

The Confederated Salish and Kootenai Tribes

January 29, 2007

Gail Celmer  
Regional Archaeologist  
U.S. Army Corps of Engineers  
Northwestern Division  
Portland, Oregon (CENWP-PM-E)

Dear Ms. Celmer,

I apologize that these comments are a few days late, but still feel it is important to address the issues we discussed at the Spokane meeting on December 12, 2006. We also want to thank you for this opportunity to respond to the draft Programmatic Agreement for the Federal Columbia River Power System (FCRPS).

As I stated at the meeting I believe it is important for all participants to recall the commitments and intentions that were stated in the meetings from 1997 on that initiated the process we find ourselves in today. These initial commitments are not clearly reflected in the current PA. For example the Intertie Development and Use (IDU) is not mentioned in this PA. We need to reflect on past commitments and make sure we are all involved in setting a course into the future. Consultation is a tool to ensure this happens.

The second issue is the concern for the prioritization process. The current draft lists Traditional Cultural Properties (TCP) in what appeared to be a lower priority, behind archaeology. We were assured at this meeting that the list did not intend to put one site type or approach as more important than another, but there needed to be a tracking of priorities for funding. The major concern is that a PA is to design a unique approach to Section 106 of the National Historic Preservation Act (NHPA). The main focus for the last 27 years has been Criterion D and Archeology; there has been millions of dollars spent on this approach. We have numerous collections in curation facilities and each year Federal Agencies seem to struggle for funding to meet their curation responsibilities.

Yet the Federal agencies want to excavate more sites in areas where they already have representative samples. Lets look at what has already been collected rather than view excavation as the only alternative in the Section 106 process. Meanwhile sites that were eligible 27 years ago are eroding away and a cultural landscape continues to disappear.

The CSKT would like to see more creative mitigation done with an emphasis on Criteria A, B, and C. With this in mind a research design could be developed for the Columbia River System. Each tribe has place names, legends, and stories for the entire stretch of the Columbia River System. Water could be a main focus for it is the water that connects all of us. There are stories and some information that may not be appropriate to share, but each tribe could identify general information that could be used to enrich the project.

Another issue that is critically important to us is the review of collections to ensure that any culturally sensitive material, items of cultural patrimony, be identified and placed back where it came from or repatriated on the reservation if the original area is not accessible. We would like to see this addressed in the PA and the process identified.

We would like to see a paragraph clearly outlining the relationship between the FCRPS PA and the individual Project-specific PAs or HPMPs. If any issue in the FCRPS PA is not specifically identified in the project specific documents, which takes precedence? Take for example the issue of cultural patrimony.

The importance of consultation cannot be stressed enough. Discussing issues is the only way we can present our differing world-views and come to compatible solutions and avoid misunderstandings.

Again we thank you for this opportunity to express our comments and look forward to working with you in the future. If you have any questions please call me at (406) 675-2700.

Respectfully,

Marcia Pablo  
CSKT Historic Preservation Officer