



March 4, 2015

Mr. Jeremy Sikes
Washington State Department of Ecology
4601 N. Monroe
Spokane, WA 99205

In future correspondence please refer to:
Log: 030215-33-GR
Property: City of Moses Lake Shoreline Master Program
Re: Review Comments

Dear Mr. Sikes:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). We have the following comments:

- In regard to 6-20-010, recommended change to this statement would read something like the following: “The following policies and regulations apply to sites, buildings, structures, districts, and objects within the shoreline jurisdiction that are identified in the Shoreline Inventory and Characterization; that are recorded at the Washington Department of Archaeology and Historic Preservation; and/or within local jurisdictions including the City of Moses Lake, Grant County, and affected Indian tribes; or that have been inadvertently discovered.
- We recommend clarifying Policy 6-20-020 (4) as to the purpose of this policy. It is unclear as to why access to these resources should be at public expense. Access to archaeological sites should be restricted to appropriate parties. Also please be aware the location of archaeological site is exempt from public disclosure to prevent looting and depredation (RCW 42.56.300).
- We recommend that “The completed archaeological evaluation should be submitted to DAHP and the interested Tribe for review prior to the issuance of any shoreline permits” to Policy 6-20-30(2).
- In the definitions in Chapter 13, we note the inclusion of a definition of “archaeological resources.” However, we recommend that definitions for cultural resources be broadened to be clear that the Shoreline Master Program addresses a broader range of cultural resource types.
- In regard to Appendix A Mitigation, it should be made clear elsewhere in the document (such as in section 6-20) that mitigation will also pertain to cultural resources that are negatively impacted and should be identified and implemented in consultation with DAHP, affected Tribes, and other appropriate affected parties.



There is little specificity or process with regard to cultural resources. There are also no details on how previously recorded archaeological sites will be recognized during pre-project review. We recommend that the City of Moses Lake enter into a data sharing agreement with DAHP so that archaeological and historic sites can be identified prior to project construction.

We also recommend adding process and specificity to the shoreline management plan regarding cultural resources. We have attached DAHP's model shoreline management language for that purpose.

Thank you for the opportunity to review and comment. Please feel free to contact us if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Gretchen Kaehler". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Gretchen Kaehler
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