

3.7 Cultural Resources

3.7.1 Sources of Information

In 1995, 1998, and 1999, Historical Research Associates, Inc. (HRA) and Dames & Moore conducted archaeological surveys of the proposed S2GF site, the proposed extension of the existing natural gas pipeline route, and the proposed 230 kV transmission line corridor. In addition to the field surveys, both HRA and Dames & Moore conducted research at the Washington State Office of Archaeology and Historic Preservation (OAHP) in Lacey, Washington. Information obtained at the OAHP included archaeological and historical site forms for previously recorded sites, and Cultural Resources Management (CRM) reports for studies completed in or near the project area.

CRM reports consulted for this project include:

- A 1997 archaeological survey of portions of SR 542 in Bellingham, Washington, by Archaeological and Historical Services (AHS) (Robinson 1997)
- A 1990 survey of the proposed natural gas pipeline and cogeneration plant for Sumas Energy, Inc. (Campbell 1990)
- A 1991 survey of an alternative pipeline route for the same project, by Northwest Archaeological Associates (NWAA) (Campbell 1990; Miss 1991).

3.7.2 Existing Conditions

3.7.2.1 Introduction

The cultural resources section identifies and evaluates National Register-eligible historic properties that could potentially be affected by (1) construction and operation of the S2GF plant, (2) construction and maintenance of the transmission line, and (3) upgrading and adding to the natural gas pipeline. More detailed information is provided in the cultural resources survey reports included in Appendix D-1 of the ASC (Sumas Energy 2 et al. 2000).

3.7.2.2 National Historic Preservation Act

Section 106 of the National Historic Preservation Act defines historic properties as:

...any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes

artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria. The term eligible for inclusion in the National Register includes both properties formally determined as such in accordance with regulations of the Secretary of the Interior and all other properties that meet the National Register criteria [36 CFR 800.16].

Therefore, historic properties being evaluated for this project could include archaeological sites, historical sites, and traditional cultural properties (TCP). A TCP is defined as a location whose “significance derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices” (National Register Bulletin 38).

Section 106 of the National Historic Preservation Act was developed by Congress to avoid unnecessary harm to historic properties. Assessment of National Register of Historic Places significance entails evaluation of cultural properties identified under a set of criteria specified in 36 CFR 60.4:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of significant persons in the past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded or may be likely to yield, information important in history or prehistory.

3.7.2.3 Archaeology and Ethnohistory

Archaeologists have constructed two chronological sequences that may be applied to the Sumas area. Borden (1968) produced a chronology for the Fraser River valley based on his investigations of tool types recovered in that area. The Washington OAHN developed Resource Protection Planning Process (RP3) contexts for several study units in western Washington. The North Puget Sound study area document includes a cultural sequence developed for San Juan, Island, Whatcom, Skagit, and Snohomish counties (Blukis Onat 1987:1). Both chronologies are used in this assessment.

Early Indian groups in the area included the Central Coast Salish speaking group, bands of the Halkomelem, and the Nooksack. Additional details about the ethnohistory are included in Appendix F, along with a summary of history and field investigations in the area.

The Nooksack Tribe has been informed about the project by SE2. The Tribe has indicated to SE2 that it has no concerns about the project (Appendix F).

3.7.3 Environmental Impacts of Proposed Action

3.7.3.1 Construction

Natural Gas Pipeline

The current S2GF plan calls for excavation of the existing pipeline route so that the new pipeline can be installed. Any impact to cultural resources would have occurred at the time of initial pipeline construction. The current excavation would not impact any cultural resources.

The only new portion of the pipeline would originate at the existing cogeneration plant and connect from there to the proposed S2GF. The new portions of the pipeline route are in areas that have been surveyed by either NWAA or HRA for the existing cogeneration plant or the S2GF facility, respectively. Both surveys resulted in the determination that cultural resources would not be affected by plant construction. The same finding holds true for pipeline construction.

230 kV Electric Transmission Line to Canada

The project would not impact the railroad segment potentially eligible for the National Register, which would be treated as a working railroad. Although the project would place the electrical transmission line along the railroad grade from Garfield Street north to the Canadian border, the line would consist of wood power poles. The appearance of the line would be similar to lines that typically follow railroads.

3.7.3.2 Operation

Because of the previous disturbance of the gas pipeline ROW and transmission line route, operation of the natural gas pipeline and the transmission line would not impact cultural resources.

3.7.4 Environmental Impacts of No Action

There would be no impact to cultural resources under the No Action Alternative.

3.7.5 Mitigation Measures

No mitigation measures are needed for the historic railroad segment eligible for the National Register because it would not be impacted by the project. If later-stage design of the project cannot avoid impacts to the railroad segment, it would be necessary to conduct additional historical research on the railroad and obtain a Determination of Eligibility from the OAH. If the railroad proves to be eligible, it would be necessary to develop and implement mitigation measures, which would likely consist of preparing text and photographs to document the railroad segment near Sumas.

It is not expected that archaeological materials would be encountered during the transmission line or natural gas pipeline installation. However, if archaeological materials are encountered, work should halt immediately and the State Archaeologist, Dr. Robert Whitlam, should be notified. A plan for mitigating the effects on the site should be developed and implemented prior to continuation of construction.

3.7.6 Cumulative Impacts

It is not expected that cultural resources would be impacted, therefore, there would be no cumulative impacts.

3.7.7 Significant Unavoidable Adverse Impacts

The proposed excavation is not expected to impact any cultural resources.