



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

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April 28, 2010

Mr. Tyler Schroeder
Current Planning Supervisor
Whatcom County
5280 Northwest Drive
Bellingham, WA 98226

In future correspondence please refer to:

Log: 042810-39-WH

Property: Lily Point, LLC and Cassimar US, Inc. Preliminary Plat Approval DNS, SEP2007-00074

Re: Review Comments

Dear Mr. Schroeder:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer. We have also reviewed the 2007 cultural resources report by ECRI, Inc. entitled *Archaeological Investigation Report: Parcel 405311506427, 405312065477, 405312014420 APA Roads (Pauls road and Claire Lane) Point Roberts, Washington*. ECRI recommended, in addition to other recommendations, that the :

1. **the final development plans be reviewed by a professional and qualified archaeologist to confirm that the testing program carried out in the survey was adequate for the proposed development.**

As you are aware, Point Roberts is a very archaeologically sensitive area containing documented precontact archaeological resources and human remains. We agree that once plans are finalized they should be reviewed by a professional archaeologist in tandem with the above report. Further archaeological survey may be necessary in some areas.

2. **Recommendations 3, 4, and 5 deal with training and inadvertent discoveries of archaeological training of construction workers, inadvertent discoveries of archaeological resources and human remains.**

We agree with training construction personnel about the sensitivity of archaeological resources familiarizing them with inadvertent discovery procedures. This should be done by a professional archaeologist prior to construction. The Inadvertent Discovery Plan attached to the report requires updating to comply with current state laws governing the protection and procedures for dealing with human remains.



In addition, at least 8 houses or house foundations were observed, four of which were still standing. The report recommends that one of the houses or remnants were eligible for the National Register of Historic Places (NRHP). Four of the houses are still standing. No information was provided regarding the age of the resources, nor were the standing house evaluated for eligibility by someone meeting the Secretary of Interior standards for historic architecture, architectural history, or history. The houses that are standing should be recorded on Historic Property Inventory forms and evaluated for listing on the NRHP and Washington Heritage Register (WHR). Historic house may also have historic archaeological resources associated with them in the immediate vicinity. The house sites where buildings are no longer extant may have historic archaeological value. There is no discussion what the house were used for. For example, were they associated with worker housing for the Lilly Point Cannery?

Please be aware that under RCW 27.53 all precontact resources are protected from disturbance. Historic archaeological resources are protected from disturbance if they are determined eligible for the NRHP. The determination must be made by DAHP based on information and recommendations usually provide by a consultant. Until that determination is made, historic archaeological resources are protected from disturbance under state law.

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

Sincerely,



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CC. Lena Tso, THPO, Lummi Tribe
George Swanaset Jr., THPO, Nooksack Tribe
Kelly Bush, Archaeologist, ECRI, Inc.