



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

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TO: Heather Gundersen

FROM: Russell Holter

CC: Transportation Archaeologists: Lucie Tisdale (OR-SHPO); Matthew Sterner (WA-SHPO)

RE: Columbia River Crossing

It has recently come to my attention that language changes to the Screening and Evaluation framework were recommended by the CRC Taskforce. The current language states that Cultural Resources will be evaluated based upon "Avoiding or Minimizing adverse impacts to historic, prehistoric and cultural resources." It has been suggested that this language be changed to "Avoid or minimize adverse impacts, or where practicable, enhance cultural resources." As you know, I have been resistant to any changes in this language. There are several reasons for this resistance, which I shall outline for you.

1. Language contained in Federal law does not allow for the enhancement of cultural resources. It is not found in Section 106 of the National Historic Preservation Act nor is this term used in connection with Section 4(f).
2. The CRC Taskforce appears to be using this term arbitrarily only for the sake of being consistent with other environmental resource language. Though screening project alternatives for their ability to enhance natural environmental resources may be a legitimate and worthy goal, I contend that you cannot enhance cultural resource sites; they can only be diminished in integrity or destroyed. The other alternative is to record the site but that constitutes mitigation and mitigation cannot be a driver for selecting project alternatives. The preservation and protection of cultural resources is the only language that would be appropriate in adding to the Screening and Evaluation Framework.
3. The term 'enhance' is insufficiently defined. Interested and affected tribes will take note of this new terminology and will undoubtedly take steps to affect immediate changes. Native American graves, belowground cultural resources, and Traditional Cultural Properties cannot, and will not, be enhanced by the presence of this project.
4. The term 'enhance' leaves open to interpretation as to how the term could be used in relation to the built environment too. The only appropriate enhancements to National Register eligible properties, districts, and landmarks are found in the Secretary of the Interior's Standards for Historic Preservation. These standards should only be defined in terms of mitigation and are thus not appropriate as a means of screening and evaluating project alternatives.

Your prompt attention and consideration of this matter is greatly appreciated.