

September 4, 2023

TO: LUP-Comments@multco.us

RE: Case File No. T3-2022-16220 [Portland Water Bureau]

Please accept this letter in rebuttal of the applicant's Heritage Research Associates Inc., consultant's report, labeled as *Exhibit I.98, Response to Paul Solimano, Willamette Cultural Resources Associates rec 8.7.23*.

We concur with Mr. Solimano's recommendation quoted in the Heritage report on pg. 5, "*Mr. Solimano recommends that a more robust identification effort*" should be made regarding the cultural aspects of the lands impacted by the proposed project and pipeline lands, although such an effort is discounted by the applicant's consultant.

In fact, GeoVisions, a for-profit enterprise wholly owned and operated by the Confederated Tribes of the Warm Springs Reservation in Oregon [CTWSRO], lists additional cultural resource identification efforts that they recommend be performed on applicant's proposed work sites, in their letter that follows.

Why is it that only the applicant's paid consultants agree with the applicant that sufficient efforts have been made and that the Inadvertent Discovery Plan for Cultural Resources will be adequate to determine if artifacts or burial areas exist. And it is our understanding that the "*probing and monitoring of exploratory geotechnical excavations*" [pg. 1 of I.98], were initially done for geotechnical reasons and not for cultural resource reasons and may not be appropriate for this study.

If construction is allowed to start and the Inadvertent Discovery Plan for Cultural Resources is put in place without further investigative efforts, it is inconceivable that contractors will have employees running around behind enormous earth moving equipment removing millions of cubic yards of soil from the project, to pick up dirt clods and break them up to see if there is an artifact inside. And let's be realistic and practical, a contractor may do something to "check a box," but will he put the needed effort into a daily cultural investigation effort that could potentially shut down some or all of his work area? Again, what is the enforcement arm here?

This additional cultural evaluation effort must be done and reviewed before the application can be approved. Because of the importance and cultural significance discussed here, we urge you to consider requiring the applicant to perform a more rigorous and robust archeological survey, including subsurface testing and that the survey and testing be performed or overseen by an independent third party with credentials similar to GeoVisions*.

Respectfully,

Cottrell Community Planning Organization [Cottrell CPO]
cottrellcpo@gmail.com

Please see GeoVisions' letter that follows on page 3 and 4.

*Credentials:

Geovisions provide Cultural Resource Management Archaeology and Environmental services such as survey, testing, monitoring, and report writing that follows all federal, tribal, and state regulations including NEPA and Sections 106 & 110 of NHPA.

Brandon Gilliland serves Warm Springs GeoVisions as lead Operations Manager, Project Manager, and Public Outreach and Education Coordinator. He began his career in cultural resources in his home State of Florida, completing field school at Bulow Plantation State Park in Flagler Beach. Brandon received his Bachelor of Arts degree from the University of Florida with a focus on cultural resources management, cultural anthropology, and international relations. While at the University of Florida, Brandon worked three years at Anthrographic, a cultural resource management firm, as project manager and archaeologist.



Dear Cottrell Community Planning Organization,

I hope this letter finds you well. I am writing to introduce options for additional cultural resource identification efforts, an essential component of our ongoing efforts to engage with and preserve our region's rich heritage. GeoVisions can offer subsurface testing, oral history interviews, and assessing historic properties.

Before I delve into the details of these additional identification efforts, I want to clarify GeoVisions' unique position within this context. GeoVisions is a cultural resource management firm. GeoVisions is a for-profit enterprise wholly owned and operated by the Confederated Tribes of the Warm Springs Reservation in Oregon (CTWSRO). It is vital to understand that while GeoVisions is tribally owned, GeoVisions does not speak for, nor represent, the CTWSRO Tribal Government. This distinction is essential to maintain transparency and integrity in our collaborative efforts.

To my knowledge, the following was not included in the original scope of work for the Project:

1. **Subsurface Testing:** Subsurface testing could provide valuable insights into the historical use of land and uncover artifacts and features that may not be visible on the surface. This method will help us better understand the cultural significance of the areas under consideration.
2. **Oral History Interviews:** Oral history interviews are vital to any cultural resource survey. These interviews will allow us to document the knowledge, experiences, and stories of tribal members, the general public, and other impacted communities, providing a holistic perspective on the cultural significance of the areas in question. Moreover, they will foster collaboration and build trust between our organizations and communities.
3. **Assessment of Historic Properties:** Historic properties often have significant cultural, architectural, or historical value. They can tell the story of a community, a region, or even a nation's past. Assessing these properties helps protect and preserve this heritage for future generations.

These additional cultural resource identification efforts align with our organization's values of cultural preservation, community engagement, and responsible stewardship of our region's heritage. Furthermore, they demonstrate our dedication to fostering a more inclusive archeology.

Please let me know if I can provide any additional information about these identification efforts in case you are interested in GeoVisions completing this work on behalf of the property owner. Thank you for your attention to this matter, and I am available for any discussions or clarifications required.

Sincerely,

Brandon Gilliland