



Cultural Resources Comprehensive Plan

Staff Report - **Draft Document**



PLANNING & PUBLIC
WORKS

Cultural Resources Element Staff Report

Executive Summary

The Cultural Resources Element update has three [scope of work](#) tasks, which aim to improve the County's identification of cultural resources and the strategies used to preserve those resources. Doing so improves tribal relations, preserves local culture, and celebrates the diverse histories and identities of Pierce County's community members. The policy updates provide consistency with the Washington State Growth Management Act (GMA), the Puget Sound Regions Council (PSRC) *Vision 2050*, and the Countywide Planning Policies.

What Are the Proposed Changes?

The proposed changes aim to preserve cultural resources, and were developed with input from the Muckleshoot, Nisqually, Puyallup, and Squaxin Island Tribes, as well as County subject matter experts.

Mapping

Mapping of cultural resources is intended to facilitate preservation of those resources. However, tribal representatives stated that they are not comfortable sharing the locations of known tribal cultural resources due to the sensitive nature of these sites, and past and current issues of desecration and removal of these resources. The County shall coordinate with available state resources and Tribal Historic Preservation Officers (THPOs) to identify cultural resources that may be impacted during the project review process.

Tribal Resources

Policy and context section updates refine the definition of cultural resources and the ecosystems that tribal practices and identity depend on. Clarifications of how and when to coordinate with tribes have been added. This provides consistency with new state legislative requirements, *Vision 2050* and the Countywide Planning Policies.

Climate Change

Climate change impacts historic structures, tribal treaty rights, and the natural resources that form cultural practices. New policies have been added to recognize adaptation approaches to protect cultural resources.

Non-tangible cultural resources include traditions and living expressions inherited from tribal ancestors, such as performances, rituals, festivals, and knowledge of nature, the universe, or crafting practices.

Introduction

The Cultural Resources element addresses the wealth of cultural and historic resources in Pierce County. Like natural resources, historical, archeological, and tribal landscapes are resources that require protection to ensure the continuation of Pierce County's identity and to provide residents a sense of place.

This update integrates greater recognition of the role and value that the Coast Salish peoples have in Pierce County's identity. Care must be taken as to how details regarding tribal Cultural resources are published. Due to past acts of theft and vandalism, exact locations of all cultural resources are not publicly available. The Washington State Department of Archaeology and Historic Preservation (DAHP) and the Washington Information System for Architectural and Archeological Records Data (WISAARD) contains some information but not all. Given that not all cultural resources are mapped and that the level of risk or probability that cultural resource may exist on a site may not always be known, the County should consult with Tribal Historic Preservation Officers (THPOs) when reviewing proposed actions.

Climate change can impact unique and nonrenewable cultural resources. New policies based on the Climate Risk and Vulnerability Assessment have been added to protect cultural resources from increasing climate hazards. Context sections in this element have been updated to reflect a broader definition of cultural resources.

Scope of the Review

The proposed updates to the Comprehensive Plan are based on an audit of the plan using the Washington State Department of Commerce checklist, HB 1717, the PSRC *Vision 2050* checklist, review of the Countywide Planning Policies, interdepartmental review by staff, and public input received during September 2022. This resulted in a [scope of work](#) that is summarized below for this element.

Issue	Reason for Inclusion	Page
22. Mapping - map historic and cultural resources. Update the County's historical resources map(s).	Countywide Planning Policies require maps of historic and cultural resources.	3
23. Tribal Resources – mention tribal treaty hunting and fishing grounds, visual, and cultural resources to the protection policies	<p>Changes in the Growth Management Act require tribal participation in planning.</p> <p>Consistency with <i>Vision 2050</i> and Countywide Planning Policies, which direct jurisdictions to coordinate with tribal representatives, and incorporate ways to preserve tribal treaty rights.</p> <p>HB 1717 provides guidance on coordination procedures.</p>	4
24. Climate Change - acknowledge potential impacts to historic and cultural resources due to climate change	Council Resolution 2022-77 directed staff to address climate change and environmental resiliency in all elements of the Comprehensive Plan.	5
Consistency with department practice	Some policies in this element were amended for consistency with implementing code.	6

Issue Review

This section addresses each of the issues in the above scope of work, including a policy analysis. Portions of the text and the footnotes will refer to policy and other documents. They are provided below for easy reference.

- Growth Management Act (GMA) – [RCW 36.70A](#) and [WAC 365-196](#)
- Vision 2050 – [Multi-County Planning Policies \(MPP\)](#)
- Pierce County [Countywide Planning Policies \(CPPs\)](#)
- Existing Pierce County [Comprehensive Plan with Community Plans](#)
- [Pierce County Code \(PCC\)](#)

22. Mapping

CPP policy HAC-3.4 supports the mapping of cultural resources to facilitate their preservation, but it can also lead to mistreatment of those resources. During March 2023, the County met with representatives from the Muckleshoot, Nisqually, Puyallup, and Squaxin Island Tribes to discuss mapping and protecting cultural resources. Following the Tribes’ input, the County will not map the exact locations of cultural resources and rely on DAHP WISAARD and coordination with Tribal Historic Preservation Officers (THPOs).

Policy Changes

New text has been added to the Cultural Resources introduction that acknowledges tribal cultural resources throughout the County, use of available state mapping databases and coordination with THPOs.

Introductory language has been updated to be more inclusive of sacred landscapes and spiritual sites. There are no necessary changes to the Cultural Resources policies and no conflicts with community plans policies.

Equity Analysis

Although mapping can help recognize and protect resources, tribal members stand to be negatively impacted if exact locations of their sacred and cultural sites are publicized. In the past, publicly identified tribal cultural sites have been vandalized and pillaged. County Staff collaborated with tribal representatives and respect the omission of detailed inventory maps and rely on existing DAHP WISAARD predictive model and coordination with THPOs. Although there were no policy changes regarding mapping, ensuring that impacted stakeholders had the opportunity to participate in decision making has a positive impact on accessibility. Additionally, by including DAHPs publicly available WISAARD model as part of County online resources such as GIS and About My Property will improve awareness of these resources prior to property acquisition and during permitting review.

23. Tribal Resources

This section addresses coordination with tribes. The creation of this new section is partly in response to [Substitute House Bill 1717](#) (SHB 1717)¹ which amends the Growth Management Act to include new requirements for coordinating planning efforts with tribes. Following policies from the CPPs and new guidance from discussion with tribal representatives, new policy language has been added to guide the ongoing development of a department procedure and future code revisions which will clarify when a cultural resources survey is required for development projects.

Policy Changes

Tribal representatives are not comfortable sharing locations of tribal cultural resources, and many remain unmapped. New policy has been added to outline coordination with THPOs regarding potential development impacts on cultural resources.² Additional details will be established through code amendments currently under development in coordination with tribal representatives to define the criteria for requiring cultural surveys.

These policies do not vary with EIS alternatives. These policies potentially conflict with two community plans: the Anderson-Ketron Islands Community Plan and the Graham Community Plan. Both plans contain policies that discourage themed communities, but do

¹ Substitute House Bill 1717 requires counties and cities to allow tribal participation in the Comprehensive Plan planning process.

² NEW CR-2A, -2A.1, -2A.2, -2A.3, -2A.4, -2A.5.

not define what a themed community is.³ This lack of a clear definition leaves a potential conflict with preserving and showing tribal cultural resources, if any tribe is considered a themed community.

Equity Analysis

Tribal members have been negatively impacted by County decisions to allow projects on sites containing irreplaceable cultural resources. Considering this and SHB 1717, County staff hosted a series of meetings with tribal representatives regarding policies that may impact their nations. The work of establishing clear policies for tribal coordination has a positive impact on accessibility by ensuring that impacted stakeholders had the opportunity to participate in decision making. Successful preservation of these resources also offers education and economic benefits to those that get to experience the cultural resources, including both tribes and tourists.

24. Climate Change

Council Resolution 2022-77 directs staff to consider climate change, climate mitigation, and environmental resiliency in all elements of the comprehensive plan. This relates to cultural resources in two ways: preservation of resources that are threatened by climate change, and protection of ecosystems that tribal practices depend on.

Policy Changes

The existing sustainability subsection has been reframed as sustainability and climate change. Context has been added to describe the additional challenges that climate change brings to protecting cultural resources, which were identified in the [Climate Vulnerability Assessment \(CVA\)](#).

The CVA identified adaptation strategies to mediate climate impacts on historic structures and cultural practices.⁴ These strategies are regional best practices that were tailored to Pierce County by the Interdepartmental team and tribal representatives. This resulted in a new goal and two policies regarding climate adaptation strategies for cultural resources.⁵ This includes a policy that recognizes tribal treaty rights could be adversely affected by climate change, including salmon and steelhead fisheries,⁶ which are tied to tribal cultural practices⁷.

Equity Analysis

Climate change threatens natural resources that are key to tribal identity, and which tribal members rely on for cultural identity, food, and medicine. Preliminary draft policies were shared with tribal representatives for their review and no comments were received. The policy changes support tribal treaty rights in the face of climate change impacts. This helps

³ AK CR-1.2, GR CR-1.4

⁴ [Climate Element Planning Guidance](#): Washington Department of Commerce, 2023.

⁵ NEW CR-6A, -6A.1, -6A.2

⁶ [Puyallup Climate Change Impact Assessment](#)

⁷ CR-6A.1

improve accessibility by protecting the rights of tribal members to access resources required and desired for daily life and participation in society. The new policies also improve environmental health by ensuring tribal members benefit from safe and clean natural resources. Livability may be improved through promoting a clean, healthy community, and there are economic benefits from protecting fishing and aquaculture jobs.

The new policies aim to preserve registered historic structures in the face of rising rates of climate disasters. This new policy may support livability by preserving sites that are central to a community's identity and it could also help promote economy, by preserving landmarks.

Consistency with Department Practice

Some policies in this element were amended for consistency with implementing code. These types of minor changes make the element more effective overall at implementing Pierce County's vision for the Cultural Resources Element.

Policy Changes

The County's annual historic preservation grant program considers both preservation of historic structures and cultural resource protections. Context and policy language was amended to distinguish between historic preservation projects, which focus on preservation and conservation of usable built structures, and cultural resource preservation.⁸ Policy language which specified the names of specific funding sources and historic registrars were amended to be more general, to provide flexibility for the County to pursue additional cultural resource protection methods.⁹

Equity Analysis

These amendments align policy guidance with existing implementing regulations. They are primarily administrative changes which are not expected to have equity implications.

Implementation

<i>Implementation Method</i>	<i>Description</i>
<i>Code Update</i>	<ul style="list-style-type: none">• <i>Tribal Cultural Resources:</i> Update County code to protect cultural resources through development application review.• <i>Climate Change:</i> Consider additional funding for cultural resource preservation or climate-specific funding to the historic preservation fund (PCC 4.48.020).
<i>Program Administration</i>	<ul style="list-style-type: none">• <i>Mapping:</i> Integrate available data on sites that are likely to contain cultural resources from the DAHP WISAARD model into County online resources such as GIS and About My Property.

⁸ Goal CR-1, CR-1.1

⁹ CR-3.8, CR-3.10, CR-4.2

<p><i>Program Administration</i></p>	<ul style="list-style-type: none"> • <i>Tribal Cultural Resources:</i> Establish a predictable application review process for development. • <i>Tribal Cultural Resources:</i> Clarify when a cultural survey prepared by a qualified professional is required for permit applicants. • <i>Consistency with Department Practice:</i> The County's 'Cultural Resource Inventory' GIS layer of historic and cultural interest points was compiled in 2002. It should be updated, including integrating available state and tribal data.
<p><i>External Coordination</i></p>	<ul style="list-style-type: none"> • <i>Tribal Cultural Resources:</i> Coordinate with tribal representatives to establish appropriate protocols for notification of development proposals that have a high risk or probability of cultural resources. • <i>Climate Change:</i> Identify potential grants that could fund retrofits to improve the climate resilience of historic sites.
<p><i>Community Plan Update</i></p>	<ul style="list-style-type: none"> • <i>Tribal Cultural Resources:</i> Remove policies relating to themed communities from the Anderson-Ketron Island community plan. • <i>Tribal Cultural Resources:</i> Remove policies relating to themed communities from the Graham community plan.

Attachments

- [Pierce County Climate Vulnerability Assessment](#): Environmental Science Associates and BERK Consulting; 2023.
- [Climate Element Planning Guidance](#): Washington Department of Commerce, 2023.
- [Puyallup Climate Change Impact Assessment](#)
- [Substitute House Bill 1717](#) requires counties and cities to allow tribal participation in 214th the Comprehensive Plan planning process.