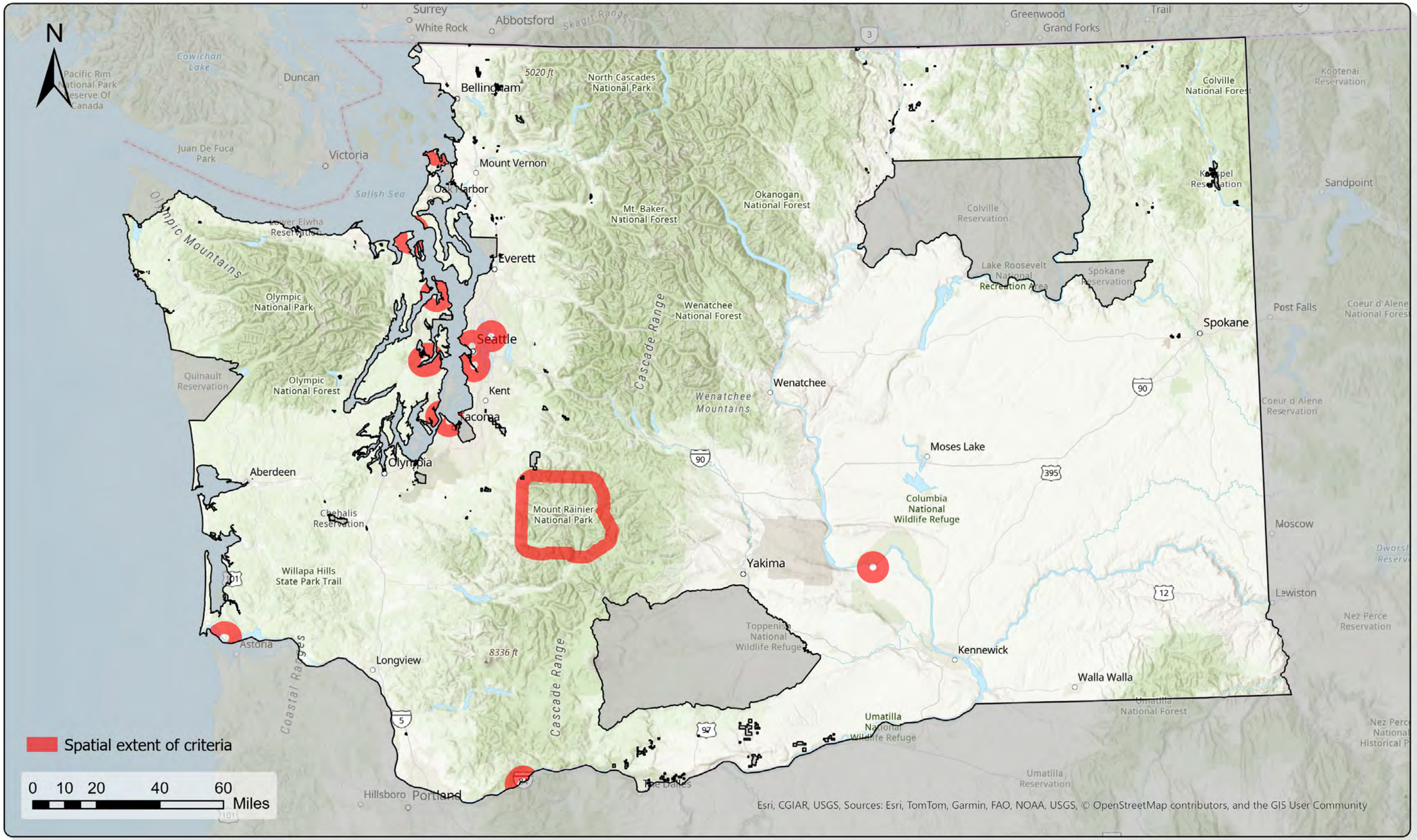
National Historic Landmarks - Sensitivity Level 2

Washington State Energy Facility Site Evaluation Council



HISTORIC AND CULTURAL RESOURCES

Figure 3.15-8

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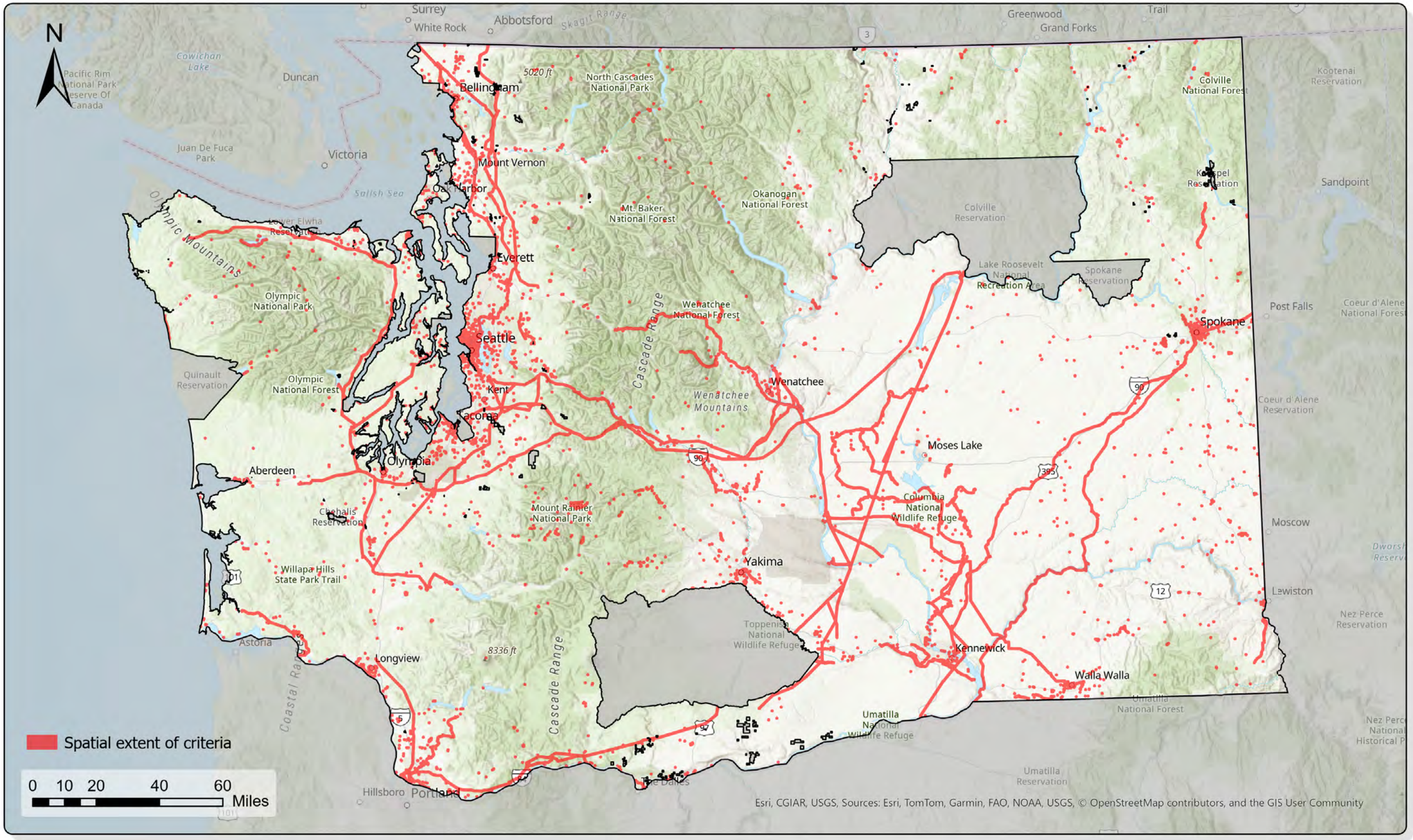
Historic Places - Sensitivity Level 2

Washington State Energy Facility Site Evaluation Council



HISTORIC AND CULTURAL RESOURCES

wsp

Figure 3.15-9

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