



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

SECURITY AND CONTINUITY OF OPERATIONS

October 8, 2013

In reply refer to: NN-1

Richard Till  
Friends of the Columbia Gorge  
522 SW 5<sup>th</sup> Ave, Ste 720  
Portland, OR 97204

### FOIA BPA-2013-01584-F

Dear Mr. Till:

This is a partial response to your request for records that you made to the Bonneville Power Administration (BPA), under the Freedom of Information Act (FOIA), 5 U.S.C. 552.

**You requested the following:**

“Two documents; the determination of eligibility and effect, and the determination of eligibility that was provided to the keeper of the National Register.”

**Response:**

Enclosed are two letters responsive to your request. BPA is releasing them without redaction.

The enclosures to each document are still undergoing review and will be released to you when that process is complete. We hope to be finished before October 31, 2013.

Please contact Kim Winn, FOIA Specialist, at 503-230-5273 with any questions about this letter.

Sincerely,

*/s/Christina J. Munro*  
Christina J. Munro  
Freedom of Information/Privacy Act Officer

Enclosures: November 13, 2012 letter to the Department of Archeology & Historic Preservation,  
Olympia, WA  
August 5, 2013 letter to the National Park Service, Washington, DC



## Department of Energy

Official File

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

August 5, 2013

In reply refer to: KEC-4

Ms. Carol Shull, Interim Keeper  
National Park Service  
National Register of Historic Places  
1849 C Street, NW (2280)  
Washington, DC 20240

Subject: Eligibility of a Cultural Landscape at Celilo Falls for its association with Lewis & Clark and the Corps of Discovery and the Lewis & Clark National Historic Trail.

Dear Ms. Shull:

The Bonneville Power Administration (BPA) is seeking your determination of eligibility regarding a proposed "cultural landscape" in and along the Columbia River encompassing the inundated Celilo Falls and portions of Oregon and Washington for its association with Lewis & Clark and the Corps of Discovery and the Lewis & Clark National Historic Trail. We seek your determination pursuant to 36 CFR 800.4(b)(2) and 36 CFR 63.2.

BPA found the landscape *not eligible* for the National Register. The Oregon State Historic Preservation Office and the U.S. Forest Service Columbia River Gorge National Scenic Area have concurred with BPA's determination. The Washington Department of Archaeology and Historic Preservation, the Lewis & Clark National Historic Trail (the Trail) unit of the National Park Service, and the Yakama Nation do not concur. In addition to this letter and attachments, we are enclosing our determination letter, the paper from the National Park Service (NPS) referenced below, and the letters received from the consulting parties.

### Background

BPA is constructing a new 500-kilovolt (kV) transmission line in an existing right-of-way from its existing Big Eddy Substation near The Dalles in Wasco County, Oregon to the Knight Substation northwest of Goldendale in Klickitat County, Washington. The line will span the Columbia River and Gorge at Lake Celilo, downstream of the existing Harvalum-Big Eddy No. 1 transmission line, which it will ultimately replace. Based on the limited window of transmission outages that can be sustained on this line, BPA is currently anticipating beginning construction in this area in January 2014. Therefore, it is imperative that we receive a timely response in order to keep moving forward with our consultation process.

Below the existing and planned transmission line crossing, the waters of Lake Celilo inundate basalt rock formations that, prior to the construction of The Dalles Dam, formed the nucleus of Celilo Falls (The Falls), a site of acute cultural importance to the Native American peoples of the Columbia River Gorge and Basin. The Falls themselves played a part in the Lewis & Clark Expedition and the Corps of Discovery (Corps) who were obliged to portage their canoes and equipment around them on both the out-bound and in-bound legs of their journey.

When studying the Trail as part of the current undertaking, BPA considered the Lewis & Clark cultural landscape (Gladstone 2012:4-5). This area consists of 494 acres centered on Lake Celilo and extends to both

the Oregon and Washington shorelines. BPA's Big Eddy-Knight transmission line right-of-way runs through the western portion of this area.

### **Determination of Eligibility**

Belatedly in the process and timeline for the transmission line project, the NPS identified The Falls as part of a "cultural landscape" with "historical significance that makes it eligible for listing on the National Register of Historic Places (Gladstone 2012:2)." In its evaluation of the site, the NPS fails to explain its decision in light of the criteria of eligibility (36 CFR 60.4). Given the thrust of their argument throughout the assessment BPA assumes they consider the site eligible for inclusion under criterion A (36 CFR 60.4(a)) and B (36 CFR 60.4(b)). Criterion C does not apply to this setting. In correspondence between BPA and the NPS, the NPS stated that due to the nature of the expedition, "Archaeological evidence related to Lewis and Clark is extremely ephemeral. There is only one verified campsite of the hundreds of camps they made." Furthermore, they maintained that the physical campsite was only "one component of this significant site that includes documentation of the people encountered, mapping of the site and the portage itself (e-mail correspondence, March 8, 2013, attached)." By this reasoning criterion D would also be considered unlikely as a basis for their determination of eligibility.

BPA cannot concur with the recommendation of the NPS. While certainly accepting the association of the Corps with this area, BPA has determined that the accumulative impact of substantial and varied modern developments, practices, and actions have combined to undermine to a critical degree all aspects of integrity, namely; location, design, setting, materials, workmanship, feeling and association. The Falls and portage routes, both essential physical features central to the actions of the Corps at this location, are either inundated or buried below an operating railroad. Given the importance of the site under criteria A and B, the extensive alterations to the physical landscape that have occurred since the Corps' passage, render the area ineligible for inclusion in the NRHP. In order to be considered eligible under criteria A or B, a site must retain "the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact (National Register Bulletin 15 1991:46)."<sup>1</sup> Furthermore, *National Register Bulletin 32: Guidelines for Evaluating and Nominating Properties Associated with Significant Persons* states "a basic test of the integrity of a property significant under National Register Criterion B is whether the significant person(s) associated with the resource would recognize it as it exists today (National Register Bulletin 32 1990:23)." With the inundation of The Falls and in its place a wide, easily navigable lake, not to mention the imposing railroad presence, the answer to this question is 'no'.

BPA believes that current level of integrity, including inundation and burial, fails to retain "the essential physical features" required for the NPS defined site to be considered eligible to the NRHP for its association with Lewis and Clark. Consequently, on June 20, 2013, BPA issued a determination of *not eligible* for inclusion in the NRHP for the NPS defined landscape.

### **Additional Issues**

On June 27 and July 12, 2013 the Washington State Department of Archaeology and Historic Preservation (DAHP) and the Oregon State Historic Preservation Office (OR SHPO) respectively, responded to BPA's determination. OR SHPO concurred with BPA stating "that as a result of the alteration of the natural

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<sup>1</sup> Please note that in their response, the Yakama Nation correctly point out that in the BPA June 20 determination of effect, where BPA reference NPS Bulletin 30, we should have referenced NPS Bulletin 15.

landscape and a lack of physical evidence, the Trail segment at Celilo Falls lacks sufficient historic integrity to be listed in the National Register of Historic Places.” DAHP did not concur with BPA’s determination and went on to defer to the findings of the NPS report “on the eligibility and significance” of the Lewis & Clark National Historic Trail at Lake Celilo.

While BPA accepts aspects of the NPS study, there are elements of the study that present cause for concern. As a result, in addition to presenting you with our original determination as amended, we also include a discussion of points and assertions made in the NPS study, attached.

The NPS study acknowledges the loss or absence of key components that are now either destroyed or inundated, “Significant damage has occurred to the site including inundation from damming (sic), blasting to the cliff face for railroad construction material, erection of a transmission line tower on top of the bluff and an area of off road vehicle use and excavation disturbance below the bluff... (Gladstone 2012:26);” to this list could be added the construction of railroad lines on both banks, the construction of a vertical lift railroad bridge spanning the Columbia River through the center of the site, the construction of the now inundated Celilo Canal, the now defunct Oregon Portage Railroad, graveled access roads on both banks, and Interstate 84 which forms the southern boundary of the site. However, the study goes on to assert that despite all these substantial and extensive changes to the site, it maintains integrity of setting, feeling and association as a result of “the overall landscape patterns (Gladstone 2012:29).”

BPA has no choice but to disagree with this conclusion. The NPS view is at odds with *National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes*, which states in relevant part:

historic integrity, a measure of a property's evolution and current condition, is also necessary. A comparison of the changes experienced by a group of properties related by common historic contexts helps define the historic characteristics and qualities of integrity that qualify a rural property for listing. Recent changes that have erased historic characteristics, and do not have exceptional importance, make a property ineligible, even if scenic qualities are still present

While BPA previously determined the Corps’ portage route through this area serves as a contributing element to the eligibility of the nearby Sk’in Village Cultural District in Washington (a copy of this determination of eligibility, concurred on by DAHP is enclosed), BPA does not believe that sufficient physical integrity of the proposed NPS landscape remains at the site to warrant the creation of an eligible cultural landscape affiliated with the Lewis & Clark expedition in and of itself. As a feature of a district, the Trail can lack individual distinction because it achieves significance as an event that occurred within the Sk’in Cultural District, an eligible property with a 10,000 year history of occupation (National Register Bulletin 15, 1991:5). When examined independently and in its own right, the integrity is lacking.

### **Conclusion**

BPA believes that our determination of *not eligible* regarding the NPS defined Lewis & Clark cultural landscape is appropriate and is based on an adequate level of documentation consistent with *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, *National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes*, *National Register Bulletin 32: Guidelines for Evaluating and Nominating Properties Associated with Significant Persons*, and 36 CFR 63. We respectfully request your review, and hope for your concurrence.

As BPA needs to resume construction soon, your prompt response would be most appreciated. If you have any questions or if there is anything we can do to facilitate your review, please do not hesitate to contact Kevin Cannell at (503) 230-4454 ([kgcannell@bpa.gov](mailto:kgcannell@bpa.gov)).

Sincerely,



F. Lorraine Bodi  
Vice President for Environment, Fish and Wildlife

Enclosures:

- 1-NPS Cultural Landscape Inventory
- 2-Sk'in Village Cultural District 10-900 form
- 3-BPA determination of not eligible letter; June 20, 2013
- 4-Washington DAHP do not concur letter; June 27, 2013
- 5-Yakama Nation do not concur letter; July 1, 2013
- 6-U.S. Forest Service, Columbia Gorge National Scenic Area concurrence letter; July 2, 2013
- 7-NPS do not concur letter; July 9, 2013
- 8-Oregon SHPO concurrence letter; July 12, 2013
- 9-Yakama Nation additional comments letter, July 31, 2013
- 10- BPA Notes regarding *Cultural Landscape Inventory of the Lewis and Clark portage route and campsite at Celilo Falls, Klickitat County, Washington*

cc:

Allyson Brooks, Washington DAHP  
Robert Whitlam, Washington DAHP  
Dennis Griffin, Oregon SHPO  
Ian Johnson, Oregon SHPO  
Mark Weekley, NPS  
Gail Gladstone, NPS  
Tom McCulloch, ACHP  
Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation  
Marge Dryden, USFS Columbia Gorge National Scenic Area  
Shawn Steinmetz, Confederated Tribes of the Umatilla Indian Reservation  
Keith "Patrick" Baird, Nez Perce Tribe  
Sally Bird, Confederated Tribes of the Warm Springs Reservation  
Gail Celmer, Army Corps of Engineers  
Amy Holmes, Army Corps of Engineers



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

November 13, 2012

In reply refer to: KEC-4

Dr. Allyson Brooks  
Department of Archaeology and Historic Preservation  
1063 S. Capitol Way, Suite 106  
Olympia, WA 98501

Re: Big Eddy-Knight determination regarding Sk'in Village Cultural District

Dear Dr. Brooks;

Enclosed please find the archaeological survey report prepared by Historical Research Associates for the access roads and ROW on the Washington side of the Columbia River crossing. Please note that one access road, a conductor stringing location, and the guard structure adjacent to the railroad have not yet been surveyed but will be soon. Also enclosed is a completed NPS10-900 form for BPA's determination of eligibility for the Sk'in Village Cultural District, which is comprised of two nearly coterminous sites, site 45KL77 and the Sk'in Village site as well as a cultural landscape study of the area completed by the National Park Service. We have determined the District is eligible under all four National Register criteria. As requested by Dr. Whitlam, we have included the names, addresses, and telephone numbers of the landowners within the proposed District in an attachment. We have not included the names and addresses in the 10-900 form because the form is not being used for a nomination, and because the form is being used to consult with all the parties regarding this determination, and we are not authorized to release the private personal information to others.

BPA's determination is based on the 2012 traditional cultural properties assessment prepared by the Yakama Nation for the Washington river crossing of the Big Eddy – Knight Project (Project) (Lally and Oliver 2012), as well as an archaeological survey report for site 45KL77 prepared by Historical Research Associates (Falkner and Ahlman 2012), and a cultural landscape inventory for Celilo Falls prepared by the National Park Service (NPS 2012) in relation to the Lewis & Clark Trail. Each of these assessments represent supplemental information prepared for this area for the Project, as both a traditional cultural properties assessment and archaeological survey reports were prepared for the area prior to implementation of the Project (Adams et al. 2010; Ahlman et al. 2011; Vaughn et al. 2011).

In the programmatic agreement for the Project, BPA determined that site 45KL77 was eligible for inclusion in the National Register of Historic Places. At that time, the site boundary encompassed approximately 10 acres (Churchill 2004). The site boundary was subsequently expanded, however, with work by the Yakama Nation including a revised State of Washington Archaeological Site Inventory Form submitted to DAHP in February of 2012.

The proposed Sk'in Village Cultural district is approximately 320 acres. In evaluating the property's eligibility under the National Register criteria, BPA acknowledges that the Yakama Nation possesses special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to the tribe (see 36 CFR 800.4(c)(1)).

We look forward to your review and concurrence on the determination. Once concurrence is received, BPA will continue its consultation with the parties on measures to avoid, minimize, and mitigate the effects of the undertaking on the Sk'in Village Cultural District. If you have any questions please contact BPA Archaeologist Kevin Cannell at (503) 230-4454 or [kgcannell@bpa.gov](mailto:kgcannell@bpa.gov).

Thank you for your input and continued assistance.

Sincerely,

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Lydia T. Grimm  
Manager, Environmental Planning and Analysis

Enclosure: 10-900 form  
Archaeological Survey Report  
National Park Service Cultural Landscape Study

References:

- Adams, J., G. Cauffman, R. Corpuz, G. Kiona, J. Meninick, and J. Meninick  
2010 *Traditional Cultural Properties of the Big Eddy to Knight Transmission Line Alternatives*. Confederated Tribes and Bands Yakama Nation, Cultural Resources Program, Toppenish, Washington.
- Falkner, M. and T. Ahlman  
2012 *Archaeological Tasks Associated with the River Crossing (Washington side) for the Big Eddy-Knight Transmission Project, Klickitat County, Washington*. Historical Research Associates, Seattle, Washington.
- Ahlman, T., S. Tarman, and M. Falkner  
2011 *Cultural Resources Field Survey Associated with the Big Eddy-Knight Transmission Project Phase I, Klickitat County, Washington*. Historical Research Associates, Missoula, Montana.
- Cannell, K. and E. Oliver  
2010 *A Cultural Resources Survey for Geotechnical Testing at the Proposed East Columbia River of the Big Eddy-Knight Transmission Line*. Bonneville Power Administration, Portland, Oregon.
- Churchill, T.  
2004 Site form for 45KL77 (Celilo Bridge). Copy on file at Washington Department of Archaeology and Historic Preservation, Olympia, Washington.
- Lally, J. and N. Oliver  
2012 *Traditional Cultural Property Study of Sk'in Village*. The Confederated Tribes and Bands of the Yakama Nation, Cultural Resources Program, Toppenish, Washington.
- National Park Service  
2012 Celilo Falls: Lewis and Clark Campsite and Portage Route, Cultural Landscape Inventory. Document prepared by Lewis and Clark National Historic Trail, Omaha, Nebraska.

Parker, P.L. and T.F. King

1998 *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*. U.S. Department of the Interior, National Park Service, Washington.

Vaughn, K., S. Scott, and G. Cauffman

2011 *Cultural Resource Inventory and Archaeological Testing of the Big Eddy-Knight Transmission Line Project in Klickitat County, Washington*. Central Washington Anthropological Survey, Central Washington University, Ellensburg, Washington.

Yakama Nation Cultural Resources Program

2012 45KL77 site form (Celilo Bridge Site). Copy on file at Washington Department of Archaeology and Historic Preservation, Olympia, Washington.



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

SECURITY AND CONTINUITY OF OPERATIONS

October 31, 2013

In reply refer to: NN-1

Richard Till  
Friends of the Columbia Gorge  
522 SW 5th Ave, Ste 720  
Portland, OR 97204

### FOIA BPA-2013-01584-F

Dear Mr. Till:

This is a partial response to your request for records that you made to the Bonneville Power Administration (BPA), under the Freedom of Information Act (FOIA), 5 U.S.C. 552.

**You requested the following:**

“Two documents; the determination of eligibility and effect, and the determination of eligibility that was provided to the keeper of the National Register.”

**Response:**

On October 8, 2013, BPA provided a letter dated August 5, 2013, to the National Parks Service. That letter had a number of enclosures that are listed here:

- 1-NPS Cultural Landscape Inventory
- 2-Sk'in Village Cultural District 10-900 form
- 3-BPA determination of not eligible letter; June 20, 2013
- 4-Washington DAHP do not concur letter; June 27, 2013
- 5-Yakama Nation do not concur letter; July 1, 2013
- 6-U.S. Forest Service, Columbia Gorge National Scenic Area concurrence letter; July 2, 2013
- 7-NPS do not concur letter; July 9, 2013
- 8-Oregon SHPO concurrence letter; July 12, 2013
- 9-Yakama Nation additional comments letter, July 31, 2013
- 10-BPA Notes regarding *Cultural Landscape Inventory of the Lewis and Clark portage route and campsite at Celilo Falls, Klickitat County, Washington*

BPA is providing the following documents from that list in their entirety:

- 3-BPA determination of not eligible letter; June 20, 2013
- 4-Washington DAHP do not concur letter; June 27,2013
- 6-U.S. Forest Service, Columbia Gorge National Scenic Area concurrence letter; July 2, 2013
- 7-NPS do not concur letter; July 9, 2013
- 8-Oregon SHPO concurrence letter; July 12, 2013

BPA is withholding certain information in the document entitled “1-NPS Cultural Landscape Inventory” pursuant to Exemption 3 of the FOIA. Exemption 3 upholds the withholding of information that is protected from release by another statute, for example, the National Historic Preservation Act of 1966, Section 304.

Under the National Historic Preservation Act of 1966, Section 304, we obtain the authority to withhold from disclosure information about the location, character, or ownership of a historic resource if disclosure would cause a significant invasion of privacy; risk harm to the historic resource; or impede the use of a traditional religious site by practitioners.

BPA is still reviewing the document entitled “10 - BPA Notes regarding *Cultural Landscape Inventory of the Lewis and Clark portage route and campsite at Celilo Falls, Klickitat County, Washington,*” for Exemption 5 material.

Also, two letters submitted by the Yakama Nation are still undergoing Exemption 3 & 4 review. We anticipate completing that review no later than Tuesday, November 5, 2013.

Please contact Kim Winn, FOIA Specialist, at 503-230-5273 with any questions about this letter.

Sincerely,

*/s/Christina J. Munro*  
Christina J. Munro  
Freedom of Information/Privacy Act Officer

Enclosures



**4. National Park Service Certification**

I hereby certify that this property is:

entered in the National Register

determined eligible for the National Register

determined not eligible for the National Register

removed from the National Register

other (explain: \_\_\_\_\_)

Signature of the Keeper \_\_\_\_\_

Date of Action \_\_\_\_\_

**5. Classification**

**Ownership of Property**

(Check as many boxes as apply.)

- private
- public - Local
- public - State
- public - Federal

**Category of Property**

(Check only **one** box.)

- building(s)
- district
- site
- structure
- object

**Number of Resources within Property**

(Do not include previously listed resources in the count.)

Contributing	Noncontributing	
		buildings
2		sites
		structures
		objects
2		<b>Total</b>

**Name of related multiple property listing**

(Enter "N/A" if property is not part of a multiple property listing)

N/A

**Number of contributing resources previously listed in the National Register**

None

**6. Function or Use**

**Historic Functions**

(Enter categories from instructions.)

DOMESTIC/village site

RELIGION/ceremonial site

FUNERARY/graves/burials

RECREATION AND CULTURE/work of art

**Current Functions**

(Enter categories from instructions.)

AGRICULTURE/SUBSISTENCE/agricultural field

GOVERNMENT/public works

**7. Description**

**Architectural Classification**

(Enter categories from instructions.)

NA

**Materials**

(Enter categories from instructions.)

foundation: NA

walls: \_\_\_\_\_

roof: \_\_\_\_\_

other: \_\_\_\_\_

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**Narrative Description**

(Describe the historic and current physical appearance of the property. Explain contributing and noncontributing resources if necessary. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, setting, size, and significant features.)

**Summary Paragraph**

The Sk'in Village Cultural District (District) consists of two properties that include the Sk'in Village traditional cultural property (TCP) as well as archaeological site 45KL77. Elements comprising site 45KL77 and the Sk'in Village TCP are often interrelated. However, there are some elements of the TCP that are not shared with the archaeological site. Thus the two properties are described here together because of the integrated nature of their historic characteristics, and because those characteristics are considered integral by the affected tribe, the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).

The District is located along the Columbia River approximately five miles west of the Deschutes River confluence, four miles southwest of Haystack Butte, and two miles east of Browns Island. The District is located just to the north of Celilo Falls in the Columbia River which was used by area tribes from time immemorial as a major fishing, trading, and meeting site until the Falls were inundated by the construction of The Dalles Dam and creation of Lake Celilo in 1957. The inundation of the Falls also flooded the physical site of the historic Sk'in Village, located on the sandy banks of the river (National Park Service 2012:19).

The District encompasses approximately 320 acres and is situated along the northern shoreline of Lake Celilo and extends north into rock outcrops, basalt columns, flats, mesas, and semi-stabilized dunes. Vegetation onsite and in the vicinity is typical of the shrub-steppe environment inherent to the region, and includes sagebrush, Sandberg's bluegrass, rabbitbrush, fescue, blue grass, bunch grasses, biscuit root, lupine, tumble mustard, cheatgrass, poplar, willow, rye grass, Himalayan blackberry, alfalfa, poison oak, and thistle. The ground-slope in the area ranges from 0° to 50°. The property is primarily privately owned, including several individual landowners, and is utilized for pasture land; the BNSF railroad is located just inside the southern boundary of the District, and there are also individual Indian allotments held in trust by the Bureau of Indian Affairs within the western portion of the District. The Bonneville Power Administration has an easement and existing transmission line bisecting the District in the eastern part. The District is located within the Columbia River Gorge National Scenic Area managed by the USDA Forest Service.

[

Ex 3

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**Narrative Description**

The majority of the following narrative is taken directly from "Traditional Cultural Property Study of Sk'in Village" (Lally and Oliver 2012); from "Celilo Falls: Lewis and Clark Campsite and Portage Route, Cultural Landscape Inventory" (National Park Service 2012); and from the Washington DAHP archaeological site form for 45KL77 as prepared by personnel from the Yakama Nation Cultural Resource Program (YN CRP 2012). The environmental information is from Falkner and Ahlman (2012).

**I. Sk'in Village Traditional Cultural Property****a. Environmental setting:**

The District is located in an ecological and climatic transition zone between the maritime air patterns from the west and the drier continental air patterns of eastern Washington. These differences are created in part by the Cascade Mountain

Range, which forms a barrier to precipitation-bearing air masses and creates a cool rain shadow effect for the western part of the county (Franklin and Dyrness 1973; Jackson 1985). The climate in the Southern Washington Cascades is difficult to generalize, particularly in proximity to the Columbia Gorge which is greatly affected by marine air masses, but in general rainfall on the western slopes is heavy, snowfall in the winter is moderate to heavy, and warm dry summers are the norm (Jackson 1985). This area is characterized by basalt spires, sheer cliffs and towering butte formations (National Park Service 2012). The climate of the area is a dry interior steppe with annual precipitation of 8 to 12 inches per year. Vegetation is also in transition here between the drier vegetation of the plateau to the western red cedar and Douglas fir communities as one enters the foothills of the Cascade Mountains. The area is known for the winds that funnel through the gorge up from the costal low pressure systems. (NPS 2012)

Plant communities in the shrub-steppe regions of Washington and Oregon include varieties of bunchgrasses, shrubs, and herbs (Chatters 1998). The bunchgrasses are wheatgrass and pinegrass (*Agropyron spicatum*), Siskiyou blue (*Fustuca idahoensis*), and Sandberg bluegrass (*Poa sandbergi*). Sagebrushes include big sagebrush (*Artemisia tridentata*), little or low sagebrush (*A. arbuscula*), and stiff sagebrush (*A. rigida*). Big sagebrush is found in deep soils, low sagebrush in shallow or stony soils, and stiff sagebrush in lithosols or very shallow soils (Franklin and Dyrness 1973). *Pinus ponderosa* forests mix with shrub-steppe and steppe communities (Franklin and Dyrness 1973:183). As a result, a variety of fauna can be found in the project area.

Historically, the Columbia River, and in particular Celilo Falls, provided extensive fishing opportunities particularly for salmon species. Mountain bison were found between the Columbia Basin and the Blue-Ochoco Mountains to the south. Other supported large animal communities include elk and mule deer. Important game species are sage grouse, sharp-tailed grouse, and California quail. Small mammals that reside in the area, both historically and in modern times, include beaver, fox, several species of rabbits, squirrels, and badgers. Predator species included cougar, bobcat, and coyote.

b. Historic Period

[

Ex 3

]

Relative to the Lewis and Clark Expedition, the National Park Service (2012) indicates that on October 22, 1805, the Corps of Discovery was forced to portage around Celilo Falls, and based on historical topography (pre-inundation) and existing intact topography, the National Park Service believes that Captain William Clark [ Ex 3 ] to map the Falls and the portage route (National Park Service 2012: 12-13).

c. Affected community

The mid-Columbia River Gorge has been traditionally used by the ancestors of many cultural groups, including the ancestors of the Yakama people. Members of these groups used the Columbia River and its tributaries as year-round residential and/or resource utilization areas, while upland and inland areas were utilized on a more seasonal basis. Botanical resources, such as lomatium and bitterroot, were gathered in the spring. These resources were dried and brought to the winter camps in the lowlands to be stored in semi-subterranean storage pits. The use of the uplands in the spring was followed by a period of fishing along the Columbia, Klickitat, and White Salmon rivers, interspersed with periods of berry gathering in the nearby uplands. In the late summer and early fall, people gathered huckleberries and hunted elk and deer near Mount Adams. In the late fall and early winter, people returned to their winter village sites (Churchill and Griffin 2001; Wilson et al. 2005).

The Five Mile Rapids and Celilo Falls were an important fishery for the people that inhabited the area. Fishing, particularly salmon, provided one of the principal food sources for the region. As annual spawning runs of salmon were predictable, fishing was central to the seasonal round of subsistence activities. The first salmon reached the interior Plateau in late February or early March. In June, the large annual salmon run would occur, and the families would reconvene at the fisheries.

As further discussed in the significance section below, [ Ex 3 ]

## d. Physical characteristics

The primary physical characteristics associated with the District are the Columbia River at the southern boundary, the basalt cliffs near the southern boundary including the cave/crevasse below the transmission tower location, and various basalt landforms (many comprising monumental sites) throughout. The shrub-steppe habitat predominates, and use of the area as pasture land is evident (cows, cow trails, fencing, gates, etc).

## e. Likely appearance of the district and the time it achieved significance:

With the exception of the impacts noted below, most notably the existing transmission line that bisects it the District particularly in the areas above the basalt cliffs has remained largely undeveloped and retains its essential historic characteristics.



View of Washington side of Columbia River taken from Oregon side showing the existing condition of the landform at a broad scale (Cannell 2010).

## f. Current and past impacts.

Past impacts include:

- The construction of the railroad and railway bridge in the early 1900s, which included excavation of some of the basalt columns in the area, and the removal of *Coyote's Cradleboard* from the District (Lally and Oliver 2012:30).
- The inundation of Celilo Falls and the historic Sk'in Village area by the construction of The Dalles Dam by the United States (Army Corps of Engineers) in 1957.
- The construction of the transmission line in the District by the United States (Bonneville Power Administration) in the 1950s.
- Vandalism

Current impacts include:

- Operation of the railroad (noise, vibration)
- Operation and maintenance of the existing BPA transmission line (visual intrusion, vehicle access for maintenance)
- Construction of the new BPA transmission line (larger towers, new and improved access roads)
- Erosion due to road use and ranching.
- Off-road use near the cave below the cliffs.

g. Ex 3

See the description of site 45KL77, below.

h. Previous investigations (relative to traditional cultural values):

Kiona, G. & Scott, S.

2008 *Cultural Resource Monitoring on the Washington Shore of the Dalles Pool, A Project Completed by the Confederated Tribes and Bands of the Yakama Nation*. Prepared for members of the Wanna Pa Koot Koot Working Group. Funded by the Army Corps of Engineers and the Bonneville Power Administration for the FCRPS Cultural Resources Program. COE Contract Number W9127N-04-C-0014.

Cauffman, G., Adams, J., Corpuz, R., Kiona, G., Meninick, J. & Meninick, J.

(n.d. Submitted to BPA in 2010) *Traditional Cultural Properties of the Big Eddy to Knight Transmission Line Alternatives*. Prepared for the Bonneville Power Administration Contract No. 45288.

II. Site 45KL77

a. Environmental setting:

See description above for the Sk'in Village Cultural District

b. Physical characteristics:

Site 45KL77 is best described as a site complex and was originally recorded by McClure (1978) who notes that the site contained Ex 3. He indicated that the Ex 3

Ex 3 The site was expanded in 1990 by an unknown author to include an additional 600 feet west of a cave/crevasse situated underneath a transmission power line. During revisit and update in 1990 it was documented that the talus slope near the Ex 3 had been extensively looted. This was evident by numerous potholes and off-road vehicle tracks. The cave/crevasse had been vandalized by scratching marks and white chalk. Ex 3

Churchill visited the site location in 1994 and observed an

In 2004 the site was revisited by Churchill (2006) as part of a cultural resources survey following a train derailment in the area.

Ex 3

As a result of Churchill's (2006) fieldwork the site boundary was expanded to approximately 100 meters by 500 meters in size.

On February 7th 2012 Yakama Nation Cultural Resources Program (YN CRP) visited site 45KL77 and the surrounding vicinity. While at the site location, YN CRP personnel attempted to identify the surface extent of the site boundary. The site was observed to be much larger than previously defined. The site was only briefly surveyed during the visit and due to time constraints could not be fully surveyed to the north and east. On February 17th 2012, the YN CRP made a second visit to the site for partial fulfillment of Cultural Resource Monitoring on the Washington Shore of The Dalles and Bonneville Pools, 2012 for the U.S. Army Corps of Engineers Portland District. Subsequent visits were conducted by YN CRP on February 23rd and again on March 13th with Bonneville Power Administration (BPA) representatives in regards to the proposed Big Eddy-Knight Transmission Line.

YN CRP has updated the site to reflect the Ex 3 interconnected to 45KL77 representing

Ex 3

boundary of 45KL77 is likely larger than the known

Ex 3

The actual site boundary encompasses

YN CRP has expanded the  
YN CRP observed

Ex 3  
Ex 3

YN CRP observed Ex 3 as well as a cave/crevasse that had been previously identified in Churchill's 2006 site inventory form and report. Examination of the DAHP site boundary as well as the

Churchill 2006 location map revealed that the actual location of the Ex 3 was outside of the existing site boundary (see Figure 4). Ex 3 locations were updated to reflect their actual location.

During the 2012 visit, disturbances to the site were documented. These disturbances include areas of blasting, mining locales, graffiti on basalt cliff walls, off road vehicle use, the existing BPA transmission line, existing BPA access road, excavated site materials, and disturbance mounds. One area of excavated site materials is within a

Following their survey of site 45KL77 the YN CRP expanded the site boundary to include Ex 3. The original site area of site 45KL77 was encompassed within the newly expanded site. The following is a brief description of the Ex 3 recorded at each of these previously recorded contributing elements that are now Site 45KL77, as provided by the YN CRP as provided in the 2012 site form:

45KL460: McClure (1989) recorded a [

Ex 3

] Churchill and Griffin (2000) survey only covered the private lands portion of the site. They did not observe any Ex 3 but did note the area had been covered by windblown sand. The historic component of the site, which covered both federal and private lands, was relocated by Churchill and Griffin (2000).

45KL461: McClure (1989) recorded a [

Ex 3

] Churchill and Griffin (2000) recorded a [

Ex 3

] (aka 45KL730).

This area lies within a [

Ex 3

] Churchill and Darby (2004) conducted subsurface testing of the site revealing a much larger site than previously recorded and encompassing other [

Ex 3

45KL462: King and Green (1989) recorded a [

Ex 3

] Churchill and Griffin (2000) recorded

Ex 3

. No lithics were visible during this survey; however, the area was heavily impacted by windblown sediments. The base of the basalt butte was identified as a Ex 3 Churchill (2004) recorded a total of [

Ex 3

45KL469: Woodward (1982) documents [

Ex 3

] Landreau and Kiona (1999) relocated the latter Ex 3 but not the former. They further noted the talus slope area was a Ex 3 Churchill (2004) relocated Ex 3. The only [ Ex 3 In addition to

Ex 3

45KL470: Witte (1990) recorded [

Ex 3

Additional Ex 3 To the east, a recent feature consisting of the initials J.L. was recorded. Landreau and Kiona (1999) relocated the Ex 3 Bettis and Roe (2004) identified the Ex 3 recorded in the 1990 and 1999 visit. Additionally, [

Ex 3

45KL728: Griffin (2000) recorded Ex 3 (Churchill and Roe (2004) Subsurface testing revealed 45KL728 was continuous with 45KL461 and was subsequently combined into 45KL461.

45KL729: Churchill (2000) recorded a the base of basalt outcropping on a dune blow out. [ Ex 3 ] were also observed. ] Honey colored glass fragments and a pop can pull top were observed as well.

45KL731: Churchill and Griffin (2000) recorded Ex 3 on a sandy hill slope. [ Ex 3 ]

45KL732: Churchill and Griffin (2000) recorded a Ex 3 on a bench/terrace exposed within a cattle trail. Churchill (2003) recorded a Ex 3 on an upper river terrace. Ex 3 was recorded just south of 45KL732 and was designated Ex 3 45KL977. Churchill and Darby (2003) identified [ Ex 3 ]

45KL733: Churchill and Griffin (2000) recorded a [ Ex 3 ] is within the larger site 45KL461.

45KL734: Churchill and Griffin (2000) recorded a [ Ex 3 ]

45KL735: Griffin (2000) recorded a [ Ex 3 ]

45KL736: Griffin (2000) recorded Ex 3 butte. [ Ex 3 ] situated on a basalt

45KL859: Churchill and Griffin (2000) recorded a Ex 3 on a terrace slope.

45KL860: Churchill and Griffin (2000) documented a [ Ex 3 ]

45KL961: Rogers (2003) recorded a Ex 3 on an upper river terrace east of an unnamed creek. [ Ex 3 ]

45KL962: Bettis and Rogers (2003) recorded [ Ex 3 ]

45KL963: Churchill (2003) recorded [ Ex 3 ]

]

Ex 3

45KL964: Churchill (2003) documented

Ex 3

45KL965: Rogers (2003) recorded a

Ex 3

45KL966: Churchill (2003) recorded a

Ex 3

45KL967: Martin (2003) recorded a

Ex 3

45KL968: Bettis (2003) recorded

Ex 3

45KL969: Bettis (2003) recorded

Ex 3

45KL970: Bettis (2003) recorded

Ex 3

45KL971: Churchill (2003) recorded

Ex 3

45KL972: Churchill (2003) recorded a

Ex 3

45KL973: Churchill (2003) recorded a

Ex 3

45KL974: Martin (2003) recorded a [

Ex 3

] is within the larger site 45KL461.

45KL975: Churchill (2003) recorded a dune area on an upper river terrace.

Ex 3

on the edge of a

45KL976: Martin (2003) recorded a [

Ex 3

] Churchill and Darby (2004) recorded [

Ex 3

] Subsurface testing at

45KL461 revealed [

Ex 3

]

45KL978: Churchill (2003) recorded

Ex 3

situated on an upper river terrace.

45KL1026: Roe et al (2004) recorded [

Ex 3

] Another Ex 3

meters east of this area, is another locale of [ Ex 3 ]  
] Twelve meters east of this area, is another locale of [ Ex 3 ]  
] meters east of the previous area.

45KL1027: Churchill (2004) recorded a Ex 3 on a steep talus slope.

45KL1028: Roe et al (2004) recorded Ex 3

45KL1029: Churchill (2004) recorded a Ex 3

45KL1030: Darby and Churchill (2004) recorded a Ex 3

45KL1031: Churchill et al (2004) recorded a Ex 3

45KL1032: Darby (2004) recorded a Ex 3

45KL1033: Rogers (2004) recorded a Ex 3  
at the bottom and along the west facing slopes of an unnamed drainage.

45KL1034: Darby (2004) recorded a Ex 3

45KL1035: Churchill (2004) recorded Ex 3 situated on a flat basalt terrace adjacent to small  
basalt outcrop. [ Ex 3 ]

45KL1036: Rogers (2004) recorded a Ex 3

45KL1037: Rogers (2004) recorded a [ Ex 3 ]

] Approximately 20 to 30 feet north of [ Ex 3 ]

45KL1038: Churchill (2004) recorded on a south facing  
terrace.

45KL1039: Rogers (2004) recorded a Ex 3 within an intermittent drainage.

45KL1040: Darby (2004) recorded Ex 3 situated on a  
small bench at the base of a basalt rock outcrop east and above an intermittent drainage.

45KL1041: Rogers and Bettis (2004) recorded [ Ex 3 ]

] Fractures in the rock also appear [ Ex 3 ]

45KL1042: Darby (2004) recorded a Ex 3 along the slopes of an upper river terrace overlooking the  
Columbia River.

45KL1043: Churchill (2004) recorded a Ex 3 at the base of a basalt outcrop on the edge of a  
dune area overlooking an unnamed drainage.

45KL1044: Churchill (2004) recorded	Ex 3	
45KL1045: Churchill and Bettis (2004) recorded	Ex 3	
45KL1046: Churchill (2004) recorded	Ex 3	
45KL1047: Churchill (2004) recorded	Ex 3	
45KL1048: Churchill (2004) recorded a	Ex 3	along a south facing sandy slope at the base of a basalt terrace cliff.
[	Ex 3	
]	Ex 3	
45KL1049: Churchill (2004) recorded	Ex 3	
45KL1050: Darby (2004) recorded a	Ex 3	
45KL1051: Churchill (2004) recorded a	Ex 3	situated on a steep talus slope.
45KL1052: Bettis (2004) recorded	Ex 3	
45KL1053: Schauer (2004) recorded a	Ex 3	
45KL1054: Churchill (2004) recorded a	Ex 3	
45KL1055: Bettis (2005) recorded	Ex 3	
45KL1056: Churchill (2004) recorded a	Ex 3	
45KL1057: Churchill (2004) recorded a	Ex 3	
45KL1058: Darby (2004) recorded a	Ex 3	situated along a gentle sloped north facing sand dune[
	Ex 3	
		]
45KL1059: Churchill (2004) recorded a	Ex 3	
45KL1060: Churchill (2004) recorded a	Ex 3	

45KL1061: Churchill (2004) recorded Ex 3

45KL1062: Churchill (2004) recorded Ex 3 on a basalt "mesa" top and sandy terrace immediately east of two sand dune blow out areas.

45KL1063: Churchill (2004) recorded Ex 3

45KL1064: Churchill (2004) recorded a Ex 3 in an intermittent drainage on an upland terrace that has been covered with sand dunes.

45KL1065: Churchill (2004) recorded Ex 3

45KL1066: Churchill (2004) recorded a Ex 3

45KL1067: Churchill (2004) recorded a Ex 3

45KL1196: Keyser and Ripps (2007) recorded Ex 3 on an erratic basalt boulder. [ Ex 3

]

45KL1194: Keyser (2007) recorded Ex 3

45KL1195: Keyser and Ripps (2007) documented Ex 3

45KL1197: Keyser and Ripps (2007) documented Ex 3

45KL1198: Keyser and Ripps (2007) recorded [ Ex 3

and Ripps (2007) indicate the site is probably closely related to 45KL77. ] Keyser

45KL1653: Churchill (2009) recorded a Ex 3 on an open stretch of sand dunes situated along the side slopes and top of a terrace. [ Ex 3 ]

45KL1982: Pitts and Steinkraus (2011) recorded a Ex 3

The YN CRP made several visits to 45KL77 in early 2012 to determine the archaeological site boundary. [ ]

Ex 3

]

[

Ex 3

]

Feature 1: [

Feature 2:

Feature 3:

Feature 4:

Feature 5:

Feature 6:

Ex 3

Feature 7:

Feature 8:

Feature 9:

Feature 10:

Feature 11:

]

**Limited investigation of 45KL77 by Historical Research Associates Inc, (HRA) in June and July 2012**

HRA conducted limited survey of site 45KL77 in late June 2012. Of the approximately 320 acres that now constitute the recently drawn boundaries, HRA was limited to approximately 19 acres within BPA's right of way. HRA personnel identified a total of [

Ex 3

]

Sk'in Village Cultural District  
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**8. Statement of Significance**

**Applicable National Register Criteria**

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B Property is associated with the lives of persons significant in our past.
- C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D Property has yielded, or is likely to yield, information important in prehistory or history.

**Criteria Considerations**

(Mark "x" in all the boxes that apply.)

Property is:

- A Owned by a religious institution or used for religious purposes.
- B removed from its original location.
- C a birthplace or grave.
- D a cemetery.
- E a reconstructed building, object, or structure.
- F a commemorative property.
- G less than 50 years old or achieving significance within the past 50 years.

**Areas of Significance**

(Enter categories from instructions.)

ETHNIC HERITAGE/NATIVE AMERICAN

EXPLORATION/SETTLEMENT/Lewis & Clark Expedition

RELIGION

SOCIAL HISTORY

ARCHEOLOGY/PREHISTORIC/HISTORIC-ABORIGINAL

ART

**Period of Significance**

Prehistoric, historic (1800s to early 1900s);  
modern times (1957-present day)

**Significant Dates**

NA

**Significant Person**

(Complete only if Criterion B is marked above.)

Ex 3

**Cultural Affiliation**

Prehistory: Archaic-Late Archaic; Mid-Columbia  
Native American groups (history); Yakama Nation  
ceded territory (present day)

**Architect/Builder**

NA

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**Period of Significance (justification)**

NA

**Criteria Considerations (explanation, if necessary)**

Of the six additional "criteria considerations" that can render an otherwise eligible property ineligible, only four are potentially at issue with the proposed District: (1) use for religious purposes; (3) birthplaces and graves; (4) cemeteries; and (6) significance achieved within the past 50 years (36 CFR 60.4).

As to religious purposes, as noted in Bulletin 38, the Euro-American perspective on the separation of religion from the rest of culture is not generally applicable in Indian traditions, and so this consideration should not be used to exclude otherwise historic and culturally significant sites.

**Ex 3**

Similarly, while there are

per the guidance in Bulletin 38, these are significant contributing elements

to the property, but they are not the reason the property is in itself eligible. As a result, the

**Ex 3**

of the property and do not render the property ineligible. Lastly, while some of the

features may be less than 50 years old

**Ex 3**

, the significance of the site was

established in pre-history and history.

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**Statement of Significance Summary Paragraph** (Provide a summary paragraph that includes level of significance and applicable criteria.)

BPA has determined that the District is eligible for inclusion in the NRHP under criteria A, B, C, and D because of

**Ex 3**

BPA recommends that site 45KL77, with the expanded site boundary, be determined eligible under Criterion D, as it may provide important information on the prehistory of the region.

**Narrative Statement of Significance** (Provide at least one paragraph for each area of significance.)

**Sk'in Village Cultural District:**

The Sk'in Village District encompasses several hundred acres of a land area adjacent to the Washington side of the historic (now inundated) Celilo Falls. The Falls were long-standing fishing, meeting, and trading place utilized by area tribes for thousands of years. Reflecting this long occupation and cultural significance, the property

**Ex 3**

In evaluating the property's eligibility under the National Register criteria, BPA acknowledges that the Yakama Nation possesses special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to the tribe (see 36 CFR 800.4(c)(1)). As a result, BPA relied heavily on the assessment provided by the Yakama Nation CRP by Lally and Oliver (2012) in finding that the property is eligible due to

**Ex 3**

As described by Lally and

Oliver (2012) specific aspects of the property that help document its eligibility under the four National Register criteria follow.

***Criterion A: Association with Events That Have Made a Significant Contribution to the Broad Patterns of Our History***

There a number of events represented by or at the property that have made a contribution to our history and that of the Yakama peoples:

- 

**Ex 3**

- Links to Treaty negotiations: There were fourteen tribes or bands represented in treaty negotiations with the United States in this area. Sk'in Village is one of the signatory villages to the 1855 Treaty with the Yakamas (Lally and Oliver 2012:43), meaning the community at Sk'in Village represented one of the tribes or bands involved in the treaty negotiations, and its representative was one of the signators.
- Links to significant examples of site destruction: A legendary site within the property "Coyote's Cradleboard" was destroyed during the construction (1907-08) of the segment of the railroad that runs through the southern portion of the property. See Figure 21 of Lally and Oliver 2012 at 30. The destruction of this site was a historic event to the Yakama, marking a significant example of destruction of a key cultural resource due to economic development (*Id.*).
- Links to the Lewis and Clark Expedition in 1805-1806: Lewis and Clark likely located a campsite within or near the southwestern edge of the property in October of 1805 after portaging around Celilo Falls (NPS 2012: 5). The National Park Service indicates that Captain Clark likely

**Ex 3**

Sk'in Village Cultural District

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[ Ex 3 ] (NPS 2012: 12). The Expedition was the first documented contact for the Yakama peoples with Euro-Americans (Lally and Oliver 2012:5).

**Criterion B: Association with the Lives or Persons Significant in Our Past**

The property is associated with significant individuals in Yakama Nation history. Some of the individuals are important due to their [

Ex 3

]

Other significant individuals associated with the property include Chief Me-ni-nock, George Meninick, Tommy Thompson, and Lewis and Clark. These figures all have important roles in the history of the Yakama Nation. Chief Me-ni-nock is significant as one of the signers of the 1855 Treaty with the Yakimas and was from one of the villages surrounding Celilo Falls. George Meninick is significant due to his association with treaty fishing rights, especially in the immediate area of Celilo. Tommy Thompson is also a significant for his support of treaty fishing rights particularly regarding Celilo Falls (Lally and Oliver 2012:11-12). As noted above, Lewis and Clark spent time in the area during their expedition, particularly to record observations about the activities at Celilo Falls and to describe a portage route around the falls.

**Criterion C(3): Possession of High Artistic Values**

As noted in "Guidelines for Evaluating and Documenting Traditional Cultural Properties," National Register Bulletin 38 (Parker and King 1998:13) "[a] property made up of or containing art work valued by a group for traditional cultural reasons, for example a petroglyph or pictograph site venerated by an Indian group may be viewed as having high artistic value from the standpoint of the group" and thereby meet the criterion for National Register eligibility. [

Ex 3

]

**Criterion D: History of Yielding, or Potential to Yield, Information Important in Prehistory or History**

The Yakama Nation indicates that the property has the potential to yield information important to the Yakama Nation's history through additional ethnographic studies and elder interviews (Lally and Oliver 2012: 43). BPA believes that the multiple types of resources in the area and the linkage with the Lewis and Clark Expedition may also yield information important to our history.

**Site 45KL77**

Site 45KL77 is a

Ex 3

Ex 3 The eastern half of the site, where the current Project bisects the site, appears to have a . The YN CRP mapped a

Ex 3

This location was only observed from a distance during the current project as no access was granted to the area by the landowner. This locality is situated well to the west of BPA's right of way but access routes to the right of way may intersect it. The setting is an area of stable longitudinal dunes that trend, and formed, from west to east. While no artifacts have been recorded in this area, dunning sand provides a suitable setting for occupational surfaces but can also result in the burying and re-deposition of cultural materials. The basalt cliff face to the north may have provided some shelter from the elements, but the predominant wind direction is from the west. The location is also within short distance of multiple overlapping resource arrays including access to water, firewood, lithic raw materials, and high density clusters of plant and animal resources.

[

Ex 3

] Another factor appears to be the process of site formation and active geological processes in the area. The NRCS maps approximately 80 percent of the soils for Site 45KL77 as rock outcrop (NRCS 2012). The exception is small pockets of Ewall loamy sand located toward the western extent of the Site 45KL77 boundaries. Ewall soils are found on terraces and terrace escarpments and form in glacial outwash or eolian dune sand

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(NRCS 2012). The location indicated to be a **Ex 3** is currently protected by stable longitudinal dunes that are covered with well-established sagebrush, rabbit brush and grasses.

**Ex 3** The explanation for this is likely due to active soil movement within area as a whole. Where deflating soil caused by wind erosion is likely exposing artifacts at the edges of, and on, rock outcrop. Simultaneously, low-lying areas are accumulating soil and potentially covering artifacts and features. The sand dunes themselves appear stable at this time, but there is no indication as to how long they have been in place. Extensive grazing or loss of vegetation due to periodic fire episodes could easily create a scenario where the stabilized sand dunes become mobile. The landform of Site 45KL77 should be considered active, and therefore the

Site 45KL77 is considered to be a

**Ex 3**

Furthermore, Site

45KL77 has the potential for **Ex 3** and appears to retain integrity of location, design, setting, feeling, and association.

Several components of this site (previously recorded 45KL469 and 45KL470) and 45KL77 have already been recommended eligible to the National Register of Historic Places. The original site 45KL77 was previously recommended eligible under Bulletin 38 as a unique ceremonial and religious cultural place (Kiona and Landreau, 1999). Under this site investigation, 45KL77 is recommended eligible to the National Register of Historic Places under Criterion D.

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**Developmental history/additional historic context information** (if appropriate)

NA

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- 2000 *State of Washington Archaeological Site Form 45KL462*. On file State of Washington DAHP, Olympia, WA.
- 2000 *State of Washington Archaeological Site Form 45KL731*. On file State of Washington DAHP, Olympia, WA.
- 2000 *State of Washington Archaeological Site Form 45KL732*. On file State of Washington DAHP, Olympia, WA.
- 2000 *State of Washington Archaeological Site Form 45KL733*. On file State of Washington DAHP, Olympia, WA.
- 2000 *State of Washington Archaeological Site Form 45KL734*. On file State of Washington DAHP, Olympia, WA.

Sk'in Village Cultural District

Klickitat County, WA

Name of Property

County and State

- 2001 *Goldendale Energy Project Summary of Results of A Traditional Cultural Property Study of A Proposed Natural Gas Pipeline, Goldendale, Washington.* Prepared for URS Corporation, Seattle by Archaeological Frontiers, Portland. On file at the DAHP, Olympia.
- Darby, M.  
2004 *State of Washington Archaeological Site Form 45KL1034.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1040.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1042.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1050.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1058.* On file State of Washington DAHP, Olympia, WA.
- Darby, M. and T. Churchill  
2004 *State of Washington Archaeological Site Form 45KL1030.* On file State of Washington DAHP, Olympia, WA.
- Darby, M., T. Churchill, and M. Roe  
2004 *State of Washington Archaeological Site Form 45KL1029.* On file State of Washington DAHP, Olympia, WA.
- Darby, M., T. Churchill, M. Roe, and G. Bettis  
2004 *State of Washington Archaeological Site Form 45KL469.* On file State of Washington DAHP, Olympia, WA.
- Falkner, Michael D. and Todd M. Ahlman  
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- Franklin, Jerry F., and C. T. Dyrness  
1973 *Natural Vegetation of Oregon and Washington.* USDA Forest Service, General Technical Report PNW-8.
- Griffin, Dennis  
2000 *Cultural Resource Investigation of Vancouver Allotment #159 Klickitat County, Washington.* Prepared for Pacific Northwest Aggregates, Inc. Seattle, Washington. On file State of Washington DAHP, Olympia, WA.  
2000 *State of Washington Archaeological Site Form 45KL735.* On file State of Washington DAHP, Olympia, WA.  
2000 *State of Washington Archaeological Site Form 45KL736.* On file State of Washington DAHP, Olympia, WA.
- Hallock, Lisa., Ryan Haugo, and Rex Crawford.  
2007 *Conservation Strategy for Washington State Inland Sand Dunes.* Prepared for Bureau of Land Management, Spokane, WA. Washington State Department of Natural Resources, Natural Heritage Report 2007-05
- Jackson, P.L.  
1985 Climate. In *Atlas of the Pacific Northwest, Seventh Edition*, edited by A.J. Kimerling and P.L. Jackson, pp.48-57. Oregon State Press, Corvallis, Oregon.
- Keyser, J.  
2004 *State of Washington Archaeological Site Form 45KL1194.* On file State of Washington DAHP, Olympia, WA.
- Keyser, J. and Lisa Ripps  
2007 *State of Washington Archaeological Site Form 45KL1195.* On file State of Washington DAHP, Olympia, WA.  
2007 *State of Washington Archaeological Site Form 45KL1196.* On file State of Washington DAHP, Olympia, WA.  
2007 *State of Washington Archaeological Site Form 45KL1197.* On file State of Washington DAHP, Olympia, WA.  
2007 *State of Washington Archaeological Site Form 45KL1198.* On file State of Washington DAHP, Olympia, WA.
- King, S. and K. Green  
1989 *State of Washington Archaeological Site Form 45KL462.* On file State of Washington DAHP, Olympia, WA.
- Kiona, Gregg and Chris Landreau  
1999 *State of Washington Archaeological Site Form 45KL77.* On file State of Washington DAHP, Olympia, WA.  
1999 *State of Washington Archaeological Site Form 45KL469.* On file State of Washington DAHP, Olympia, WA.

Sk'in Village Cultural District

Klickitat County, WA

Name of Property

County and State

Kiona, Gregg and Shane Scott

- 2006 *Cultural Resource Monitoring on the Washington Shore of the Dalles Pool. A Project Completed by the Confederated Tribes and Bands of the Yakama Nation.* Prepared for members of the Wanna Pa Koot Koot Working Group. On file YN CRP.

Lally, Jessica and Noah Oliver

- 2012 *Traditional Cultural Property Study of Sk'in Village*, Prepared for the Bonneville Power Administration, Big Eddy-Knight Transmission Line Project. On file YN CRP.

Lancaster, N.

- 1988 On desert sand seas. Episodes 11(1): 12-17. Baylor University publication.

Landreau, Christopher

- 2000 *Archeological and Cultural Resources Inventory of the Washington Shore of the Dalles Pool. A Project Completed by the Confederated Tribes and Bands of the Yakama Nation.* Prepared for the members of the Wanna Pa Koot Koot Working Group. On file YN CRP.

Martin, Daniel

- 2003 *State of Washington Archaeological Site Form 45KL967.* On file State of Washington DAHP, Olympia, WA.  
2003 *State of Washington Archaeological Site Form 45KL974.* On file State of Washington DAHP, Olympia, WA.  
2003 *State of Washington Archaeological Site Form 45KL976.* On file State of Washington DAHP, Olympia, WA.

McClure, Richard

- 1978 *State of Washington Archaeological Site Form 45KL77.* On file State of Washington DAHP, Olympia  
1978 *State of Washington Archaeological Site Form 45KL460.* On file State of Washington DAHP, Olympia, WA.  
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National Park Service

- 2012 *Celilo Falls: Lewis and Clark Campsite and Portage Route*, Cultural Landscape Inventory. Copy on file at Lewis and Clark National Historic Trail, Omaha, Nebraska.

Natural Resources Conservation Service (NRCS)

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Prouty, Guy, Sally Bird, Steve Jenevein, and Shane Scott

- 2003 *Historic Properties Management Plan for The Dalles Lock and Dam Project, A Study Conducted by the Confederated Tribes of the Warm Springs Reservation of Oregon and the Tribes and Bands of the Yakama Nation.* Prepared for the U.S. Army Corps of Engineers, Portland. District. On file YN CRP

Roe, M., T. Churchill, G. Bettis, and M. Darby

- 2004 *State of Washington Archaeological Site Form 45KL1026.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1028.* On file State of Washington DAHP, Olympia, WA.

Rogers, D.

- 2003 *State of Washington Archaeological Site Form 45KL962.* On file State of Washington DAHP, Olympia, WA.  
2003 *State of Washington Archaeological Site Form 45KL965.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1036.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1037.* On file State of Washington DAHP, Olympia, WA.  
2004 *State of Washington Archaeological Site Form 45KL1039.* On file State of Washington DAHP, Olympia, WA.

Schauer, B.

- 2004 *State of Washington Archaeological Site Form 45KL1053.* On file State of Washington DAHP, Olympia, WA.

Scott, Shane

Sk'in Village Cultural District

Klickitat County, WA

Name of Property

County and State

- 2004 *Cultural Resource Monitoring on the Washington Shore of the Dalles Pool, A Project Completed by the Confederated Tribes and Bands of the Yakama Nation.* Prepared for members of the Wanna Pa Koot Koot Working Group and the U.S. Army Corps of Engineers, Portland. On file State of Washington DAHP, Olympia
- Scott, Shane. and G. Kiona  
2008 Traditional Cultural Property Monitoring in the Lower Reaches of Nch'i-wa'na. Prepared for the U.S. Army Corps of Engineers and Bonneville Power Administration. *On file YN CRP.*
- United States Geological Survey [USGS]  
2010 Eruptive History of Mount ST. Helens.  
[http://vulcan.wr.usgs.gov/Volcanoes/MSH/Publications/PP1250/MullineauxCradell/eruptive\\_history.html](http://vulcan.wr.usgs.gov/Volcanoes/MSH/Publications/PP1250/MullineauxCradell/eruptive_history.html) Electronic document. Accessed, November 2010.
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1990 *State of Washington Archaeological Site Form 45KL77.* On file State of Washington DAHP, Olympia, WA.
- Washington Department of Natural Resources  
2011 Geology of Washington - Columbia Basin. Electronic document.  
<http://www.dnr.wa.gov/ResearchScience/Topics/GeologyofWashington/Pages/columbia.aspx>, accessed September 26, 2011.
- Wernz, Maralee, Guy, Sally Bird, and Steve Jenevein  
2005 *Historic Properties Management Plan for the Dalles Lock and Dam Project Volume I. A Study Conducted by the Confederated Tribes of the Warm Springs Reservation of Oregon with Contributions from the Confederated Tribes and Bands of the Yakama Nation.* Prepared for the U.S. Army Corps of Engineers, Portland. *On file YN CRP*
- Wilt, Julie  
1990 *State of Washington Archaeological Site Form 45KL469.* On file State of Washington DAHP, Olympia, WA.
- Wilson, Meredith, David V. Ellis, Elizabeth J. O'Brien, B. Architecture, and Terry L. Ozbun  
2005 Archaeological and Historical Resource Survey for the Windy Point Energy Project, Klickitat County, Washington. AINW Report No. 1509. Prepared for Ecology and Environmental, Inc., Portland, Oregon.

**Previous documentation on file (NPS):**

- preliminary determination of individual listing (36 CFR 67 has been requested)  
 previously listed in the National Register  
 previously determined eligible by the National Register  
 designated a National Historic Landmark  
 recorded by Historic American Buildings Survey # \_\_\_\_\_  
 recorded by Historic American Engineering Record # \_\_\_\_\_  
 recorded by Historic American Landscape Survey # \_\_\_\_\_

**Primary location of additional data:**

- State Historic Preservation Office  
 Other State agency  
 Federal agency  
 Local government  
 University  
 Other (Yakama Nation CRP)  
Name of repository: \_\_\_\_\_

Sk'in Village Cultural District  
Name of Property

Klickitat County, WA  
County and State

Historic Resources Survey Number (if assigned):

**10. Geographical Data**

**Acreage of Property** Approximately 320  
(Do not include previously listed resource acreage.)

**UTM References**  
(Place additional UTM references on a continuation sheet.)

Ex 3

**Verbal Boundary Description** (Describe the boundaries of the property.)

Ex 3

**Boundary Justification** (Explain why the boundaries were selected.)

Boundaries expanded in 2012 by YN CRP to encompass elements relating to the pre-contact occupation of the landform; concurred by Washington DAHP. Additional research regarding the Sk'in Village traditional cultural property resulted in defining a traditional cultural property in roughly the same area as archaeological site 45KL77.

**11. Form Prepared By**

name/title Ex 3 /Kevin Cannell  
organization Ex 3/BPA date Ex 3 /November 5, 2012  
street & number Ex 3 /905 NE 11<sup>th</sup> Avenue telephone Ex 3 /503-757-7859  
city or town Ex 3 /Portland state Ex 3/OR zip code Ex 3 /97232

Sk'in Village Cultural District  
Name of Property

Klickitat County, WA  
County and State

e-mail **Ex 3** /kgcannell@bpa.gov

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## 12. Additional Documentation

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Submit the following items with the completed form:

**Maps:** A **USGS map** (7.5 or 15 minute series) indicating the property's location.

A **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.

### Photographs

Representative **black and white photographs** of the property.

### Additional items

(Check with the SHPO or FPO for any additional items )

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### Photographs:

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Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map.

Name of Property: 45KL77

City or Vicinity: Wishram

County: Klickitat State: WA

Photographer: Michael Falkner

Date Photographed: June 28-29, 2012

Description of Photograph(s) and number: Included on 10-900-a

- 1 of 9 Artifact 1, basalt cobble chopper that is situated adjacent and north of the proposed structure 8/1
- 2 of 9 Artifact 2, basalt cobble chopper that is located on existing access road (650 m west of existing structure 16/1).
- 3 of 9 Artifact 3, red/yellow ccs flake manufactured by direct percussion. Pieces refit.
- 4 of 9 Artifact 4, basalt chopper near bedrock outcrop.
- 5 of 9 Artifact 5, basalt chopper near bedrock outcrop.
- 6 of 9 Artifact 6, basalt chopper near bedrock outcrop.
- 7 of 9 Artifact 7 is a basalt cobble chopper near proposed structure 9/2.
- 8 of 9 Artifact 8 is a basalt cobble chopper southwest of proposed structure 9/2.
- 9 of 9 Feature 1 Possible fallen cairn southwest of proposed structure 9/2.

Sk'in Village Cultural District  
Name of Property

Klickitat County, WA  
County and State

**Property Owner:**

(Complete this item at the request of the SHPO or FPO.)

name \_\_\_\_\_  
street & number \_\_\_\_\_ telephone \_\_\_\_\_  
city or town \_\_\_\_\_ state \_\_\_\_\_

**Paperwork Reduction Act Statement:** This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 460 et seq.).

**Estimated Burden Statement:** Public reporting burden for this form is estimated to average 18 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management, U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.

**United States Department of the Interior**  
National Park Service

**National Register of Historic Places**  
**Continuation Sheet**

Sk'in Village Cultural District
Name of Property
Klickitat County, WA
County and State
Name of multiple listing (if applicable)

Section number   12   Page       1      

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Ex 3

Attachment B: Map showing boundaries.



**United States Department of the Interior**  
**National Park Service**

**National Register of Historic Places**  
**Continuation Sheet**

Sk'in Village Cultural District
Name of Property
Klickitat County, WA
County and State
Name of multiple listing (if applicable)

Section number   12   Page       2      

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**Current Project location, USGS 7.5 minute topographic: Wishram 1994; Showing Site boundaries of 45KL77 as defined by YN CRP 2012**

Ex 3

**Location of artifacts identified by HRA within BPA ROW June 2012.**

United States Department of the Interior  
National Park Service

**National Register of Historic Places  
Continuation Sheet**

Sk'in Village Cultural District
Name of Property
Klickitat County, WA
County and State
Name of multiple listing (if applicable)

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**MAP SHOWING ARTIFACTS RECORDED IN THE NEWLY EXPANDED SITE BOUNDARY IN 2012**

ARCHAEOLOGICAL SITE INVENTORY FORM  
Page 31 of 63

Smithsonian Number 45KL77

Ex 3

United States Department of the Interior  
National Park Service

**National Register of Historic Places  
Continuation Sheet**

Sk'in Village Cultural District
Name of Property
Klickitat County, WA
County and State
Name of multiple listing (if applicable)

Section number 12 Page 4

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**PHOTOGRAPHS**

Ex 3

1 of 9 Artifact 1, basalt cobble chopper that is situated adjacent and north of the proposed structure 8/1

Ex 3

2 of 9 Artifact 2, basalt cobble chopper that is located on existing access road (650 m west of existing structure 16/1).

**United States Department of the Interior**  
National Park Service

**National Register of Historic Places**  
**Continuation Sheet**

Sk'in Village Cultural District

Name of Property  
Klickitat County, WA  
County and State

Name of multiple listing (if applicable)

Section number   12   Page       5      

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**Ex 3**

3 of 9 Artifact 3, red/yellow ccs flake manufactured by direct percussion. Pieces refit.

**Ex 3**

4 of 9 Artifact 4, basalt chopper near bedrock outcrop.

**United States Department of the Interior**  
National Park Service

**National Register of Historic Places**  
**Continuation Sheet**

Sk'in Village Cultural District
Name of Property
Klickitat County, WA
County and State
Name of multiple listing (if applicable)

Section number   12   Page       6      

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*l*

Ex 3

5 of 9 Artifact 5, basalt chopper near bedrock outcrop.

*l*

Ex 3

6 of 9 Artifact 6, basalt chopper near bedrock outcrop.

**United States Department of the Interior**  
National Park Service

**National Register of Historic Places**  
**Continuation Sheet**

Sk'in Village Cultural District
Name of Property
Klickitat County, WA
County and State
Name of multiple listing (if applicable)

Section number 12 Page 7

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Ex 3

7 of 9 Artifact 7 is a basalt cobble chopper near proposed structure 9/2.

Ex 3

8 of 9 Artifact 8 is a basalt cobble chopper southwest of proposed structure 9/2.

**United States Department of the Interior**  
National Park Service

**National Register of Historic Places**  
**Continuation Sheet**

Sk'in Village Cultural District
Name of Property
Klickitat County, WA
County and State
Name of multiple listing (if applicable)

Section number 12 Page 8

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Ex 3

9 of 9 Possible fallen cairn, Feature F1, southwest of proposed structure 9/2.



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

June 27, 2013

Ms. Lydia T. Grimm  
Environmental Planning & Analysis  
Bonneville Power Administration  
PO Box 3621  
Portland, Oregon 97208-3621

Re: Big Eddy-Knight Transmission Project /  
*Lewis & Clark Trial Determination of Eligibility*  
Log No.: 060409-08-BPA

Dear Ms. Grimm:

We are contacting you regarding Ms. F. Lorraine Bodi's letter and attachments of June 20, 2013 on the BPA determination of eligibility to the National Register of Historic Places for the Lewis and Clark National Historic Trail at Celilo Falls in relation to the Big Eddy-Knight Transmission Line Project, Klickitat County, Washington.

We do not concur with BPA's determination that the Lewis and Clark National Historic Trail at Celilo Falls is not eligible to the National Register of Historic Places.

We believe the Lewis and Clark National Historic Trail at Celilo Falls is eligible to the National Register of Historic Places.

We offer the following comments in support of the eligibility:

- As part of the Amended Programmatic Agreement (PA) for the Big Eddy-Knight Transmission Line Project a specific element requires BPA to consult with the National Park Service – Lewis and Clark National Historic Trail. We specifically requested the NPS Lewis & Clark National Historic Trail to participate and provide their substantive expertise and extensive knowledge to the documentation of the Lewis and Clark cultural resources for this Project.
- Ms. Bodi's letter on page 5 paragraph 1 does not acknowledge the fact that the NPS Lewis & Clark National Historic Trail completed a detailed and robust study of the Lewis & Clark National Historic Trail resources at Celilo Falls as a requirement of the PA. Most significantly, this detailed and discipline expert study was based upon historic analysis and on-site field work to document the National Register eligibility of the Lewis & Clark National Historic Trail at Celilo Falls.
- The BPA funded and detailed NPS study states in a 30 page report that we excerpt here: *The Lewis and Clark Expedition was one of the most dramatic and significant episodes in the history of the United States...the site has historical significance that makes it eligible for listing on the National Register of Historic Places.. the topography of the historic landscape has been altered very little from its natural state...the historic character of a mix of dry, short grass with treeless slopes...contributes to the integrity of the landscape.*
- We concur with findings of the detailed NPS report on the eligibility and significance of the



Ms. Lydia T. Grimm  
Environmental Planning & Analysis  
Bonneville Power Administration  
PO Box 3621  
Portland, Oregon 97208-3621  
Page 2

Lewis and Clark National Trail resources at Celilo Falls.

- Ms. Bodi's letter also references the Sk'n Village Cultural District aka 45KL 77. BPA determined this property eligible to the National Register of Historic Places and DAHP agreed on February 19, 2013. The Lewis and Clark Trail cultural resources were explicitly included and acknowledged in that Determination of Eligibility signed by BPA representative Ms. Lydia Grimm on November 12, 2012.
- We concurred that the SK'n Cultural District 45KL 77 with the knowledge that BPA accepted the determination of eligibility with the specific Lewis and Clark resources as part of that document. The determination of eligibility states on page 4 that Captain William Clark climbed to a vantage point within the SK'n Cultural District to map the Falls and the portage route. The Statement of Significance Applicable National Register Criteria acknowledges Criteria A and B with the association with Lewis and Clark Expedition and the integrity of the Cultural District as it related to both the Yakama Nation and their first encounter with Americans—Lewis and Clark.
- Finally, not acknowledged nor referenced in Ms. Bodi's letter is the recently completed High Potential Historic Sites Study authored by the National Park Service – Lewis and Clark National Historic Trail. The results of that study documented the significance and integrity of the Lewis & Clark National Historic Trail resources at Celilo Falls.
- We also request copies of the tribal correspondence from the Yakama Nation and the Confederated Tribes of the Umatilla Reservation. We request any correspondence or comments from concerned tribes or other parties, that you receive as you consult under the requirements of 36CFR800.4(a)(4).
- We request you provide DAHP all correspondence on this dispute regarding the eligibility of this property to the National Register of Historic Places as the dispute process proceeds.

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised.

State of Washington  
Department of Archaeology & Historic Preservation  
PO Box 48343 • Olympia, Washington 98504-8343  
360.586.3065  
[www.dahp.wa.gov](http://www.dahp.wa.gov)

Ms. Lydia T. Grimm  
Environmental Planning & Analysis  
Bonneville Power Administration  
PO Box 3621  
Portland, Oregon 97208-3621  
Page 3

Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents. We look forward to further consultations.

Sincerely,



Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 586-3080  
email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

State of Washington  
Department of Archaeology & Historic Preservation  
PO Box 48343 • Olympia, Washington 98504-8343  
360.586.3065  
[www.dahp.wa.gov](http://www.dahp.wa.gov)



File Code: 2360-3  
Date: July 2, 2013  
Project Code: KEC-4

Lorraine Bodi  
Vice President  
Bonneville Power Administration  
PO Box 3621  
Portland, OR 97208-3621

Dear Ms Bodi:

Thank you for sending me the Determination of Eligibility for Lewis and Clark National Historic Trail in relation to the Big Eddy-Knight Transmission Project (letter dated June 20, 2013).

My review covers:

The June 20, 2013 letter and the two enclosures: **"Cultural Landscape Inventory of the Lewis and Clark Portage Route and Campsite at Cello Falls, Killickit County, Washington"**, dated July 13, 2012 by Gail Gladstone, Cultural Resource Specialist, Lewis and Clark National Historic Trail and **"National Register of Historic Places Registration for Cello Bridge Site (45KL77)/ Sk'in Village Cultural District"**, signed by Lydia Grimm on November 14, 2012.

Thank you for presenting an articulate and reasoned discussion of this area as it relates to the Lewis and Clark Historic Trail.

This evaluation appears to be consistent with the amended Programmatic Agreement for the Big Eddy - Knight Project (2012) and with the National Scenic Area Management Plan.

"WHEREAS, BPA will consult with the National Park Service (NPS) in the NPS' capacity as administrator of the Lewis and Clark National Historic Trail (Lewis and Clark Trail) on the process of determining NRHP eligibility for the Lewis and Clark Trail within the Undertaking's APE, the Undertaking's effects on the Trail, and the resolution of any adverse effects of the Undertaking on the Trail."

The BPA has met this standard by receiving the Cultural Landscape Inventory report prepared by Gail Gladstone and dated July 2012. Numerous conference calls occurred with BPA and NPS regarding the Lewis and Clark Historic Trail between July 2012 and May 2013.

Preparation of the site form for 45KL77 and the National Register Registration (evaluation) for the Sk'in Village Cultural District are also consistent with the Amended PA.

Stipulations of the Programmatic Agreement include:

- I. B. "BPA shall ensure that a survey report for each unsurveyed area is prepared by professionals meeting the appropriate Secretary of the Interior's Standards for Qualified Professionals and in compliance with the CRGNSA Management Plan (as appropriate) and includes determinations for eligibility for the NRHP in accordance with 36 CFR 800.4 and finding of whether any historic properties found to be listed in or eligible for listing in the NRHP may be affected by the Undertaking in accordance with 36 CFR 800.4 or 5."
- C. 4. "For all eligible properties in Washington, BPA shall provide NPS 10-900 determination of eligibility forms. For all properties that BPA believes are not eligible a completed Washington State inventory form will be provided to the Washington SHPO. In both instances, BPA will state in writing whether it believes the subject property is



either eligible or not eligible for inclusion in the NRHP”.

The National Register Registration form for the Sk'in Village (45KL77) and the Determination of Eligibility of the Cultural Landscape Inventory for Lewis and Clark Historic Trail, presented in your letter dated June 20, 2013, meet these two stipulations.

Your letter of June 20, 2013 concludes:

“BPA concludes that the cultural landscape or historic site of the Lewis and Clark Expedition and National Historic Trail at Celilo Falls is *not eligible* for the National Register because the physical features that would provide the historic association with Lewis and Clark –the portages and campsite in association with Celilo Falls –are no longer visible due to inundation and other development. The site also lacks integrity of setting, feeling, and association and other aspects of integrity have been significantly compromised. The Lewis and Clark Expedition and associated Trail is clearly of national significance, as BPA has already acknowledged in finding that Lewis and Clark and the Corps of Discovery are a contributing element to the eligibility of the Sk'in Village Cultural District under criteria A and B. But we do not find sufficient physical evidence or integrity to identify the Lewis and Clark historic route as a site individually eligible to the National Register. Again, this is not to suggest that Lewis and Clark or the Trail are not important nationally or regionally, or that providing information or education for the public about Lewis and Clark in the area would be inappropriate (2013:11)”.

We concur with these findings.

Sincerely,

/s/ Margaret L. Dryden

MARGARET L. DRYDEN  
Heritage Program Manager



# Oregon

John A. Kitzhaber, MD, Governor

## Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0690

Fax (503) 986-0793

[www.oregonheritage.org](http://www.oregonheritage.org)

July 12, 2013

Mr. Kevin Cannell

BPA

PO Box 3621

Portland, OR 97208-3621

RE: SHPO Case No. 09-2694

Big Eddy-Knight Trans Project (060409-08-BPA)



Dear Mr. Cannell:

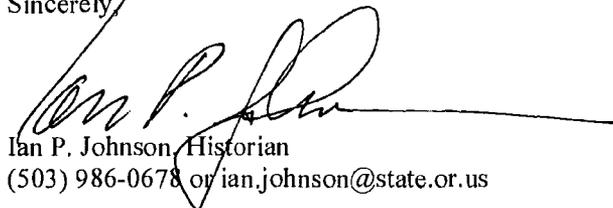
We appreciate the opportunity to comment on the National Register eligibility of the Celilo Falls segment of the Lewis and Clark National Historic Trail (Trail) as part of the Big Eddy-Knight Project. After considerable discussion among staff, the Oregon State Historic Preservation Office concurs with the Bonneville Power Administration (BPA) that the Trail at this specific location lacks sufficient historic integrity to be listed in the National Register of Historic Places. We further agree with BPA's conclusion that this determination does not affect the National Register eligibility of the Sk'in Village Cultural District or Celilo Falls for their associations with Native American lifeways and practices, nor does it imply that this important historic area should not be interpreted for the public, or that other segments of the Lewis and Clark National Historic Trail in Oregon are not eligible.

As we understand from the materials submitted, it is the Corps of Discovery's interaction with Native American lifeways, the recordation of the falls by William Clark, and the arduous passage around the falls that make this site notable from a National Register point of view. The places that tell that story: the upper and lower portage sites, the campsite, the sandy shores, and most importantly the falls, have all vanished. The addition of elements such as railroad grades on both sides of the river, an interstate highway, transmission lines, a bridge, and the town of Wishram further erode the place's ability to convey its historical associations as they relate to Lewis and Clark. Even though the broad landscape remains intact, such as the arid landscape, the river, the submerged falls, and the basalt cliffs, the place William Clark experienced from the top of Medicine Rock would look, sound, and feel much different today, if not entirely unrecognizable.

Further, the submitted materials note that no physical trace of the Corps of Discovery's visit to Celilo Falls has yet been identified, despite numerous studies. We therefore conclude that as a result of the alteration of the natural landscape and a lack of physical evidence, the Trail segment at Celilo Falls lacks sufficient historic integrity to be listed in the National Register of Historic Places.

Please feel free to contact our office with any further questions, comments, or concerns.

Sincerely,



Ian P. Johnson, Historian

(503) 986-0678 or [ian.johnson@state.or.us](mailto:ian.johnson@state.or.us)





## United States Department of the Interior

National Park Service  
Lewis & Clark National Historic Trail  
601 Riverfront Drive  
Omaha, Nebraska 68102-4226



July 9, 2013

F. Lorraine Bodi, Vice President  
Environment, Fish & Wildlife  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

Dear Ms. F. Lorraine Bodi ,

The National Park Service (NPS) received your letter of June 20, 2013, conveying Bonneville Power Administration's (BPA) determination that the Cultural Landscape at Celilo Falls is not eligible to the National Register of Historic Places for its association with Lewis and Clark and the Corps of Discovery. The NPS does not concur with this determination. We have and continue to assert that the historic landscape associated with Lewis and Clark within the area of the Project is eligible for inclusion in the National Register of Historic Places.

There are many points of disagreement regarding this issue that we have previously expressed and will rely on those communications rather than restate them at this time. We also wish to acknowledge the written documentation of non-concurrence with BPA's determination regarding the Trail from the State of Washington Department of Archaeology & Historic Preservation and from the Yakama Nation. BPA's determination that the historic site in the vicinity of the Project does not meet criteria for listing in the National Register is clearly disputed and the matter should be forwarded to the Keeper of the National Register for a final determination of eligibility.

As a point of clarification, NPS prepared the document, *Celilo Falls: Lewis and Clark Campsite and Portage Cultural Landscape Inventory*, unsolicited by BPA and prior to BPA's development of a statement of work for a study of the Lewis and Clark Trail in the project area. This inventory was completed by a Trail staff member, Cultural Resources Specialist, Gail Gladstone, for own inventory and assessment of resources and was given to consulting parties in support of the work the Yakama Nation was doing on the cultural survey of the Sk'in Village Cultural District. To our knowledge, the statement of work and the BPA proposed study of the Trail was never completed for this undertaking.

Thank you for the opportunity to comment. If you have any questions, please contact Dan Wiley, Chief of Resources Stewardship, Lewis and Clark National Historic Trail at 402-661-1830 or at Dan\_Wiley@nps.gov.

Sincerely,



Mark Weekley  
Superintendent

cc:

Mr. Paul Loether  
Chief, National Register of Historic Places and National Historic  
Landmarks Program, National Park Service  
National Register of Historic Places  
1201 Eye Street, NW (2280)  
Washington, DC 20005

Dr. Allyson Brooks  
State Historic Preservation Officer  
State of Washington  
Department of Archaeology & Historic Preservation  
P.O. Box 48343  
Olympia, Washington 98504-8343

Mr. Rob Whitlam  
State Archaeologist  
State of Washington  
Department of Archaeology & Historic Preservation  
P.O. Box 48343  
Olympia, Washington 98504-8343

Mr. Johnson Meninick  
Yakima Nation Cultural Resources Program Manager  
Confederated Tribes and Bands of the Yakama  
P.O. Box 151  
Toppenwish, Washington 98948

Jeffrey Durbin  
Section 106 Compliance Officer  
1201 Eye St, NW  
Washington, DC 20240

Stephanie Toothman  
Associate Director for Cultural Resources  
1849 C Street, NW Room 3128 MIB  
Washington, DC 20240

Sandra Washington  
Area Regional Director for Cultural Resources  
601 Riverfront Dr.  
Omaha, NE 68102

Donald Stevens  
Chief, HNRD  
601 Riverfront Dr.  
Omaha, NE 68102



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

SECURITY AND CONTINUITY OF OPERATIONS

December 6, 2013

In reply refer to: NN-1

Richard Till  
Friends of the Columbia Gorge  
522 SW 5th Ave, Ste 720  
Portland, OR 97204

### FOIA BPA-2013-01584-F

Dear Mr. Till:

This is a final response to your request for records that you made to the Bonneville Power Administration (BPA), under the Freedom of Information Act (FOIA), 5 U.S.C. 552.

**You requested the following:**

“Two documents; the determination of eligibility and effect, and the determination of eligibility that was provided to the keeper of the National Register.”

**Response:**

On October 8, 2013, BPA provided a letter dated August 5, 2013, to the National Parks Service. That letter had a number of enclosures that are listed here:

- 1-NPS Cultural Landscape Inventory
- 2-Sk'in Village Cultural District 10-900 form
- 3-BPA determination of not eligible letter; June 20, 2013
- 4-Washington DAHP do not concur letter; June 27, 2013
- 5-Yakama Nation do not concur letter; July 1, 2013
- 6-U.S. Forest Service, Columbia Gorge National Scenic Area concurrence letter; July 2, 2013
- 7-NPS do not concur letter; July 9, 2013
- 8-Oregon SHPO concurrence letter; July 12, 2013
- 9-Yakama Nation additional comments letter, July 31, 2013
- 10-BPA Notes regarding *Cultural Landscape Inventory of the Lewis and Clark portage route and campsite at Celilo Falls, Klickitat County, Washington*

BPA is providing the following documents from that list in their entirety:

- 5-Yakama Nation do not concur letter; July 1, 2013

9-Yakama Nation additional comments letter, July 31, 2013

10 - BPA Notes regarding *Cultural Landscape Inventory of the Lewis and Clark portage route and campsite at Celilo Falls, Klickitat County, Washington,*"

Pursuant to 10 CFR 1004.8, if you are dissatisfied with this determination, or the adequacy of the search, you may appeal this FOIA response in writing within 30 calendar days of receipt of a final response letter. The appeal should be made to the Director, Office of Hearings and Appeals, HG-1, Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585-1615. The written appeal, including the envelope, must clearly indicate that a FOIA Appeal is being made.

There are no fees associated with this request.

Please contact Kim Winn, FOIA Specialist, at 503-230-5273 with any questions about this letter.

Sincerely,

*/s/Christina J. Munro*

Christina J. Munro

Freedom of Information/Privacy Act Officer

Enclosures



Confederated Tribes and Bands of the Yakama Nation  
Established by the Treaty of June 9, 1855

Post Office Box 151  
Toppenish Washington 98948

F. Lorraine Bodi, Vice President  
Environment, Fish and Wildlife  
Department of Energy  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

July 1, 2013

RE: BPA's determination regarding the eligibility of the Lewis and Clark Historic Trail  
Associated with the Big Eddy-Knight Transmission Line Project and the  
Sk'in Village Cultural District

Dear Ms. Bodi,

Thank you for contacting the Yakama Nation Cultural Resources Program (CRP) regarding the Bonneville Power Administration's (BPA) determination regarding the eligibility of the Lewis and Clark Historic Trail associated with the Big Eddy-Knight Transmission Line Project and the Sk'in Village Cultural District. This letter is in response to the recent correspondence, dated June 20, 2013, in which the BPA made the determination that the Lewis and Clark Trail is not eligible to the National Register of Historic Places (NRHP). The Yakama Nation does not concur with BPA's determination. We find that the BPA has misapplied the NRHP guidelines, and therefore, their argument for a "not-eligible" status is fundamentally flawed and inaccurate.

Yakama Nation believes the trail to be eligible for listing in the NRHP. The Trail was noted in both Yakama Nation CRP's Traditional Cultural Property Study (Lally & Oliver, 2012) and the 45KL77 site form, as a contributing element to the archaeological site and Traditional Property. Yakama Nation CRP has the following general concerns regarding the BPA's determination:

- *Page 5, Paragraph 1:* The BPA states that the National Parks Service (NPS) did not intend for the Landscape study to be utilized for the purposes of a determination of eligibility (DOE). The Landscape study was the document that the BPA relied upon to make their determination. Yakama Nation questions whether or not utilization of this document was appropriate, and if BPA has express permission from the NPS to utilize the Landscape Study in such a manner. It was our understanding based on the Programmatic Agreement, teleconferences, and various correspondence that the NPS would be afforded the opportunity for consultation and direct study of the Lewis and Clark component of this project.
- *Page 5, Paragraph 2:* The BPA determined the Sk'in Village Cultural District (inclusive of the Sk'in Village Traditional Cultural Property and archaeological site 45KL77) eligible to the NRHP (and received DAHP's concurrence of February 19, 2013), justifying the District's eligibility in part due to the presence of Lewis and Clark. In the June 20, 2013 correspondence BPA states that the Lewis and Clark Trail is not eligible, having been considered in isolation from the District. This is completely contradictory. We question why the BPA now feels it necessary to isolate the Trail as a resource when it has already been determined as a contributing element to the Sk'in Village Cultural District. We further question how a resource can both contribute to a District's eligibility and be not eligible when considered in isolation.

Yakama Nation CRP has the following technical comments regarding the BPA's determination:

- *Page 7, Paragraph 1:* The BPA cites "National Register Bulletin 30: How to Apply the National Register Criteria for Evaluation." Our records indicate that the Bulletin with that title is Bulletin 15, as Bulletin 30 applies to the evaluation of rural historic landscapes. Please clarify which Bulletin BPA utilized.
- *Page 7, Paragraph 2:* BPA states that the Lewis and Clark Trail can be considered both a "site" and a "district" according to regulation/guidelines. It should be noted that the Trail is already recognized by BPA, in concurrence with DAHP, as a component of an eligible District.
- *Page 7, Paragraph 4:* BPA makes the argument that the Corps itself is significant under Criterion A and B noting, however, that the "significance of the Corps . . . does not automatically extend National Register eligibility to the Trail." This is an inaccurate application of NRHP guidelines. Bulletin 15 specifically notes on Page 4 that the NRHP does not apply to individuals or entities without association to physically concrete properties. NRHP Bulletin 32 states that "individuals must be directly associated with the nominated property."
- *Page 7, Paragraph 4:* Yakama Nation CRP does not agree with BPA's interpretation that the Trail lacks significance because it is a waterway. BPA has wrongly interpreted Bulletin 15, which states that *natural waterways or bodies of water* that served as "avenues of exploration" are generally excluded from the Register's definition of a "site." The Lewis and Clark portage route at Sk'in Village was a *land portage* route around Celilo Falls—thus the trail at that location was on land and never part of the natural waterway. Portions of the Trail at Sk'in Village are now underwater due only to modern inundation of Celilo Falls by construction of The Dalles Dam. The fact that a land portage route has been, only in part, inundated should not automatically exclude a resource from being considered as a site according to Bulletin 15. Furthermore, it should be noted that the Lewis and Clark component of Sk'in Village is much more than a single "trail;" it includes a camp location and aspects of the landscape (Lally & Oliver, 2012; Gladstone, 2012).
- *Page 8, Paragraph 1:* BPA states that "natural features associated with the Trail...are no longer available to support an eligibility determination associated with Corps." It is unclear why BPA has made this assertion despite documentation to the contrary. In Yakama Nation CRP's Traditional Cultural Property study (Lally & Oliver, 2012), and Churchill (2006) document in detail the intact nature of the landscape at Sk'in Village. Gladstone (2012) also provides documentation of intact and available landscape features, specifically pertinent to the Lewis and Clark era.
- *Page 8, Paragraph 2:* BPA calls the mapping location defined by NPS "conjecture." Communication with NPS and the private land owner indicate that there is documentation regarding location where Clark stood to make his map. This should be further investigated. We understand that the method of mapping utilized by Clark relied on specific points of reference. This type of mapping causes a rotational displacement of the physical features portrayed in the map. Measuring the rotational displacement of Clark's map against geo-rectified early aerial images can pinpoint the location where Clark stood to make the map. NPS should be provided an opportunity to address this in depth as further investigation might yield important information regarding this historic resource.
- *Page 8, Paragraph 4 and 5:* BPA argues that in absence of Celilo Falls, the Trail lacks appropriate *setting* as required under Bulletin 15. As noted above Lally and Oliver (2012) and

Gladstone (2012) provide documentation of intact setting. Although not explicitly, Churchill (2006) provides documentation that the pre-historic/proto-historic landscape is intact through his identification of legendary and monumental figures. To argue that the Falls are the only means by which *setting* can remain intact is an oversimplification of the significance of the Sk'in Village Cultural District, its meaning to our national history and Native American culture. Further, this is a disregard for existing documentation (i.e. Lally & Oliver, Gladstone, Churchill) regarding the intact nature of the setting. Yakama Nation considers the setting of this resource intact.

- *Page 8, 9 and 10 (general comment):* BPA is arguing that without material evidence, the Trail cannot be associated with Lewis and Clark, and is therefore, not eligible under Criterion A and B. Yakama Nation CRP notes that there is no requirement under A and B for the existence of material evidence (i.e. archeological material). Rather, NRHP Criterion A and B require association be documented through "accepted means of historical or archaeological research (including oral history), to have existed at the time of the event or pattern of events and to have been associated with those events." The Trail's (and the Sk'in Village Cultural District's) association with Lewis and Clark has been well documented through accepted historical means, including the Journals of Lewis and Clark, maps drawn by Corps of Discovery, a Traditional Cultural Property Study inclusive of oral histories (Lally & Oliver, 2012), and documentation from the NPS.

Furthermore, we do not believe the site to be completely absent of material (archaeological) evidence. Churchill (2005; 45KL77 site inventory form) notes two blue trade beads at 45KL77, described as: 1) a blue Italian hand faceted trade bead, and 2) light blue Italian cut bead, both of which may imply a date during the era of exploration and fur trade. There is a high potential that this resource will yield further archaeological data within the area of the Trail and 45KL77.

- *Page 9, Paragraph 2:* BPA states that the portage route is underwater, noting that therefore the integrity of location is compromised. Yakama Nation CRP disagrees. BPA's map on page 6 indicates that the portage route is not inundated within the Big Eddy-Knight APE and the small bench that extends south the BNSF Railway tracks. Our analysis, based on mapped locations of the Corps' river-exit and entrance locations indicates that the portage route is further north, more closely resembling the portage route at the base of the cliff as mapped by Clark. Further analysis must take place in order to accurately determine the location of the portage route. Further study and examination of primary references may yield additional data regarding a more accurate portage location.
- *Page 10, Paragraph 4:* The BPA states that there is no evidence that the Corps utilized nearby terrain. This is incorrect. An entry in the Lewis and Clark Journals on April 22<sup>nd</sup>, 1806 discuss Clark hiking to a high point (noted by University of Nebraska Press as Haystack Butte) to get an overview of the land. From that point it is noted that Clark could see the Cascade Range and Mount Jefferson. He described "an extensive view of the country . . . the range of Mountains which runs South from Mt. Hood as far as [he] could See" (Journals of William Clark, April 22<sup>nd</sup>, 1806).

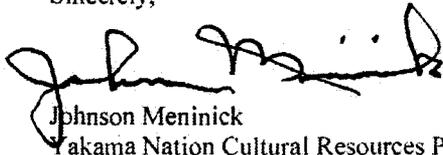
In summary, Yakama Nation CRP does not concur with the BPA's determination. CRP believes that the Trail's eligibility has already been determined through its association with the Sk'in Village Cultural District. On its own, however, we believe the Trail itself to be eligible under Criterion A and B, association having been thoroughly documented through both primary and secondary resources; Criterion C, as C applies to the eligibility of a District (of which the Trail is a part); and Criterion D, having the potential to yield data through further study.

We believe that the Trail's integrity is intact to the degree that a historical contemporary would recognize the property as it exists today. Recognizable features/landscapes include those documented by Lally and Oliver (2012), Gladstone (2012), and Churchill (2006).

Yakama Nation CRP requests clarification regarding the involvement of the NPS for this determination. We would specifically like to know if NPS was afforded any additional analysis beyond the Landscape Study provided by Gladstone (2012). We further request clarification regarding the Lewis and Clark National Historic Trail within this area. This trail is noted in Churchill (2006) as listed on the National Register of Historic Trails on March 21<sup>st</sup>, 1978. The BPA makes no mention of its listing in the recent determination.

If you have any questions, please feel free to contact me or Yakama Nation Archaeologist, Jessica Lally at x4766.

Sincerely,



Johnson Meninick  
Yakama Nation Cultural Resources Program Manager  
509-865-5121 x4737

CC: Rob Whitlam, Washington State Department of Archaeology and Historic Preservation  
Gail Gladstone, Cultural Resource Specialist, National Parks Service  
Dan Wiley, Chief, Integrated Resources Specialist, National Parks Service  
Kevin Cannell, Archaeologist, Bonneville Power Administration  
Brian O'Donnchadha, Archaeologist, Bonneville Power Administration



Confederated Tribes and Bands of the Yakama Nation  
Established by the Treaty of June 9, 1855

Post Office Box 151  
Toppenish Washington 98948

F. Lorraine Bodi, Vice President  
Environment, Fish and Wildlife  
Department of Energy  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

July 31, 2013

RE: BPA's determination regarding the eligibility of the Lewis and Clark Historic Trail  
Associated with the Big Eddy-Knight Transmission Line Project and the  
Sk'in Village Cultural District

Dear Ms. Bodi,

The Yakama Nation Cultural Resources Program (CRP) is in receipt of a letter dated July 9, 2013, from the National Park Service (NPS) to the Bonneville Power Administration. In that letter, the NPS provided information that is highly alarming considering the BPA's recent determination for the Lewis and Clark component of the Big Eddy-Knight Project. After discussing this on a technical level with BPA staff, we feel that important clarifications need to be made.

In the July 9, 2013 letter, NPS stated that their documented "*Celilo Falls: Lewis and Clark Campsite and Portage Cultural Landscape Inventory*", was not intended for use in BPA's recent determination. Yakama Nation specifically asked the BPA for that clarification in our July 1, 2013 letter of non-concurrence. It was our understanding that at the time of Yakama Nation CRP's TCP work on the Sk'in Village Cultural District, that NPS landscape study was provided in support of our work—not the BPA's determination. In fact, the BPA's June 20, 2013 determination letter states on page 5 that the NPS "apparently did not intend this document to be a determination of eligibility for listing on the National Register." Why did BPA utilize this document in contradiction to its purpose and in disregard of the consultative process?

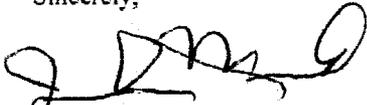
The Yakama Nation CRP stands by our July 1, 2013 letter of non-concurrence. However, we feel it is important to clarify that our non-concurrence was intended for BPA's determination as a whole—not just its statements regarding NRHP eligibility, but rather, BPA's utilization of the NPS report, BPA's consideration of the property as separate from Sk'in Village, as well as BPA's technical reasoning. In short, we reject BPA's determination regarding the Lewis and Clark component and feel it is only proper for BPA to re-enter consultation regarding these important issues.

BPA has not fostered a productive consultation process. Rather, the process has been hindered by lack of information. Earlier this year, Yakama Nation CRP staff attended weekly teleconferences in order to work in good faith with the BPA. For unknown reasons Mr. Cannell stopped scheduling these meetings. We feel that if these meetings had continued, confusion regarding the Lewis and Clark component of this project could have been avoided.

It is our understanding from discussion with BPA staff that utilization of the NPS study (without NPS permission) may result in the listing of Celilo Falls as a Lewis and Clark historic site. This is unacceptable to the Yakama Nation. We ask that the BPA immediately stop the Lewis and Clark issue from submission to the Advisory Council on Historic Preservation and re-enter communication on this issue with Yakama Nation CRP as a consulting party.

If you have any questions, please feel free to contact me or Yakama Nation Archaeologist, Jessica Lally at x4766.

Sincerely,



Johnson Meninick  
Yakama Nation Cultural Resources Program Manager  
509-865-5121 x4737

CC: Rob Whitlam, Washington State Department of Archaeology and Historic Preservation  
Gail Gladstone, Cultural Resource Specialist, National Parks Service  
Dan Wiley, Chief, Integrated Resources Specialist, National Parks Service  
Kevin Cannell, Archaeologist, Bonneville Power Administration  
Brian O'Donnchadha, Archaeologist, Bonneville Power Administration

BPA Notes regarding Cultural Landscape Inventory of the Lewis and Clark portage route and campsite at Celilo Falls, Klickitat County, Washington

The Washington State Department of Archaeology and Historic Preservation (DAHP) noted the following in their response to the Bonneville Power Administration's determination of eligibility (Whitlam, June 27, 2013):

- Ms. Bodi's letter on page 5 paragraph 1 does not acknowledge the fact that the NPS Lewis & Clark National Historic Trail completed a detailed and robust study of the Lewis & Clark National Historic Trail resources at Celilo Falls as a requirement of the PA. Most significantly, this detailed and discipline expert study was based upon historic analysis and on-site field work to document the National Register eligibility of the Lewis & Clark National Historic Trail at Celilo Falls.
- The BPA funded and detailed NPS study states in a 30 page report that we excerpt here: *The Lewis and Clark Expedition was one of the most dramatic and significant episodes in the history of the United States...the site has historical significance that makes it eligible for listing on the National Register of Historic Places.. the topography of the historic landscape has been altered very little from its natural state...the historic character of a mix of dry, short grass with treeless slopes...contributes to the integrity of the landscape.*

BPA did not fund the National Park Service (NPS) study; NPS conducted the study and drafted the report independently of the Big Eddy-Knight consultation process. DAHP asserts that the cultural landscape report, *Celilo Falls: Lewis and Clark Campsite and Portage Route Cultural Landscape Inventory National Park Service Lewis and Clark National Historic Trail*, authored by the NPS should be used as the basis for eligibility. While BPA used this report in developing its analysis of the Sk' in Cultural District and used it as a reference in the 10-900 National Register Eligibility Form for that District, further examination has revealed a number of inaccuracies in that report as described below. BPA is providing this information for the Keeper's record in evaluating the individual eligibility of the Lewis & Clark National Historic Trail.

1. The National Park Service defines cultural landscapes as, "geographic area (including both cultural and natural resources and the wildlife or domestic animals therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. There are four general types of cultural landscapes, not mutually exclusive: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes."<sup>1</sup> The report uses a definition that is inconsistent with the National Park Service's accepted definition of cultural landscapes.

*Cultural landscapes are settings that have been modified by human beings in the natural world*  
(Gladstone 2012:2).

2. The Corp of Discovery was not at Celilo Falls on October 25, 1806. The Corp left the morning of October 24<sup>th</sup>.<sup>2</sup>

*In the journals of the Lewis and Clark Expedition, the dates for this period range from October 22 to 25 of 1805* (Gladstone 2012:4).

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<sup>1</sup> "Defining Landscape Terminology," *Guidelines for the Treatment of Cultural Landscapes*, National Park Service, Department of the Interior, <http://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/terminology.htm>

<sup>2</sup> Meriwether Lewis, William Clark, et al., October 24, 1805 entry in *The Journals of the Lewis and Clark Expedition*, ed. Gary Moulton (Lincoln, NE: University of Nebraska Press / University of Nebraska-Lincoln Libraries-Electronic Text Center, 2005), <http://lewisandclarkjournals.unl.edu/journals.php?id=1806-09-04>

3. There are numerous references throughout the report to the “*top of the bluff to the north where Clark climbed to draw his map of the falls and portage route below...*” (Gladstone 2012:5). There is no reference in the journals to Clark climbing to the top of the bluffs while at Celilo Falls. The NPS report uses a quote from October 19, 1805 to support this claim:

*“I assended a high clift about 200 feet above the water from the top of which is a leavel plain extending up the river and off for a great extent, at this place the Countrey becoms low on each Side of the river, and affords a pros[pect?] of the river and countrey below for great extent both to the right and left;...”* (Gladstone 2102:7)

This journal entry is from four days prior to the Corps’ arrival at Celilo Falls (The Falls).

4. Gladstone (2012:13) acknowledges the location is only a hypothesis:

*It is surmised that Clark would have climbed to a high point on the cliffs above, as he did on many other instances along the route, to gain a better vantage of the river above and below as well as of the surrounding landscape. In the case of Celilo Falls, due to the shear (sic) nature of the cliffs, the most likely spot for Clark to climb to the plateau is via a more gradual rise past a feature known as “Medicine Rock”.*

5. The feature named “Medicine Rock” is never mentioned in the journals, nor does it appear in the traditional cultural property study prepared by the Yakama Nation. In addition the report states,

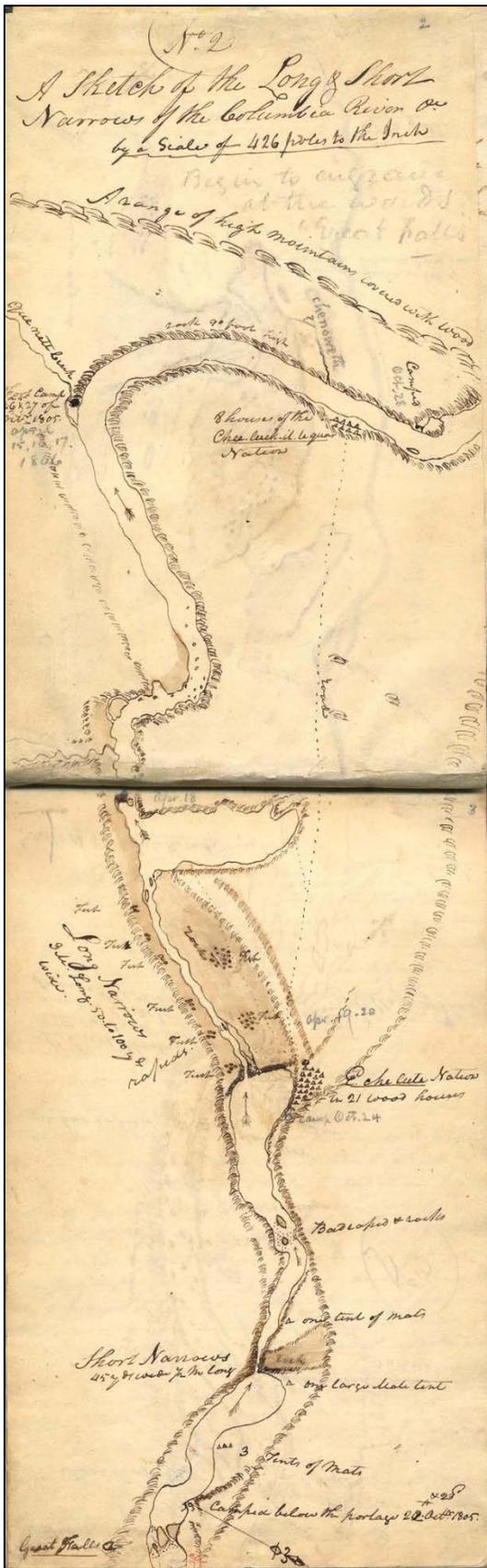
*A stone is placed between these two large rocks to provide a step up to continue along this path. Archeologists have identified this step stone as having been shaped and placed to fit between these two rocks centuries ago...* (Gladstone 2012:13)

There is no discussion of this stepping-stone in any of the previous documentation of the Sk’in Village Cultural District or its constituent archaeological sites; the NPS study provides no citation for this information.

6. There is an incorrect conflation of the Long Narrows with Celilo Falls.

*On the return journey, the Corps of Discovery met the challenge of the falls again in the high waters of spring which forced another portage around, ‘The long narrows are much more formadable than they were when we decended them last fall, there would be no possibility of passing either up or down them in any vessel at this time.’ William Clark, April 19, 1806* (Gladstone 2012:14).

While Clark and four men did return to Celilo Falls on April 19, 1806, the Long Narrows is a section of the Columbia River located seven miles downriver from the Celilo Falls. Clark drew a map of the Columbia River, noting the Long Narrows, Short Narrows, and Celilo Falls (the Great Falls) as separate features (See No. 2 A Sketch of the Long & Short Narrows of the Columbia River).



No. 2 A Sketch of the Long & Short Narrows of the Columbia River

The Long Narrows

The Short Narrows

The Great Falls and campsite.

American Philosophical Society, graphics 2628

7. The NPS paper has descriptions for village structures at Celilo Falls that are from dates in which the Corps was not present at the Falls.

*Some physical description of the structures is found in each of the members' journals; Ordway notes that the 'huts' are covered with a white cedar bark. Whitehouse describes on October 24: '...we halted and Camped for the night at a village of Savages or red people, which have their houses in our form only they have them in the ground except the roof which is covered with white cedar bark Some hewn plank which are very nice comfortable houses...' (Gladstone 2012:24).*

On October 24, the Corps camped at the area now known as Horsethief Lake, 10 miles downriver. (No. 2 A Sketch of the Long & Short Narrows of the Columbia River.)

8. Gladstone (2012:23) uses quotes from October 18 and 20, 1805 to support the characterization of vegetation at Celilo Falls.

*Historically, there were no trees on the site; Corps members repeatedly noted in their journals the lack of trees and the search for fuel with which to cook and having to resort to willow trees which grew along the shore. Whitehouse describes in his journal entry dated October 18, 1805: "We saw no Timber of any account, & were forced to make use of dry Willows for fuel to cook with, some few of which grew along the Shore, where we encamped." On October 20th Clark notes acorns that had been gathered by Indians. He was informed the acorns were from a white oak and they were gathered "above the falls". The acorns are from the Oregon white or Garry oak (Quercus garryana).*

Both of these quotes are from dates outside the period of significance for the Corps time at Celilo Falls.

9. The "Archeology" section documents archaeological sites that are part of the Sk'in Village Cultural District to support the archaeological evidence of the Lewis & Clark National Historic Trail. This area has a documented 10,000 year occupation by Native American people; however, to date no evidence of the Corps has been found despite many archaeological surveys.
10. In the "Cultural Traditions" section of the paper, traditions that were observed downriver at the Long Narrows are used to support traditions at Celilo Falls. While Celilo Falls is rich with cultural tradition, it is inappropriate to cite events that the Corps witnessed at other locations. Observations from October 20th and 24<sup>th</sup> did not take place at Celilo Falls.

*Geography, in the form of a dramatic narrowing of the Columbia at The Dalles and the resulting creation of ideal fishing stations, conspired with weather—warm dry winds blowing up the gorge—to make the Indian villages around the Long and Short Narrows, in Clark's words, "great mart[s] of trade." The Wishram Indians lived on the north bank at The Dalles; the Wascos occupied sites on the south side of the river. Although trading and fishing took place from Celilo Falls down to The Dalles, the most intense bargaining was done at the main Wishram village of Nix-luidix. That village, whose name meant "trading place," was located at the head of the Long Narrows. When Lewis and Clark visited it on October 24, they found some twenty large wooden plank houses. Each plank dwelling held three Wishram families. Asked by the explorers who they were, the Wishrams replied, "i'tcxluit," meaning "I am Ita'xluit." That phrase sounded like Echeloot to American ears; hence the Expedition's maps and journals always referred to the Wishrams as Echeloots." (Gladstone 2012:26)*

11. The NPS paper states:

*“there was great joy with the natives last night in consequence of the arrival of the salmon; one of those fish was caught; this was the harbinger of good news to them. they informed us that these fish would arrive in great quantities in the course of about 5 days. this fish was dressed and being divided into small peices was given to each child in the village’, Meriwether Lewis. Lewis and Clark witnessed a First Salmon Ceremony at Celilo Falls on their return journey in 1806” (Gladstone 2012:27).*

The Corps did not witness a salmon ceremony at Celilo Falls. This quote is from April 19, 1806 when the Corps is at the Long Narrows, seven miles downriver. Lewis writes, *“This morning early we had our small canoes drawn out, and employed all hands in transporting our baggage on their backs and by means of the four pack horses, over the portage. This labour we had accomplished by 3 P. M. and established our camp a little above the present Skil-lute village which has been removed a few hundred yards lower down the river than when we passed them last fall and like others below have the floors of their summer dwellings on the surface of the earth instead of those cellars in which they resided when we passed them. there was great joy with the natives last night...”*<sup>3</sup>

On the same day Clark writes, *“ We deturmined to make the portage to the head of the long narrows with our baggage and 5 Small Canoes, the 2 large Canoes we Could take no further and therefore Cut them up for fuel. we had our Small Canoes drawn up very early and employed all hands in transporting our baggage on their backs and by means of 4 pack horses, over the portage. This labour we had accomplished by 3 P. M. and established our Camp a little above the present Skillute village which has been removed as before observed a fiew hundred yards lower down the river than when we passed it last fall...”*<sup>4</sup> Salmon ceremonies occur at Celilo Falls, but the Corps did not witness them.

In addition to the factual inconsistencies in the paper, there are a numerous references to the lack of integrity in the landscape. If there is integrity in the landscape, the NPS’s own paper calls this into question.

1. Development of the site followed quickly in the wake of Lewis and Clark and began with the increasing European fur trade followed by the railroad and then European settlement. In the 1950s, engineered dams brought about great changes to every aspect of the Columbia River and the surrounding landscape. In addition to the railroad, transmission lines continue to impact the site and detract from the integrity (Gladstone 2012:4).
2. The site has suffered major impacts since the Corps of Discovery came through the area. The railroad changed the banks along the Columbia, harvesting materials from the shore to creating a straight line for moving people and goods throughout the Northwest. The inevitable dams built in the 1950s to harvest the power of the river and to provide for greater ease of movement up and down the river led to the inundation of the Great Falls of the Columbia- a major obstacle that Lewis and Clark had to contend with. In addition, a railroad bridge and a transmission line now cross the river at the site of the falls changing the integrity of the falls but illustrating a continuum of economic uses of the river at this most important spot (Gladstone 2012:7).
3. The damming of the river and subsequent flooding and the construction of the railroad has had a significant impact on the topography of the historic site. Both the flood and the railroad changed

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<sup>3</sup> Meriwether Lewis, William Clark, et al., April 19, 1806 entry in *The Journals of the Lewis and Clark Expedition*, ed. Gary Moulton (Lincoln, NE: University of Nebraska Press / University of Nebraska-Lincoln Libraries-Electronic Text Center, 2005), <http://lewisandclarkjournals.unl.edu/journals.php?id=1806-09-04>

<sup>4</sup> Ibid.

the shore line of the river impacting what would have been the route of the portage and the eddy and inlet created that served at the campsite. The change in the shoreline also eliminated the site of several Indian lodges Clark described as being at the bottom of the rapids... The dam also eliminated the effect of Aeolian sands that blew up the gorge and were deposited along the cliffs creating the sandy slopes down to the river (Gladstone 2012:10).

4. Topography has also been greatly impacted nearest the Washington side of the Oregon Trunk Line where larger quantities of sand and surrounding material have been removed to be used in the railroad and roadbed construction. The effect of this is a series of stepped terraces and a large scooped out area in the slopes extending from the cliffs. The cliffs and the great sandy slopes that remain, though now vegetated, contribute to the historic landscape. There is, however, the noticeable impact of two sections of the basalt cliffs that were blasted away for railroad and roadbed construction material (Gladstone 2012:11).
5. The historic circulation has been severely impacted on multiple fronts. The Dalles Dam was built in 1957 flooding the Celilo Falls and making the Columbia River more easily navigable... A portage rail operated on the Oregon side from 1862 until 1882. There were 14 miles of track operated by the Oregon Steam Navigation Company to convey freight around the falls to boats upstream. A canal was drilled out of solid rock for half its length and opened in 1915. The remainder lined with concrete where it cut through sand and gravel. A drop of 81 feet in the river was overcome with the construction of the waterway and locks (Gladstone 2012:15).
6. A railroad was built along the north bank of the Columbia River to establish a route between Portland, OR and Spokane, WA now the Burlington Northern and Santa Fe (BNSF). Construction of the railroad significantly impacted the historic site through the harvesting of local materials and the modification of the shore line in the construction of the rail beds. Sand and gravel was excavated along the shore towards the cliffs. Still extant on the site are the remnants of railroad spur lines placed to run the railcars used to gather material for this construction (Gladstone 2012:15).
7. In addition to impacts made by the railroad, there are impacts from vehicular circulation. Avery Road is a gravel road built across the site originating from the town of Wishram. This road runs parallel to the rail line; it is open to the public and is used by BNSF for maintenance on the line. In addition there is evidence of extensive off-road vehicle disturbance found at the base of the 'Y' extending north towards the basalt cliffs (Gladstone 2012:16).
8. All other existing circulation within the historic site have more significant impacts to the historic landscape and detract from the site's integrity (Gladstone 2012:18).
9. Views to the Celilo site are impacted by the intrusion of the McNary transmission tower on the top of the bluff. The tower can be seen from what would have been the portage route and the lines overhead that cross the river, can be seen from the campsite. Views along the portage route are impacted by the railroad, the gravel road, the disturbed slopes and the transmission tower. The view to and from the campsite is impacted by the railroad and the gravel road. From the campsite location, however, the transmission tower is obscured by the basalt cliffs. In addition, from the ground level of the campsite area, the view to the river is obstructed by the raised railroad bed. Inability to access the river, both physically and visually, is an adverse impact to the integrity of this cultural landscape (Gladstone 2012:18).
10. From the top of the bluff, however, looking out towards the river, the tower is less intrusive. Here the setting and feeling have the most integrity for the location of Clark's climb to the plateau to

gain a vantage point on the river and to draw his map and record the falls. From this high point on the plateau, there are unimpeded views up and down the river (Gladstone 2012:20).

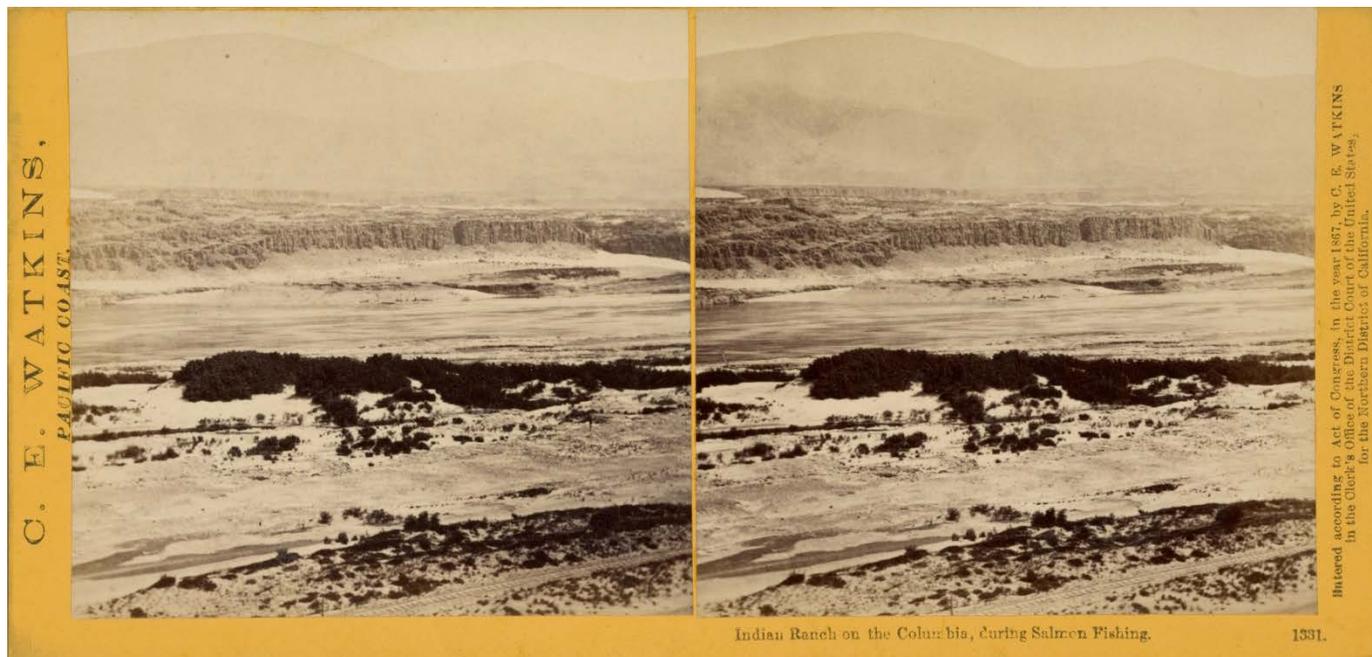
The place noted to have the “most” integrity, is a location that is not documented in the journals.

11. Construction of the dams has eliminated the source and supply of the blowing sand so vividly described in the journals of Corps members. The Aeolian process of sand transportation and deposition brings sands, blown by the wind to be deposited against the cliffs to create great, sandy slopes extending down from the basalt cliffs. The closing of the Dalles dam eliminated any new supply of wind-blown sand leading to the development of a biologic soil crust that are now able to support vegetation cover. The great, sandy slopes extending from the basalt cliffs are now much smaller than they had been historically and the sand-filled portage route as documented by Clark is vegetated with a diverse mix of dry, open exposure grass species. The canyon, Clark indicated on his map, was an area filled with sand; he illustrated the movement of the sand and sand actively being deposited at the mouth of the canyon. Presently, Himalayan blackberry (*Rubus discolor*) grows in a dense thicket throughout the canyon thriving most likely since the loss of the Aeolian sands (Gladstone 2012:23-24).
12. Impacts to the vegetation are found on the plateau from the long history of open grazing of cattle in the area. The two track road used for the maintenance of the transmission tower have allowed for some invasive species to become established (Gladstone 2012:25).
13. Significant damage has occurred to the site including inundation from damming, blasting to the cliff face for railroad construction material, erection of a transmission line tower on top of the bluff and an area of off road vehicle use and excavation disturbance below the bluff (Gladstone 2012:26).
14. The greatest impacts to integrity include the loss of the falls and the modifications brought on by the railroad. However, submerged below the surface of the river, the geology of the falls still exists. Other impacts include the effects of river regulation on the Aeolian sand and the flooding of the shore line that have eliminated the windblown sand transport from the river. The result of this had changed the vegetation on the slopes... (Gladstone 2012:29).

Of the 490 acres of the proposed NPS cultural landscape, 81.2% has been inundated by Lake Celilo; 7.4% is on the Oregon shoreline and consists of several active and one defunct rail lines, and a crowned and ditched access road, leaving the remaining 11.4% of the proposed landscape on the Washington side. Of this 11.4%, 18% is directly under railroad or an access road belonging to the railroad company. This leaves only 9% of the original 940 acres not inundated or covered by modern construction. This remaining 9% has been subjected to the impacts described above and the only place within the landscape where there is improved, but not complete integrity remaining is the location where Clark’s presence is a matter of conjecture; the alleged mapping site.

BPA asks the Keeper to keep these points in mind when considering the eligibility of the Lewis & Clark National Historic Trail proposed landscape. DAHP states BPA should defer to the NPS’s expertise, however, given the inconsistencies in the report, and the NPS’s acknowledgement of the numerous impacts to the landscape’s integrity, BPA finds that it cannot determine the Trail eligible within the Big Eddy-Knight area of potential effect. As stated in the accompanying cover letter, BPA believes that our determination of *not eligible* regarding the NPS defined Lewis & Clark cultural landscape is appropriate, and is based on an adequate level of documentation consistent with *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, *Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes*, *National Register Bulletin 32: Guidelines for Evaluating and Nominating Properties Associated with Significant Persons* and 36 CFR 63.

Historic landscape



Sk'in Village, 1867. Stereoscopic photo by C. E. Watkins.



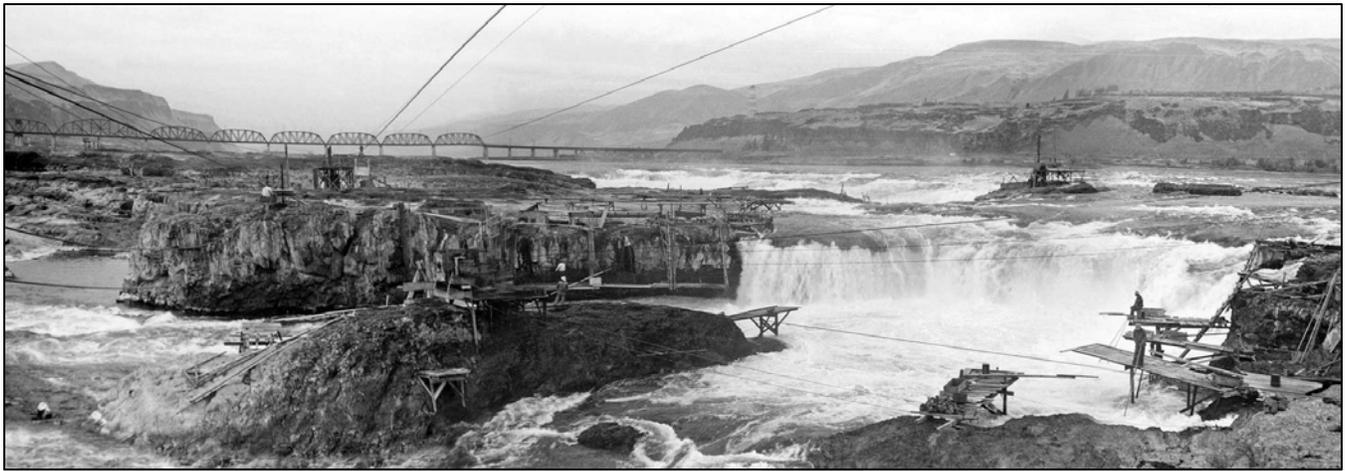
East of Celilo Falls, 1867.



Celilo Bridge and surrounding landscape, ca. 1920. Note the impact caused by the Celilo Canal in the foreground. It essentially removed the Corps portage route on the Oregon side of the river.



Celilo Canal, ca. 1920.



Celilo Falls panorama, ca. 1950s.

Modern landscape



Overview Sk'in Cultural District, Lake Celilo, and the Celilo Bridge, 2010.



Overview of the Washington shoreline facing south, 2013. The estimated location of the Corps portage route passes below the “Y” rail junction in an area now inundated. Also, note the extensive modern disturbance in the foreground including the railroad embankment and service road.