

4.8. Cultural Resources

4.8.1. Existing Conditions

Affected Environment

The cultural resources analysis area or Area of Potential Effects (APE) is defined as the geographic area(s) within which an undertaking may directly or indirectly cause change of character or use of archaeological and/or historic resources. The definition of the APE is influenced by the scale and nature of an undertaking. For the Whatcom County 10-Year Urban Growth Area (UGA) Review Draft Environmental Impact Statement (Draft EIS), the APE is considered identical to the UGAs and the land immediately abutting the Suitability Analysis Area (Figure 2-9). The UGAs together with the Suitability Analysis Study Area consist of approximately 25,759 acres of land that have been designated as UGAs or lie adjacent to UGAs in Whatcom County (County).

Environmental Setting

The County Planning Area is located in the Western Hemlock (*Tsuga heterophylla*) Zone of the Puget Trough physiographic province, a region once characterized by a wet, mild, maritime climate (Franklin and Dyrness 1988:70). Prior to development, vegetation in the County Planning Area included Douglas-fir (*Pseudotsuga menziesii*), Western hemlock (*Tsuga heterophylla*), Western red cedar (*Thuja plicata*), red alder (*alnus rubra*), swordfern (*Polystichum munitum*), and salal (*Gaultheria shallon*). This dense ground cover supported a wide variety of terrestrial fauna including deer (*Odocoileus sp.*), elk (*Cervus sp.*), beaver (*Castor sp.*), bear (*Ursus sp.*), and many small mammals. Marine and riverine resources, specifically salmon and mussels were prolific. The topography of the Gulf of Georgia region developed from scouring and modifications caused by Cordilleran glaciers passing through the region in the late Pleistocene. Glacial deposits are found in various locations within the gently rolling upland terraces that comprise the County Planning Area.

Cultural Setting

Prehistoric

Ames and Maschner (1999) created a general cultural sequence for the Pacific Northwest (Table 4.8-1), noting a shift from small groups of generalized hunter-fisher-gatherers to large, complex social groups with reliance on aquatic resources. Evidence of human occupation of the Gulf of Georgia area can be found to coincide with the stabilization of sea levels, approximately 6,000 to 5,000 years ago;

however, prior evidence may lie buried beneath the waters. Borden (1970) has found evidence of human occupation in the Fraser Valley dating to 10,000 years ago, but much of the archaeology in the County has focused on more recent shoreline shell middens (Ames and Maschner 1999). While most dated sites in the County tend to be less than 2,500 years old, a site near Ferndale has been dated to 4800 to 5000 before present (BP) (Anderson and Campbell 2003). No systematic survey of the County’s interior has been conducted and it is believed that the clustering of dates around 2,500 years ago is a result of sampling bias (Ames and Maschner 1999).

A review of the County Planning Area’s glacial history and vegetation, drainage, and climatic changes over time allows inferences to be made about when and how hunter-fisher-gatherers may have first inhabited and used resources in the area. As the climate stabilized and forests developed, approximately 6,000 years ago, animal species such as deer and elk emerged and became established. Salmon and other fish species used the lakes and streams in the vicinity of the County Planning Area at approximately the same time. Hunter-fisher-gatherers most likely hunted deer, elk, bear, and beaver, among others, in the forests, prairies, and riparian areas around the County Planning Area for the last 6,000 years. Salmon, trout, and other fish species would have been accessible in the waters surrounding the UGAs and Suitability Analysis Study Area, the Nooksack River, and the many small streams and lakes in the area. Plant resources such as camas, wapato, berries, and roots would also have been available at different times of the year.

Table 4.8-1. Pacific Northwest General Cultural Sequence

Dates	Period	Settlement	Subsistence	Technology
-11,500 BP	Paleoindian	Highly mobile, small groups	Generalized marine, shoreline and terrestrial resources	Stone, bone, antler, perishable materials Clovis points
11,500–5500 BP	Archaic	Highly mobile, small groups	Generalized marine, shoreline and terrestrial resources	Stone, bone, antler, perishable materials Olcott points
5500–3500 BP	Early Pacific	Increased sedentism in seasonal villages	Increased use of shoreline resources, expanded use of marine resources. Camas and shellfish first utilized	Increase in ground stone, bone, antler, perishable materials Cascade points
3500–1500 BP	Middle Pacific	Winter villages of plank houses and seasonal camps	Increased focus on marine and riverine resources. Food storage technologies developed	Decrease in stone tools, diversification of tools of bone, antler, perishable materials, canoes
1500–150 BP	Late Pacific	Large permanent villages and special use camps	Specialized marine, riverine, and terrestrial resources. Extensive food storage	Complex woodworking, increased use of perishable materials Very little stone storage

Source = Ames and Maschner 1999

Ethnographic

The County Planning Area is traditionally associated with speakers of the Central Coast Salish language group, including the Nooksack, Lummi, and Semiahmoo. The Lummi and Semiahmoo exploited coastal resources; whereas, the Nooksack focused on riverine resources, but the three groups had similar subsistence and habitation traditions. The traditional territory of the Semiahmoo included Drayton Harbor, Birch Bay and Cherry Point. The Lummi inhabited the County Planning Area around Lummi Bay and Bellingham Bay to Chuckanut Bay. The Nooksack lived in the Fraser River Valley, including the land around the Nooksack River. Like other Northwest Coast groups, the Central Coast Salish has a salmon-based subsistence supplemented by sea mammals, deer, elk, bear, beaver, waterfowl and other marine resources, such as mussels and mollusks.

Roots (e.g., camas and wapato), berries, tubers, and other staple vegetal resources were generally gathered by women. Cedar and other woods were important for both basic necessities such as boxes and canoes and elaborate ceremonial goods. While small groups would travel afield to access seasonally available resources, the winter village was the primary residence. Winter villages consisted of one or more long houses, but the Nooksack were also known to have erected semi-subterranean houses for colder times of the year. The Central Coast Salish are also known for their weaving, occasionally using wool from mountain goats, but more often from specially bred (now-extinct) dogs.

Life changed with the coming of Europeans. In 1827, Hudson's Bay Company established Fort Langley on the Fraser River and many Native Americans were employed by the Fort. In 1846, the Treaty of Washington created the US-Canada international border and split many tribes between the two countries. In 1855, under pressure from Washington to open Washington Territory to Euro-American settlers, Governor Isaac Stevens offered the Treaty of Point Elliot to local tribes. Of the Lummi, Semiahmoo, and Nooksack, only the Lummi signed the treaty and received a reservation. Many Nooksack were able to stay on or near their traditional lands by homesteading; however, they soon lost their tribal status. In 1971, the Nooksack were again recognized by the federal government (Suttles 1990).

Historic

While sporadic European contact occurred in the eighteenth century, the first sustained European Contact in the County Planning Area occurred in 1827 with the establishment of Hudson's Bay Company's Fort Langley. The mid-nineteenth century saw increased Euro-American settlement. With the opening of the territory for settlement, few people arrived until gold was discovered in the Fraser River in 1858. While many of the fortune seekers returned home empty-handed, many stayed and the County grew.

The County was created out of Island County on March 9, 1854. Early homesteaders, attracted by open prairies, established dairy, poultry, or fruit and vegetable farms. By 1925, the County was the leading producer of dairy products in Washington State and today still produces about 40% of Washington’s eggs (Emerson and Robinson 1996).

The Coast Salish primarily used canoes to travel the waterways of Whatcom County and early Euro-American settlers also found water travel easier than overland. Early communities such as today’s Bellingham and Blaine emerged on the coast and later many communities—such as Lynden, Nooksack, and Everson—were established on the banks of the Nooksack River. Early industries in the County were focused on lumber, fishing/canning, and farming. Lumber was in high demand after the 1906 San Francisco Earthquake and the County had acres of old growth and easy coastal access for shipping; lumber stands were soon depleted. Fishing and canneries soon replaced lumber as a major employer, but these industries, too closed. Railroads built stations in many cities in within the County in the late nineteenth to the early twentieth centuries. This helped speed the development of farms because of the ease of getting produce to markets in Seattle, Tacoma, and elsewhere.

Agriculture is still one of the major industries in the County. Tourism also grew in popularity beginning in the early twentieth century. While many of the early roads were wood plank, most were paved in the early twentieth century, which allowed increasing numbers of outdoor enthusiasts to visit Mt. Baker and other areas deemed attractive, ironically, for their remoteness.

Preservation Framework and Existing Programs

National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (NRHP) was established by the National Historic Preservation Act of 1966 as “an authoritative guide to be used by federal, state, and local governments; private groups; and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The NRHP recognizes properties that are significant at the national, state, and local levels. According to the NRHP guidelines, the quality of significance in American history, architecture, archaeology, 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 that:

- are associated with events that have made a significant contribution to the broad patterns of our history;
- are associated with the lives of persons significant in our past;

- 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
- have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP, unless they satisfy certain conditions.

The evaluation of integrity according to the NRHP is grounded in an understanding of a property's physical features and how these features relate to its historic significance. It is through the retention of original character-defining features that the significance of a resource is conveyed. The NRHP recognizes seven aspects or qualities that define the integrity of a property in various combinations:

- **Location.** Location is the place where the historic property was constructed or the place where the historic event occurred.
- **Design.** Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting.** Setting is the physical environment of a historic property.
- **Materials.** Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- **Workmanship.** Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- **Feeling.** Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- **Association.** Association is the direct link between an important historic event or person and a historic property.

There are approximately 64 properties included on the NRHP across the County Planning Area.

Washington Heritage Register

The Washington Heritage Register (WHR) is an official listing of historically significant sites and properties found throughout the state. The list is maintained by the Washington State Department of Historic Preservation (DAHP) and includes districts, sites, buildings, structures, and objects that have been identified and

documented as being significant in local or state history, architecture, archaeology, engineering or culture. The following is a list of qualifications for the WHR:

- A building, site, structure, or object must be at least 50 years old. If newer, the resource should have documented exceptional significance.
- The resource should have a high to medium level of integrity, i.e., it should retain important character-defining features from its historic period of construction.
- The resource should have documented historical significance at the local, state, or federal level.

Sites which are listed in the NRHP are automatically added to the WHR, and hence, a separate nomination form does not need to be completed. However, not all WHR properties are listed on the NRHP. There are currently 89 sites in the County that are listed on the NRHP or WHR. Table 4.8-2 provides a complete list of historic sites in the County.

Local Level

The County does not currently have a local historical society dedicated to recording significant structures in County history; however, the current comprehensive plan does call for the establishment of a historic preservation ordinance (Chapter 10 Design, Policy 10E-5).

Archaeological Resources

The County has a long history of human settlement. Under RCW 42.56.300 (1) and (2), specific locations of archaeological sites, historic sites, artifacts, or the sites of traditional religious, ceremonial, or social uses and activities of affected Indian tribes are exempt from disclosure under the above-mentioned chapter to prevent the looting or depredation of such sites. However, the review of known archaeological sites in the County Planning Area suggests that many of the sites are located along beaches, shorelines, and waterways. Both Native American and Euro-Americans relied on waterways for subsistence, raw materials, and travel. Campbell's (2004) predictive model suggests three variables are most significant for predicting site location: distance from tidelands, distance from salmon bearing streams, and elevation. That is, lower elevations near waterways or tidelands are more likely to contain cultural material than areas higher in elevation or further from water.

Table 4.8-2. Inventory of NRHP/WHR Historic Sites in Whatcom County

ID	City	Register Name	Historic Use	Listing Status	Style	Date Built	Address
1538	Acme	Middle Fork Nooksack River Bridge	Transportation	WHR and NRHP	None	1915	Mosquito Lake Road
1138	Bellingham	James F. Wardner House	Domestic	WHR and NRHP	Queen Anne	1890	1103 15th Street
1139	Bellingham	Pickett House	Domestic	WHR and NRHP	Vernacular	1856	910 Bancroft Street
1140	Bellingham	T.G. Richards and Company Store	Commerce/Trade	WHR and NRHP	Italian	1858	1308 E Street
1141	Bellingham	Gamwell House	Domestic	WHR and NRHP	Queen Anne	1892	1001 16th Street
1142	Bellingham	Fort Bellingham	Defense	WHR	Vernacular	1856	Address Restricted
1143	Bellingham	Whatcom Museum of History and Art	Government	WHR and NRHP	Queen Anne	1892	121 Prospect Street
1145	Bellingham	George H. Bacon House	Domestic	WHR and NRHP	Beaux Arts	1906	2001 Eldridge Avenue
1146	Bellingham	Fairhaven Historic District	Commerce/Trade	WHR and NRHP	Various	1888	10th and 13th Streets/Columbia and Larrabee Avenues
1149	Bellingham	Terminal Building	Commerce/Trade	WHR	Italian	1889	1101-1103 Harris Avenue
1151	Bellingham	Larrabee House	Domestic	WHR and NRHP	Beaux Arts	1915	405 Fieldstone Road
1152	Bellingham	Great Northern Passenger Station	Transportation	WHR and NRHP	Italian	1927	South End of D Street
1153	Bellingham	Robert I. Morse House	Domestic	WHR and NRHP	Queen Anne	1896	1014 North Garden Street
1154	Bellingham	Victor A. Roeder House	Domestic	WHR and NRHP	Arts and Crafts	1908	2600 Sunset Drive
1155	Bellingham	Old Main, Western Washington State College	Education	WHR and NRHP	Beaux Arts	1896	516 High Street
1156	Bellingham	Young Women's Christian Association	Social	WHR and NRHP	Colonial	1915	1026 North Forest Street
1158	Bellingham	Mount Baker Theatre	Recreation and Culture	WHR and NRHP	Spanish	1927	106 North Commercial Street
1159	Bellingham	Lottie Roth Block	Commerce/Trade	WHR and NRHP	Queen Anne	1890	1106 West Holly Street
1160	Bellingham	Aftermath Clubhouse	Social	WHR and NRHP	Italian	1904	1300 Broadway
1162	Bellingham	Eldridge Avenue Historic District	Domestic	WHR and NRHP	Various	1885	Eldridge Avenue and Environs
1163	Bellingham	Alfred L. Black House	Domestic	WHR and NRHP	Queen Anne	1903	158 South Forest Street

ID	City	Register Name	Historic Use	Listing Status	Style	Date Built	Address
1165	Bellingham	Leopold Hotel	Domestic	WHR and NRHP	Spanish	1913	1224 Cornwall Avenue
1166	Bellingham	Flatiron Building	Commerce/Trade	WHR and NRHP	Commercial	1907	1311-1319 Bay Street
1167	Bellingham	Eldridge Homesite and Mansion	Domestic	WHR and NRHP	French	1926	2915 Eldridge Avenue
1168	Bellingham	J.J. Donovan House	Domestic	WHR and NRHP	Queen Anne	1900	1201 Garden Street
1169	Bellingham	Bellingham National Bank Building	Commerce/Trade	WHR and NRHP	Beaux Arts	1912	101–111 East Holly Street
1170	Bellingham	Morse Hardware Company Building	Commerce/Trade	WHR and NRHP	Commercial	1902	1023-1025 North State Street
1174	Bellingham	B.P.O.E. Building	Social	WHR and NRHP	Beaux Arts	1912	1412-1414 Cornwall Avenue
1175	Bellingham	Montague and McHugh Building	Commerce/Trade	WHR and NRHP	Beaux Arts	1927	114 West Magnolia
1177	Bellingham	Washington Grocery Company Warehouse	Commerce/Trade	WHR and NRHP	Beaux Arts	1912	1125 Railroad Avenue
1180	Bellingham	Oakland Block	Commerce/Trade	WHR and NRHP	Commercial	1890	310–318 West Holly Street, 419 Champion Street
1182	Bellingham	U.S. Post Office and Court House	Government	WHR and NRHP	Beaux Arts	1913	104 West Magnolia Street
1413	Bellingham	Fairhaven Library	Education	WHR and NRHP	Queen Anne	1904	1105 12th Street
1448	Bellingham	Park Butte Lookout	Government	WHR and NRHP	Other	1932	Mt Baker Ranger District SW of the Easton Glacier of Mt Baker
1717	Bellingham	Sehome Hill Historic District	Domestic	WHR and NRHP	Various	1895	Portions of Jersey, Key, Liberty, Mason, Newell, East Myrtle, East Laurel, and East Maple Streets
1747	Bellingham	Hotel Laube	Domestic	WHR and NRHP	Beaux Arts	1903	1226 North State Street
1819	Bellingham	Immanuel School of Industries- Department of Public Welfare	Education	WHR and NRHP	Other	1906	1303 Astor Street
1854	Bellingham	Sweet and Company Building	Commerce/Trade	WHR	Commercial	1902	1021 North State Street
1855	Bellingham	Barlow Building	Commerce/Trade	WHR and NRHP	Commercial	1892	211 West Holly Street
1856	Bellingham	Daylight Building	Commerce/Trade	WHR and NRHP	Beaux Arts	1904	1201–1213 North State Street
1859	Bellingham	Sanitary Meat Market	Agriculture/Subsistence	WHR and NRHP	Commercial	1902	1015–1019 North State Street
1861	Bellingham	Bernard and Anna Montague, House	Domestic	WHR	American	1907	1030 North Garden Street

ID	City	Register Name	Historic Use	Listing Status	Style	Date Built	Address
					Foursquare		
2204	Bellingham	Barn	Agriculture/Subsistence	WHR-Barn		1925	349 Kline Road
2207	Bellingham	Will D. Jenkins Barn	Agriculture/Subsistence	WHR-Barn		1923	2753 Lake Whatcom Boulevard
2209	Bellingham	Sarland Barn	Agriculture/Subsistence	WHR-Barn		1935	156 Shallow Shore Road
2261	Bellingham	Woodstock Farm	Agriculture/Subsistence	WHR-Barn	Other	1910	1200 Chuckanut North
2273	Bellingham	Barn	Agriculture/Subsistence	WHR-Barn	Other	1909	4269 Dewey Road
1157	Blaine	Peace Arch	Government	WHR and NRHP	Beaux Arts	1921	Peace Arch State Park, US 5 at the US-Canada Border
1179	Blaine	M.V. Plover (Ferry)	Transportation	WHR and NRHP	None	1944	245 Marine Drive, Blaine Harbor Berth A-11
1384	Blaine	Si'ke Village With Historic Area Called Tsi'lich	Domestic	WHR and NRHP	None		Address Restricted
1255	Concrete	Koma Kulshan Ranger Station	Government	WHR and NRHP	Arts and Crafts	1933	Forest Road 11, West of Baker Lake, Mount Baker-Snoqualmie National Forest
1869	Deming	Nuxwt'iqw'em	Religion	WHR	None		Address Restricted
1735	Diablo	Beaver Pass Shelter	Recreation and Culture	WHR and NRHP	Arts and Crafts	1938	Beaver Pass, 14 Miles West of Ross Lake
1742	Diablo	Sourdough Mountain Lookout	Government	WHR and NRHP	Other	1933	On Sourdough Mountain, 5 Miles Northeast of Diablo
1172	Everson	George Goodwin Cabin	Domestic	WHR	None	1878	7369 Goodwin Road
2208	Everson	Ole Helgeson Barn	Agriculture/Subsistence	WHR-Barn		1890	6506 Siper Road
2210	Everson	Blankers Barn	Agriculture/Subsistence	WHR-Barn		1939	3200 Lindsay Road
2212	Everson	Judd Porter Barn	Agriculture/Subsistence	WHR-Barn		1910	1724 Central Road
1148	Ferndale	Hovander Homestead	Agriculture/Subsistence	WHR and NRHP	Queen Anne	1889	5299 Neilson Road
1749	Ferndale	Pioneer Park	Landscape	WHR	None	1901	2002 Cherry Street, Corner of Cherry and Ferndale Road
2211	Ferndale	Angelo Hovander Barn	Agriculture/Subsistence	WHR-Barn		1910	5249 Imhof Road
2300	Ferndale	Terrell Barn	Agriculture/Subsistence	WHR-Barn	Other	1905	6022 North Star Road
1173	Glacier	Sampson Ranch	Domestic	WHR	Arts and Crafts	1917	Mount Baker Highway

ID	City	Register Name	Historic Use	Listing Status	Style	Date Built	Address
1183	Glacier	Glacier Ranger Station	Government	WHR and NRHP	Arts and Crafts	1938	Mount Baker Highway
1254	Glacier	Austin Pass Warming Hut	Recreation and Culture	WHR and NRHP	Arts and Crafts	1940	Southeast of Bagley Lakes, Mount Baker-Snoqualmie National Forest
1256	Glacier	Wild Goose Pass Tree	Government	WHR and NRHP	None	1893	Mt. Baker - Snoqualmie National Forest
1326	Glacier	Nooksack Falls Hydroelectric Power Plant	Industry/Processing/Extraction	WHR and NRHP	Other	1906	Route 542 on Nooksack River
1737	Hozomeen	Deer Lick Cabin	Recreation and Culture	WHR and NRHP	None	1936	East of Ross Lake on Lightening Creek Trail, South of Three Fools Trail
1738	Hozomeen	Desolation Peak Lookout	Government	WHR and NRHP	Other	1932	On Desolation Peak East of Ross Lake, 6 Miles South of Canadian Border
1739	Hozomeen	Fish and Game-Hozomeen Cabin	Government	WHR and NRHP	Arts and Crafts	1935	Hozomeen Lake-Lightening Creek Trailhead on East Side of Ross Lake
1740	Hozomeen	International Boundary US--Canada	Government	WHR and NRHP	None	1906	Along Us-Canada Border Between Eastern Boundary of Ross Lake N.R.A. and Western Boundary of North Cascades National Park
1741	Hozomeen	Perry Creek Shelter	Recreation and Culture	WHR and NRHP	Other	1937	On Little Beaver Trail, 5 Miles West of Ross Lake
1161	Lummi Island	Beach Store	Commerce/Trade	WHR	Vernacular	1901	Nugent Road
1144	Lynden	Berthusen Barn and Privy	Agriculture/Subsistence	WHR and NRHP	Other	1901	8837 Berthusen Road
1380	Lynden	US Post Office--Lynden Main	Government	WHR and NRHP	Art Deco	1941	600 Front Street
2205	Lynden	Barn	Agriculture/Subsistence	WHR-Barn		1898	628 W. Wiser Lake Road
2206	Lynden	Ralph Van Dyk Barn	Agriculture/Subsistence	WHR-Barn		1932	7585 Noon Road
1178	Newhalem	Skagit River and Newhalem Creek Hydroelectric Projects	Industry/Processing/Extraction	WHR and NRHP	Various	1917	At Newhalem on the Skagit River and at Ross Dam
1181	Newhalem	Devil's Corner Cliff Walk	Transportation	WHR and NRHP	None	1895	North of Newhalem in Ross Lake National Recreation Area
1324	Newhalem	Diablo Hydroelectric Power Plant	Industry/Processing/Extraction	WHR and NRHP	Other	1929	Off WA 20 at West End of Diablo Lake
1325	Newhalem	Gorge Hydroelectric Power Plant	Industry/Processing/Extraction	WHR and NRHP	Other	1918	Off WA 20 at West End of Gorge Lake

ID	City	Register Name	Historic Use	Listing Status	Style	Date Built	Address
1736	Newhalem	Copper Mountain Fire Lookout	Government	WHR and NRHP	Other	1934	On Copper Mountain, 10 Miles East of Hannegan Campground
1768	Newhalem	Gorge Creek Bridge	Transportation	WHR	None	1955	State Route 20 Over Gorge Creek
1150	Nooksack	WW and BC Conference Camping Association	Religion	WHR	Vernacular	1898	West Garfield Street
1147	Point Roberts	Boundary Marker No. 1	Government	WHR and NRHP	None	1861	Marine Drive at U.S./Canada Border
1176	Point Roberts	Chelhtenem	Domestic	NRHP	None		Address Restricted
1449	Sedro Woolley	Winchester Mountain Lookout	Government	WHR and NRHP	Other	1932	Mount Baker Wilderness Area Overlooking the N Fork of Nooksack River and W Fork of Silesia Creek
1310	Sumas	United States Border Station at Sumas	Government	WHR	Colonial	1932	131 Harrison Street
2299	Sumas	Nelson Knight Barn	Agriculture/Subsistence	WHR-Barn	Other	1934	4289 Rock Road

Bellingham Study Area

The Bellingham study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole. Bellingham is within the traditional boundary of the Nooksack and was created in 1903 out of four early towns: Whatcom, Sehome, Bellingham, and Fairhaven. Among the earliest settlers were Henry Roeder and Russell Peabody who arrived in 1852. They erected a saw mill along Bellingham Bay, which was one of the major employers of the region but was never profitable. Population grew around Bellingham originally because of its location near the Fraser River gold fields and later as a lumbering center. The T.G. Richards and Company Store—the first brick building in Washington State—was built in Bellingham in 1858 to hold stores for gold rush miners (Sullivan and Howard 2003). Coal was discovered by Henry Roeder in 1853 and coal mining was also a major employer until the early twentieth century. Salmon canning was also a major industry until the mid-twentieth century; however, not all employees worked in factories. The early towns were filled with male, industrial workers and the town of Whatcom established a red light district in its city charter in 1901 (Gillis and Larson 2004).

The Northern Pacific and Great Northern Railroads came to Bellingham in 1870s through the 1880s, further spurring its growth and connecting it to local and national markets. Bellingham continued to grow at a rate not seen in other cities within the County and is currently the largest city and county seat. Bellingham has the highest concentration of NRHP/WHR sites in the entire County Planning Area and many recorded archaeological sites.

Most NRHP/WHR structures in Bellingham are residential or commercial buildings. Prehistoric archaeological sites are generally located near waterways and shorelines. Historic archaeological sites are also associated with waterways, railroad grades, or the areas of the original four towns. Table 4.8-3 lists the previously recorded archaeological sites in Bellingham study area; sites have not been evaluated for NRHP eligibility unless otherwise noted.

Table 4.8-3. Previously Recorded Archaeological Sites in the Bellingham Study Area

Site No.	Name	Type	Time Period
45-WH-41	--	Shell midden, lithics	Precontact
45-WH-47	--	Shell midden, lithics, historic debris	Precontact/Historic
45-WH-50	--	Historic burial, lithics	Precontact/Historic
45-WH-54	--	Shell midden	Precontact
45-WH-55	--	Shell midden, lithics	Precontact
45-WH-56	--	Shell midden, lithics	Precontact

Site No.	Name	Type	Time Period
45-WH-60	--	Shell midden	Precontact/Historic
45-WH-71	--	Lithic scatter	Precontact
45-WH-76	--	Lithic scatter	Precontact
45-WH-77 ²			
45-WH-78	--	Petroglyph	Prehistoric (?)
45-WH-502	Baker Creek Site	Lithic scatter	Precontact
45-WH-725	Interurban Railway Grade and Hibridge	Historic Railroad properties	Historic
45-WH-726	Little Squallcum Creek Site	Lithic scatter	Precontact
45-WH-732	Mennig & Co. Saloon Site	Historic debris, historic structures	Historic
45-WH-735	Whatcom Roeder Mill Site and Shell Midden	Historic debris, shell midden	Precontact/Historic
45-WH-740	--	Shell midden	Precontact
45-WH-742	--	Lithic scatter	Precontact
45-WH-757 ¹	Squalicum Pier	Historic structure	Historic
45-WH-758	--	Shell midden	Precontact
45-WH-762	Bellingham Bay Coal Company's Wharf	Historic structure	Historic
45-WH-763	--	Shell midden	Precontact
45-WH-769	--	Shell midden	Precontact
45-WH-833	Bellingham Coal Company Wharf Sunken Vessel	Shipwreck	Historic

¹ Determined not eligible for listing on the NRHP.

² Data pending.

The Birch Bay study area has a high probability for cultural resources because of its geomorphology. Many archaeological sites consist of shell middens located along the shorelines and waterways of Birch Bay. Previous excavations have uncovered human remains in some of these shell middens. Table 4.8-4 lists the previously recorded archaeological sites in the Birch Bay study area; sites have not been evaluated for NRHP eligibility unless otherwise noted.

Table 4.8-4. Previously Recorded Archaeological Sites in the Birch Bay Study Area

Site No.	Name	Type	Time Period
45-WH-9	Strav-a-wa Village Site	Shell midden , village, human remains	Precontact
45-WH-10	--	Shell Midden	Precontact
45-WH-11	--	Shell Midden, village, lithics, human remains	Precontact

Site No.	Name	Type	Time Period
45-WH-22	--	Shell Midden, lithics	Precontact
45-WH-24	--	lithic scatter	Precontact
45-WH-29	--	Shell midden, lithics	Precontact
45-WH-62	--	Shell midden, lithics	Precontact
45-WH-65	--	lithic scatter	Precontact
45-WH-66	--	lithic scatter	Precontact
45-WH-67	--	Shell midden, human remains	Precontact
45-WH-72	--	shell midden, hearth	Precontact
45-WH-74	--	Shell midden, lithics	Precontact
45-WH-494 ¹	--	lithic scatter	Precontact
45-WH-522	--	Shell midden	Precontact
45-WH-693 ²			
45-WH-705	--	Lithic isolate	Precontact
45-WH-706	--	Lithic isolate	Precontact
45-WH-736	--	Lithic isolate	Precontact
45-WH-739	Birch Bay Resort Site	Shell midden, lithics	Precontact
45-WH-767	--	Lithic isolate	Precontact
45-WH-770	--	Shell midden	Precontact

¹ Determined not eligible for listing on the NRHP.

² Data pending.

Blaine Study Area

The Blaine study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole. Blaine is in the traditional area of the Semiahmoo and was originally charted in 1841 by Lieutenant Charles Wilkes in the United States Exploring Expedition. Although it was connected to Hudson's Bay Company activity, there was little settlement until the 1858 Fraser Valley Gold Rush, and permanent settlement did not begin in earnest until the 1870s. Two settlements, both called Semiahmoo, emerged around Drayton Harbor. Initially, it was a base for the gold rush, but later logging and fishing grew as the main industries. Blaine itself was platted in 1884 and incorporated in 1891 (Emerson 2004). The first sawmill opened in 1866 and lumber thrived after the 1906 San Francisco Earthquake (Roth 1926). After the lumber was logged, fishing remained as the primary industry. The Alaska Packers' Association set up in 1881 and operated at the world's largest cannery for years (Kirk and Alexander 1990). Early significant homesteaders included John and Lucretia Cain whose sons platted the town and started a hotel, mill, general store, wharf, dock, and newspaper (Historical Research Associates n.d.). The Great Northern Railroad established a terminus in 1891 allowing the transport of goods to and from local and national

markets. Because of Blaine's proximity to the Canadian border, smuggling has long been a feature of local life. Many historic homes and buildings in Blaine were burned during the Prohibition as a way to distract border agents (Historical Research Associates n.d.). By the mid-twentieth century, the mills and canneries had closed and agriculture and tourism became the major industries.

Reid and Nored-Pratschner (2007b) note that archaeological sites in Drayton Harbor have been found on old terraces at elevations of 23 to 98 feet have the earliest evidence of occupation at around 3,000 to 5,000 years ago. On more recent terraces, sites date to the last 4,000 years. There is a high probability of finding archaeological sites all around Drayton Harbor. There is also evidence of a proto-historic/historic Semiahmoo village at the mouth of California Creek in Drayton Harbor (Suttles 1951). Recorded cultural resources in the Birch Bay study area tend to consist of shell middens, village sites, human remains, lithic scatters, and historic debris/structures. The two properties listed on the NRHP are the Peace Arch Park at the US-Canada International Border and the *M.V. Plover* ferry. Table 4.8-5 lists the previously recorded archaeological sites in the Blaine study area; sites have not been evaluated for listing on the NRHP unless otherwise noted.

Table 4.8-5. Previously Recorded Archaeological Sites in the Blaine Study Area

Site No.	Name	Type	Time Period
45-WH-171	Si'ke Village Site/ Tsi'lich area	Shell Midden, village, lithics, human remains	Precontact/Historic
45-WH-25	--	Shell midden	Precontact
45-WH-46	--	Shell midden, lithics, historic button, glass fragments	Precontact/Historic
45-WH-48	--	Shell Midden, lithics, human remains	Precontact
45-WH-49	--	Shell midden, lithics, historic debris	Precontact
45-WH-58	Dakota Creek Fish Trap	Fish trap, habitation, lithics	Precontact
45-WH-73	--	Shell midden	Precontact
45-WH-211	Drayton Harbor Midden, No. 1	Shell midden, lithics	Precontact
45-WH-212	Drayton Harbor Midden, No. 2	Shell midden, lithics	Precontact
45-WH-213	Drayton Mill Company Dump Site	Historic debris	Historic
45-WH-215	<i>The March</i> shipwreck	c.1930s shipwreck	Historic
45-WH-216	Birch Point Cobble Tool Site 1	Lithic scatter, human remains	Precontact
45-WH-217	Birch Point Cobble Tool Site 2	Lithic scatter	Precontact
45-WH-219	Drayton Mill Bunkhouse	Historic debris	Historic
45-WH-221	Drayton Mill Company Pier Site	Historic structure (pier)	Historic
45-WH-537	--	Shell Midden, lithics, human remains	Precontact
45-WH-541	R.M. Petrie Site	Shell midden, lithics	Precontact

Site No.	Name	Type	Time Period
45-WH-547	--	Shell midden, Historic debris	Precontact/Historic
45-WH-563	--	Shipwreck	Historic
45-WH-599	--	Shell midden, lithics	Precontact
45-WH-657	--	Historic debris	Historic
45-WH-727	--	Lithic isolate	Precontact
45-WH-730	Semiahmoo Drive Modified Cobble Site	Lithic scatter	Precontact
45-WH-731	Fourcade Property Site	Shell midden	Precontact
45-WH-764	--	Shell midden	Precontact
45-WH-765	--	Shell midden	Precontact
45-WH-766	--	Shell midden	Precontact
45-WH-832	--	Lithic isolate	Precontact

¹ Determined eligible for listing on the NRHP.

Cherry Point Study Area

The Cherry Point study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole and its history is tied to Blaine, Birch Bay, and Bellingham. Cherry Point is in the traditional area of the Semiahmoo. Logging and fishing were early industries in Cherry Point, but the area did not see the urban growth in the late nineteenth to early twentieth centuries as other study areas in the EIS. Subsequently, there are few NRHP/WHR listed properties since most cultural resource information is determined through the development review process. Recorded archaeological sites tend to cluster around waterways and shorelines and consist of shell middens, lithic scatters, and historic debris/ structures. The Cherry Point Site (45-WH-1), the first officially recorded site in the County, is eligible for listing on the NRHP. Table 4.8-6 lists the previously recorded archaeological sites in the Cherry Point study area; sites have not been evaluated for listing on the NRHP unless otherwise noted.

Table 4.8-6. Previously Recorded Archaeological Sites in the Cherry Point Study Area

Site No.	Name	Type	Time Period
45-WH-1 ¹	Cherry Point Site	Shell midden, domestic structures, human remains, lithics	Precontact
45-WH-16	--	Ephemeral camp, lithics	Precontact
45-WH-23	Golgotha Church Site	Lithic scatter	Precontact
45-WH-52	--	Lithic scatter	Precontact
45-WH-83†	--	Lithic scatter	Precontact

Site No.	Name	Type	Time Period
45-WH-84†	--	Lithic scatter	Precontact
45-WH-523	Cherry Point Cobble Artifact Site	Lithic scatter	Precontact
45-WH-569	Grandview Farmstead Site	Historic debris	Historic
45-WH-574	Bliss Homestead	Historic debris, historic structures	Historic
45-WH-598	--	Lithic scatter	Precontact
45-WH-729	Lake Terrell Road Wetlands	Lithic scatter	Precontact

† Determined eligible for listing on the NRHP.

Columbia Valley Study Area

The Columbia Valley study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole. Columbia Valley is in the traditional area of the Nooksack. There are no previously recorded archaeological sites in the Columbia Valley study area. The Columbia Valley is in the traditional area of the Nooksack. The town of Kendall is located near the site of the historically known village Kw'éwle?xwi (Blukis Onat and Hollenbeck 1981) or xwk^wulex^wiy (Suttles 1990). Because of its interior location, the Columbia Valley study area was historically settled later than the other study areas. The first homesteads were granted in the 1890s. Logging was profitable for some time, but the area was rather inaccessible. This inaccessibility attracted outdoor enthusiasts from the nearby cities, which then led to an improvement of the transportation infrastructure. The Mount Baker Highway (State Route [SR] 542) was established in 1923 (Kirk and Alexander 1990).

There are no NHRP/WHP properties or previously recorded archaeological sites in the Columbia Valley study area.

Everson Study Area

The Everson study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole and its history is tied to the Nooksack. Loggers and farmers were among the first settlers of the Everson area; Ever Everson, a dairy farmer, was the first settler in 1871. The loggers cleared the land making way for farming operations, and after the trees were gone, the farmers stayed. Dairying was the primary occupation and the Nooksack Valley Condensed Milk Company was successful enough to warrant a buy-out by the competing Carnation Company in 1929. Everson was incorporated in 1929 (Roth 1926).

NRHP/WHR properties in the Everson study area are generally associated with rural activities, such as barns. One archaeological site, a lithic scatter, has been previously identified in the Everson study area (Table 4.8-7).

Table 4.8-7. Previously Recorded Archaeological Sites in the Everson Study Area

Site No.	Name	Type	Time Period
45-WH-53	--	Lithic scatter	Precontact

Notes = This site has not been evaluated for eligibility for listing on NRHP.

Ferndale Study Area

The Ferndale study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole and its history is tied to Bellingham and Blaine, as Ferndale lies between and is connected to these two communities. Ferndale is in the traditional territory of both the Lummi and Nooksack. A Nooksack village is reported at a prairie between Tennant Lake and Barrett Lake (Reid and Hale 2004). Ferndale was platted in 1883 and incorporated 1907 and named after surrounding ferns (once a staple of the Nooksack diet). The town was originally named “Jam” after a large log jam that tended to accumulate in a bend in the Nooksack River. The log jam was cleared in 1876 and 1877, which allowed ferry travel and encouraged more settlement (Reid and Hale 2004). The Great Northern Railway arrived in 1890 further encouraging settlement and growth. Like Bellingham, early industries included logging, fishing, and coal mining. Later, farming played an important role in the economy (Grabert 1983).

Geologically, Ferndale exists in an accretion area where few Precontact sites are expected to be found. However, Site 45-WH-34 has been dated to about 5,000 years ago (Hovezak and Hutchings 2005). Because of agricultural activities, the sites that do exist are subject to disturbance due to plowing activities (Williams 2005). Previously recorded archaeological sites tend to be shell middens and lithic scatters. NRHP/WHR properties in the Ferndale study area include Pioneer Park and structures associated with an early homestead family, the Hovanders. Table 4.8-8 lists the previously recorded archaeological sites in the Ferndale study area; sites have not been evaluated for listing on the NRHP unless otherwise noted.

Table 4.8-8. Previously Recorded Archaeological Sites in the Ferndale Study Area

Site No.	Name	Type	Time Period
45-WH-18	-	Lithic scatter	Precontact
45-WH-19	-	Lithic scatter	Precontact
45-WH-34	Skalaxen Village Site	Shell midden, lithics, possible camp or village	Precontact
45-WH-36	-	Lithic scatter	Precontact
45-WH-37	-	Lithic scatter	Precontact
45-WH-38	-	Lithic scatter	Precontact

Site No.	Name	Type	Time Period
45-WH-39	-	Lithic scatter	Precontact
45-WH-40	-	Lithic scatter	Precontact
45-WH-42	-	Shell midden, lithics, historic pipe fragment	Precontact/ Historic
45-WH-51	-	Lithic scatter	Precontact
45-WH-57	-	Lithic scatter	Precontact
45-WH-95	Hovander Farm Site	Lithic scatter	Precontact
45-WH-96	Halvorsen Site	Lithic scatter	Precontact
45-WH-723	Nooksack WRP Burial Site	Shell midden, human remains	Precontact
45-WH-734	Nooksack River Camp Site	Lithic scatter	Precontact
45-WH-737	East Ferndale Town Site	Historic debris, historic structures	Historic
45-WH-738	East Ferndale Shell Midden Site	Shell midden, lithics	Precontact
45-WH-748	-	Lithic isolate	Precontact
45-WH-774	Crown Court Lithic Site	Lithic Scatter	Precontact

Notes = Sites have not been evaluated for eligibility for listing on NRHP unless otherwise noted.

Lynden Study Area

The Lynden study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole. The Lynden study area is located within the traditional territory of the Nooksack. Two Nooksack villages are reported in the current vicinity of Lynden (Suttles 1990). Early Euro-American oral history of the Lynden reports that Lynden was built atop the village of Squa-ha-lish (Jeffcott 1949). The area was settled mainly by Northern European dairy farmers, with a large Dutch contingent. Logging and poultry farms were also early industries. Lynden was platted in 1874 by Holden and Phoebe Judson and incorporated in 1891. The downtown was built primarily in the 1910s through the 1920s and additional infrastructure was added as part of the 1930s Works Progress Administration (Koert 1989; Kolva and Franks 1989).

Previously recorded archaeological sites tend to be habitation sites and lithic scatters. NRHP/WHR properties include two barns and the Lynden post office. Table 4.8-9 lists the previously recorded archaeological sites in the Lynden study area; sites were not evaluated for NRHP listing unless otherwise noted.

Table 4.8-9. Previously Recorded Archaeological Sites in the Lynden Study Area

Site No.	Name	Type	Time Period
45-WH-2	--	Long house	Precontact
45-WH-7	--	House pits, lithics	Precontact

Site No.	Name	Type	Time Period
45-WH-8	--	Prehistoric	Precontact
45-WH-28	--	Lithic scatter	Precontact
45-WH-59	--	Lithic scatter	Precontact
45-WH-535	Kamm Creek Spring Site	Lithic scatter	Precontact

Notes = Sites have not been evaluated for eligibility for listing on NRHP unless otherwise noted.

Nooksack Study Area

The Nooksack study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole and its history is tied to that of Everson. Nooksack was established in 1885 by W.R. and Elizabeth Moutrey (Tremaine 1975) and has had a small population since the 1880s. It was incorporated in 1912, but the town burned soon thereafter, causing growth to stagnate.

One NRHP/WHR property and one archaeological site have been recorded in the Nooksack study area (Table 4.8-10).

Table 4.8-10. Previously Recorded Archaeological Sites in the Nooksack Study Area

Site No.	Name	Type	Time Period
45-WH-692	--	Lithic isolate	Precontact

Notes = This site has not been evaluated for eligibility for listing on NRHP.

Sumas Study Area

The Sumas study area (UGA and Suitability Analysis Study Area) has a similar prehistoric and ethnographic history as the County as a whole. It was originally established as a trading post in the 1850s and later grew as a result of its proximity to three railroad lines and the Canadian border crossing. After the Fraser Valley Gold Rush had subsided and the trees near Sumas were logged, dairy farming became the primary industry. Ansel Robert Johnson was the first homesteader in Sumas, who arrived in 1871 (Goetz Stutzman and Warner 1995). In 1889, Phillip Davies platted “Sumas City”; Johnson platted “Johnson’s Addition” in 1890 and “Johnson’s Second Addition” in 1891. Sumas was incorporated 1891 (Luttrell 2003). The Port of Sumas opened 1891 and was the main port of entry for Chinese and Indian laborers arriving in Vancouver, British Columbia, who were then sent to Sumas for processing. Later, Sumas became a haven for smugglers and bootleggers during the Prohibition (Franks 2000).

The border station in Sumas and a barn are on the NRHP/WHR. Archaeological sites tend to be lithic scatters, habitation sites, or historic debris. Table 4.8-11 lists the previously recorded archaeological sites in the Sumas study area; sites have not been evaluated for listing on the NRHP unless otherwise noted.

Table 4.8-11. Previously Recorded Archaeological Sites in the Sumas Study Area

Site No.	Name	Type	Time Period
45-WH-5	--	Occupation, hearth	Precontact
45-WH-6	--	House pits, lithics	Precontact
45-WH-85	--	Lithic scatter	Precontact
45-WH-86	--	Lithic scatter	Precontact
45-WH-87	--	Lithic scatter	Precontact
45-WH-405	Sumas River Crossing	Lithic scatter, historic debris scatter	Precontact/Historic
45-WH-471	Sumas Crossing Site	Lithic scatter	Precontact
45-WH-536 ¹	Sumas River Site	Lithic scatter	Precontact
45-WH-572	Sumas Trestle Site	Historic Structure (Railroad Trestle)	Historic
45-WH-573 ¹	South Sumas Road Site	Historic debris	Historic
45-WH-578 ¹	Telegraph Trail Site	Historic debris	Historic
45-WH-579 ¹	Easterbrook Grade Site	Historic debris	Historic

¹ Determined not eligible for listing on the NRHP.

Laws Protecting Cultural Resources

Development in the County is subject to federal, state, and local laws. Laws protecting cultural resources from disturbance or destruction operate on multiple levels.

Federal Laws

- The Archaeological Resource Protection Act (ARPA) of 1979 helps secure the protection of archaeological resources and sites that are on public and Indian lands and assists in sharing information among entities seeking to preserve these resources.
- The NHPA establishes national standards for designation of historic and culturally significant properties, including archaeological sites. In addition, this Act of Congress establishes the office of State Historic Preservation Officer (SHPO). Section 106 USC 470(a)(d) of this law establishes a program to assist Indian Tribes in preserving their particular historic properties.
- The Archaeological and Historic Preservation Act of 1974 governs archaeological and other historic and cultural resources found in federal construction activities.
- The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 governs the protection, preservation, and repatriation of Native American human remains, sacred objects, funerary objects, and items of cultural patrimony discovered on federal or Indian lands.

State Laws

- Governor's Executive Order 05-05 requires state agencies with capital improvement projects to integrate the DAHP, Governor's Office of Indian Affairs, and governments of concerned tribes into their capital planning process. This Executive Order affects any capital construction project and any land acquisitions for purposes of capital construction.
- RCW 27.44 Indian Graves and Records provides protection for Native American graves and burial grounds, encourages voluntary reporting of said sites when they are discovered, and mandates a penalty for disturbance or desecration of such sites.
- RCW 27.53 Archaeological Sites and Resources governs the protection and preservation of archaeological sites and resources and establishes DAHP as the administering agency for these regulations.
- RCW 68.60 Abandoned and Historic Cemeteries and Historic Graves provides for the protection and preservation of abandoned and historic cemeteries and historic graves.

Whatcom County Policies and Regulations

Whatcom County Comprehensive Plan Preservation Policies

Goals and policies in the Whatcom County Comprehensive Plan encourage a coordinated approach to the identification and preservation of significant cultural resources. The comprehensive plan and development regulation features that would serve to mitigate the impacts are listed below.

Goals

- **Goal 10E.** Recognize the County's historical and archaeological attributes and identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.

Policies

- **Policy 10E-1.** Whatcom County shall prepare a cultural resource inventory to identify and document archeological and historic resources.
- **Policy 10E-2.** The County's cultural resource inventory shall be updated on a continuing basis to ensure the inventory's usefulness as a historic preservation and land use tool.
- **Policy 10E-3.** The County's cultural resource inventory shall be coordinated with similar programs maintained by municipalities and indigenous people within the county to ensure the comprehensiveness of the inventory.
- **Policy 10E-4.** Consistent with its resources and based on the standards of the cultural resources inventory, the county shall provide technical assistance to local groups whose work can be incorporated into the county's inventory.
- **Policy 10E-5.** The County shall seek to preserve and enhance archeological, historic, and cultural resources by enacting a qualifying historic preservation ordinance and carrying out the mandates of that ordinance.

- **Policy 10E-6.** The County shall meet its cultural resource management obligation under federal, state, and local regulations in an efficient and effective manner.
- **Policy 10E-7.** Consistent with its resources, the County shall provide technical assistance on cultural resource matters.
- **Policy 10E-8.** The County shall promote preservation of identified archeological, historic, and cultural resources.
- **Policy 10E-9.** On projects under its authority, the County shall consistently seek to mitigate negative impacts to cultural resources.
- **Policy 10E-10.** The County shall undertake through a public/private partnership a coordinated long-range planning in conjunction with representatives of arts, heritage, and tourism organizations, to develop strategies for preserving and enhancing cultural resources.
- **Policy 10E-11.** The County shall continue to cooperate with cultural groups and the organized representatives of the tourism industry to promote cultural tourism and ensure that cultural tourism projects remain eligible for funding assistance through its hotel/motel tax fund program.

Whatcom County Regulations

The County has several regulations that govern the preservation and protection of cultural resources. In the County, the Department of Parks and Recreation is currently responsible for historic preservation.

4.8.2. Impacts

This Draft EIS analyzes the environmental impacts of four alternatives:

- **No Action Current Comprehensive Plan Alternative.** This alternative is a continuation of the County's current comprehensive plan and subarea plans.
- **No Action Trends Alternative.** This alternative assumes past growth continues forward.
- **Action Alternative X.** This alternative shifts growth from rural areas to UGAs, focusing on Bellingham.
- **Action Alternative Y.** This alternative shifts growth from rural areas to UGAs other than Bellingham.

Because the Draft EIS is a programmatic document that defines issues and sets forth development policy in broad terms rather than on a project- or site-specific basis, it reserves necessary site-specific analysis for future environmental analyses conducted for individual development proposal. Development assumptions at this stage are in terms of scenarios for set levels of potential development, as measured in expected population and employment increases and the amount of land likely required for new development.

The level of significance for an impact is dependent on the existing integrity and nature of contributing elements to a property’s historic or cultural significance, and the sensitivity of the current or historic use of the resource.

Impacts Common to All Alternatives

Cultural resources located in urban areas designated for residential, commercial, and industrial uses have the highest potential to come under development pressures and disturbed or converted to other uses. Cultural resources located in areas proposed for rural uses are subject to less developmental pressure; however, typical agricultural activities tend to destroy or disturb cultural resources. Typical project impacts that may disrupt or adversely impact cultural resources may include:

- demolition, removal, or substantial alteration without consideration of historic and archaeological sites and/or features;
- incompatible massing, size, scale, or architectural style of new development on adjacent properties;
- obstruction or extensive shading of significant views to and from a resource by new development;
- incompatible use of an existing building or structure;
- disruption of integrity of setting (e.g., by addition of modern structures to an historic homestead); and
- long-term loss of access to the property.

Development is expected in each UGA study area on vacant, partially developed and redeveloped sites, as shown in Table 4.8-12.

Table 4.8-12. Potential Additional Development in Urban Growth Areas by Alternative (Net Acres)

Study Area	No Action Current Comprehensive Plan Alternative			No Action Trends Alternative			Action Alternative X			Action Alternative Y		
	Resid Acres	Emp Acres	Total	Resid Acres	Emp Acres	Total	Resid Acres	Emp Acres	Total	Resid Acres	Emp Acres	Total
Bellingham	798	1,272	2,070	1,190	1,663	2,853	1,601	1,817	3,418	844	1,461	2,305
Birch Bay	338	0	338	342	0	342	331	0	331	648	77	725
Blaine	0	127	127	0	205	205	0	221	221	11	267	278
Cherry Point	0	547	547	0	750	750	0	837	837	0	642	642
Columbia Valley	113	4	117	394	4	398	106	4	110	317	40	357
Everson	81	50	131	53	81	134	133	87	220	154	105	259
Ferndale	271	197	468	301	405	706	498	444	942	539	515	1,054

Study Area	No Action Current Comprehensive Plan Alternative			No Action Trends Alternative			Action Alternative X			Action Alternative Y		
	Resid Acres	Emp Acres	Total	Resid Acres	Emp Acres	Total	Resid Acres	Emp Acres	Total	Resid Acres	Emp Acres	Total
Lynden	356	248	604	423	316	739	552	339	891	634	416	1,050
Nooksack	32	3	35	28	13	41	61	15	76	76	32	108
Sumas	34	27	61	78	32	110	54	35	89	111	39	150
Total Urban	2,023	2,475	4,498	2,809	3,469	6,278	3,336	3,799	7,135	3,334	3,594	6,928
Rural Growth	Low	Low	Low	High	High	High	Mod.	Mod.	Mod.	Mod-High	Mod-High	Mod-High

No Action Current Comprehensive Plan Alternative

The No Action Current Comprehensive Plan Alternative would retain the current Whatcom County Comprehensive Plan and development regulations. Within the UGAs, there would be a need for additional residential and employment land of up to 4,498 acres, and most of this would be required in the Bellingham, Lynden, Cherry Point, and Ferndale UGAs. None of the UGAs have undergone a comprehensive cultural resources inventory and undiscovered cultural resources may exist that have not been identified in these UGA study areas. However, high densities of cultural resources are located along the shorelines of Cherry Point and Bellingham Bay affecting Cherry Point, and Bellingham study areas.

Development under the No Action Current Comprehensive Plan Alternative could occur on or near parcels that presently contain identified cultural resources and could thus result in a substantial adverse affect in the significance of a cultural resource. Any future development project in the County Planning Area that would cause substantial adverse change to the significance, or potential significance, of a cultural resource would represent a significant impact to cultural resources.

No Action Trends Alternative

The No Action Trends Alternative assumes previous growth patterns would continue with the most growth allocated to Bellingham UGA and rural lands. Most of the 6,278 acres required for development in UGAs would occur in Bellingham, Lynden, Cherry Point, and Ferndale similar to the No Action Current Comprehensive Plan Alternative. Since No Action Trends Alternative assumes a higher overall growth level than the No Action Current Comprehensive Plan Alternative, the potential for impacts could be higher under the No Action Trends Alternative.

Action Alternative X

Action Alternative X shifts growth from rural areas to UGAs (7,135 acres of residential and employment land are anticipated for development under this

alternative), but focuses primarily on developing Bellingham. Bellingham is the largest urban area in the County and has the highest number of NRHP structures. Bellingham also has a large number of prehistoric archaeological sites, some of which have previously produced human remains. The likelihood of development impacting previously recorded cultural resources is higher in Bellingham than other UGAs. Bellingham and its UGA have not undergone a comprehensive cultural resources inventory and undiscovered cultural resources may exist that have not been identified in this UGA study area. Other UGAs with substantial acres of residential and commercial development include Lynden, Cherry Point, and Ferndale. Action Alternative X represents the most acres of development proposed for Cherry Point. None of the UGAs have undergone a comprehensive cultural resources inventory and undiscovered cultural resources may exist that have not been identified in these UGA study areas. However, high densities of cultural resources are located along the shorelines of Cherry Point and Bellingham Bay affecting Cherry Point, and Bellingham study areas.

Development under Action Alternative X could occur on or near parcels that presently contain identified cultural resources and could thus result in a substantial adverse affect in the significance of a cultural resource. Any future development project within the County Planning Area that would cause substantial adverse change to the significance, or potential significance, of a cultural resource would represent a significant impact to cultural resources.

Action Alternative Y

Development of residential and employment lands (6,928 acres) would be spread across the UGAs. Action Alternative Y shifts growth from rural areas to UGAs other than Bellingham. Columbia Valley, Sumas, Nooksack, Everson, Ferndale, and Lynden have lower densities of identified cultural resources than seen in Birch Bay, Cherry Point, Blaine and Bellingham. However, none of the UGAs have undergone a comprehensive cultural resources inventory and undiscovered cultural resources may exist that have not been identified in these UGA study areas. High densities of cultural resources are located along the shorelines of Drayton Harbor, Birch Bay, Cherry Point, and Bellingham Bay affecting the Blaine, Birch Bay, Cherry Point, and Bellingham study areas.

Development under Action Alternative Y could occur on or near parcels that presently contain identified cultural resources and could thus result in a substantial adverse affect in the significance of a cultural resource. Any future development project in the County Planning Area that would cause substantial adverse change to the significance, or potential significance, of a cultural resource would represent a significant impact to cultural resources.

4.8.3. Mitigation Measures

Incorporated Plan Features

See Section 4.8.1 for a list of current comprehensive plan policies.

Applicable Regulations and Commitments

See Section 4.8.1 for national, state, and local laws regarding cultural resource management.

Other Potential Mitigation Measures

A policy or program could be developed to promote improved ongoing communication and coordination strategies with local Native American communities and other interested parties in an effort to better preserve and enhance cultural resources. Further amendments to the building and zoning codes could be considered that provide forms of assistance to developers and property owners to preserve significant cultural resources.

The following mitigation measures are recommended for all future development projects in the County Planning Area that are located on or in proximity to properties containing known archaeological and historic resources:

1. To the extent feasible, the preservation, rehabilitation, restoration, reconstruction or adaptive reuse of historic resources shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation. Any proposal to preserve, rehabilitate, restore, reconstruct, or adaptively reuse a historic resource in accordance with the Interior Secretary's Standards shall be deemed to not be a significant impact under the State Environmental Policy Act (SEPA) and, in such cases, no additional mitigation measures will be required.
2. In the event that a future development project in the County Planning Area is proposed on or immediately surrounding a site containing a historic resource, environmental review of the development project shall consider the impacts to the historic resource and, if needed, shall include a study conducted by a qualified historian, architectural historian, or archaeologist (depending on the nature of the resource) to determine whether the proposed development project would materially alter in an adverse manner those physical characteristics of the historic resource that conveys its historical significance. If the project would demolish a historic resource or if it is determined that the development project would materially alter in an adverse manner those physical characteristics that convey the resource's historic significance, the County shall impose any and all measures to avoid or substantially lessen the impact, unless the County, after having analyzed the significant impacts and proposed mitigation measures finds such mitigation measures are infeasible. Potential modifications to a site-specific

development project to avoid or mitigate adverse impacts on historic resources include, but are not limited to:

- a. site plan modifications that incorporate the historic resource into the proposed project, and if necessary, rehabilitation of the historic resource; rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation;
 - b. design changes related to height density, upper story step-backs, architectural features, or materials; and
 - c. changes in the proposed development program to include compatible uses.
3. In the event that a future development project in the County Planning Area is proposed on a site containing a previously unknown historic resource that is not documented in the NRHP or WHR, the County shall require, as part of the environmental review of the project, an intensive-level assessment of the property by a qualified historian or architectural historian to determine whether it is a historic resource under SEPA. If the intensive-level survey determines that the property is a historic resource, the County shall undertake the analysis and impose mitigation measures as outlined in this section.
 4. In addition to the archaeological resources already known to exist in the County Planning Area, it is possible that intact buried deposits remain in areas not yet tested. Archaeological testing and, if necessary, data recovery must be completed for proposed projects that involve significant excavation and any changes made to the vegetation and landforms within the County Planning Area, particularly those near existing waterways. Archaeological monitoring is suggested for subsurface excavation and construction in high probability areas.
 5. In the event that a future development project within the County Planning Area is proposed on or immediately surrounding a site containing an archaeological resource, environmental review of the development project shall consider the impacts to the archaeological resource and, if needed, shall include a study conducted by a qualified archaeologist to determine whether the proposed development project would materially impact the archaeological resource. If the project would disturb an archaeological resource, the County shall impose any and all measures to avoid or substantially lessen the impact. If avoidance of the archaeological resource is not possible, an appropriate research design must be developed and implemented with full data recovery of the archaeological resource prior to the development project.
 6. Avoiding cultural resources through the selection of other project alternatives and changes in design of project features in the specific area of the affected resource(s) could eliminate the need for measuring impacts.
 7. Non-site-specific mitigation could involve finding other opportunities in the community for mitigation measures that are not specific to the impacted site(s).

Some of the options for non-site-specific mitigation include developing an educational program, interpretive displays, design guidelines that focus on compatible materials, and professional publications.

4.8.4. Significant Unavoidable Adverse Impacts

Future growth and development in the County will increase pressure for the redevelopment of significant cultural resources. Future development activities could disturb or destroy cultural resources, those known and unknown. Consistent application of federal, state, and local laws should reduce the potential for impacts on cultural resources.