



July 10, 2018

Allyson Brooks, Ph.D.
WA State SHPO
Department of Archaeology & Historic Preservation
1110 Capitol Way, South, Ste. 30
Olympia, WA 98504
Project Tracking Code: 2018-04-02909

Subject: Salish Lodge and Spa Expansion Archaeology Report

Dr. Brooks,

Thank you for the opportunity to review the above named report. The report is very well written and is based on good archaeological methods and reasoning. We have nothing but the upmost respect for Kelly Bush and her team and would like to thank them for their dedication and hard work on this project. The Snoqualmie Tribe Department of Archaeology & Historic Preservation offers the following comments.

The report states that there is “*no evidence of precontact use*” of this site while also conceding that:

It is worth noting that shovel testing is a sampling strategy that attempts to increase the visibility of buried sediments in areas of sediment build up either due to decomposition of organics or the movement of sediments due to water, wind or colluvial action. This is a possibility that buried archaeological deposits may exist within the project area. We have just reduced the risk of encountering sites larger than our target testing program pattern during any kind of ground disturbance. We believe that these parcels have likely seen a wide variety of land-use activities over the length of the life of this landform. As long as people have been living in and around the Snoqualmie Valley they would have used this gently sloping glacial outwash terrace for a wide variety of activities, including but not limited to: harvesting plants for food, medicine and tools; hunting; a safe defensive position; and for burying their dead.

This conclusion highlights our concerns about any project located in the area around Snoqualmie Falls. A location can be culturally significant even if there is no current evidence of archeological findings. Given the number of isolated archeological finds that



have been reported in the immediate area of this project, it seems rational to believe that there are more unknown findings around the project location. Furthermore it seems reasonable to conclude that the sheer number of isolates in the vicinity only supports our longstanding claims of the historic use of the area.

The report also collaborates our views of the cultural significance of the area:

In discussions with both the Snoqualmie and Muckleshoot Indian Tribes, tribal representatives have been very clear with ERCI's Kelly R. Bush that the lands around Snoqualmie Falls and the travel corridors to the Falls are of paramount cultural significance. The inherent value of the Falls to native people who have lived in and used this valley cannot be overstated.

Various projects continue to desecrate this sacred site, however this does not diminish the cultural and spiritual significance of the overall area. Representatives of both the Snoqualmie Tribe and the Muckleshoot Tribes have expressed how important this area is. Members of the Tulalip Indian Tribes, Yakama Nation, Stillaguamish Tribe of Indians, and others have expressed similar sentiments over the years as the location continues to be developed.

One topic that this report omits that must be considered and discussed is how this project effects the traditional cultural property (TCP) of Snoqualmie Falls. The Snoqualmie Tribe's position on the cultural and spiritual significance of the entire area around Snoqualmie Falls is well documented.

We encourage all parties to look at the *Memorandum of Agreement (MOA) Among the U.S. Army Corps of Engineers, Seattle District, The Advisory Council on Historic Preservation, and the City of Snoqualmie* for some of the more recent concerns. Though we did not sign the MOA nor agree with the project, we were instrumental in bringing the importance of the area to the forefront of the discussion. By signing the MOA both the City of Snoqualmie and the Muckleshoot Indian Tribes conceded a few very important points worth reemphasizing. The following statements are taken directly from the MOA:

- *The Snoqualmie Indian Tribe considers Snoqualmie Falls a sacred site central to the Tribes' identity*
- *One of the most important qualities and an integral part of the cultural experience of the Snoqualmie Indian Tribe is the natural setting that surrounds the spiritual sanctity of Snoqualmie Falls*



- *The Snoqualmie Indian Tribe has stated the current National Register of Historic Places Registration Form does not adequately document the Snoqualmie Falls TCP. The Tribe has further stated the current National Register Nomination Form and TCP boundaries shown thereon fail to reflect the importance and cultural significance of the site to the Tribe.*
- *The Snoqualmie Indian Tribe considers that anything diminishing the natural environment of the Snoqualmie Falls and the surrounding view shed diminishes the integrity of the Fall's setting and its religious and cultural feeling and association for the Tribe. Based on the Corps' understanding of the significance of the Snoqualmie Falls to the Snoqualmie Indian Tribe, and the nature of the permitted activities, the Corps has determined that the construction of the Tokul Road Roundabout will adversely affect the integrity of the Snoqualmie Falls TCP*

The nature of this particular project is more destructive to the area than the Tokul Roundabout was and thus has a greater potential to negatively impact Snoqualmie Falls. Using the parameters of the Tokul Roundabout MOA previously established (and agreed to by most of the current parties involved in the Salish Expansion) the effects on the TCP still need to be discussed.

In keeping with the spirit of creating a positive relationship and protecting a location significant to all of us, we suggest a meeting with all interested parties to discuss how to address these effects. Until such a meeting occurs we feel that although well written, this report does not fully address the full spectrum of the impacts of the Salish Expansion to the TCP and surrounding area.

hisk'wu?

A handwritten signature in black ink, appearing to read "Steven Mullen-Moses".

Steven Mullen-Moses
Director of Archaeology & Historic Preservation
sduk^walbix^w
steve@snoqualmietribe.us