

Attachment D Cultural Resources



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

August 4, 2016

Ms. Margaret Berger
Archaeologist
Cultural Resource Consultants, Inc.
197 Parfitt Way SW, Suite 100
P.O. Box 10668
Bainbridge Island, WA 98110

In future correspondence please refer to:
Project Tracking Code: 2016-07-05037
Property: Renton Housing Authority 2016 Capital Facility Program
Re: No Historic Properties Affected

Dear Ms. Berger:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) on behalf of the Renton Housing Authority regarding the above referenced proposal. Your communication on this action has been reviewed by Dr. Rob Whitlam and myself on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

First, we agree with the project area of potential effect (APE) as mapped in your documentation. We also concur that no historic properties will be affected by the current project as proposed. As a result of our concurrence, further contact with DAHP on this proposal is not necessary. However, if new information about affected resources becomes available and/or the project scope of work changes significantly, please resume consultation as our assessment may be revised. Also, if any archaeological resources are uncovered during construction, please halt work immediately in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov





Cultural Resource Consultants

TECHNICAL MEMO 1605M-2

DATE: August 4, 2016

TO: Lisa Grueter
Berk Consulting

FROM: Margaret Berger, Principal Investigator/Project Archaeologist

RE: Cultural Resources Assessment for the Renton Housing Authority 2016 Capital Facility Program, Renton, King County, WA

The attached short report form constitutes our final report for the above referenced project. No further archaeological evaluation is recommended. One previously unrecorded historic site was identified and recorded but is recommended not eligible for the NRHP. No further historical evaluation is recommended. Please contact our office should you have any questions about our findings and/or recommendations.

CULTURAL RESOURCES REPORT COVER SHEET

Author: Margaret Berger

Title of Report: Cultural Resources Assessment for the Renton Housing Authority
2016 Capital Facility Program, Renton, King County, WA

Date of Report: August 4, 2016

County(ies): King Section(s): 4 & 16 Township: 23 N Range: 05 E

Quad: Bellevue South, WA and Renton, WA Acres: < 1

PDF of report submitted (REQUIRED) Yes

Historic Property Inventory Forms to be Approved Online? Yes No

Archaeological Site(s)/Isolate(s) Found or Amended? Yes No

TCP(s) found? Yes No

Replace a draft? Yes No

Satisfy a DAHP Archaeological Excavation Permit requirement? Yes # No

Were Human Remains Found? Yes DAHP Case # No

DAHP Archaeological Site #:

- Submission of PDFs is required.
- Please be sure that any PDF submitted to DAHP has its cover sheet, figures, graphics, appendices, attachments, correspondence, etc., compiled into one single PDF file.
- Please check that the PDF displays correctly when opened.

Management Summary

This report describes a cultural resources assessment for the Renton Housing Authority 2016 Capital Facility Program, in Renton, King County, Washington. The project involves proposed interior and exterior improvements at Renton Housing Authority public housing facilities. This assessment was developed to identify any previously recorded archaeological or historic sites in the project location and evaluate the potential for the project to affect historic properties. Cultural Resource Consultants, LLC (CRC) has conducted background research to identify any recorded archaeological or historic sites within the project and to assess the potential for as-yet unrecorded historic properties to be present. The project is considered to have a very low potential to affect archaeological sites. One property over 45 years in age (Evergreen Terrace) was identified; a historic property inventory form (HPI) was completed and reviewed by the Washington Department of Archaeology and Historic Preservation (DAHP). The property is not considered eligible for the National Register of Historic Places (NRHP). No further work is recommended.

1. Administrative Data

Report Title: Cultural Resources Assessment for the Renton Housing Authority 2016 Capital Facility Program, Renton, King County, WA

Author (s): Margaret Berger

Report Date: August 4, 2016

Project Background: Berk Consulting requested a cultural resources assessment on behalf of Renton Housing Authority. Renton Housing Authority is planning for capital projects at Cole Manor (built 1981), Evergreen Terrace (built 1968), Hillcrest Terrace (built 1962-63), and the Sunset Terrace redevelopment site that will receive federal funding from the Department of Housing and Urban Development (HUD). This federal undertaking must comply with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). It is CRC's understanding that specific locations of site improvements, sidewalk, and fencing at Cole Manor, Evergreen Terrace, and Hillcrest Terrace are yet to be determined.

At Hillcrest Terrace, proposed work includes:

Site improvement:

- 2016: Garbage recycling station: The station has been constructed as of March 2016 in correlation with preceding budget requests. As it was not part of its own environmental clearance, it is addressed in this assessment.
- 2017 – 2020: Americans with Disability Act (ADA) access upgrades. These may include: Possible replacement of current failing sidewalks, extra ADA curb cuts, and possible ADA mail box areas. Depending on the length and amount of ground disturbance, the activity may be considered categorically excluded or subject to an environmental assessment. In any case, it is programmatically addressed in this assessment.

Dwelling Structures:

- 2016: Shop building modernization. Utilize old laundry/office/foyer area for maintenance storage and work space. Some of the work may be considered rehabilitation and categorically excluded; however, it is encompassed in the current assessment.
- 2016-2017: Interior repairs including paint, flooring, cabinets, fixtures. Paint type is anticipated to be latex base paint. The work includes a mix of maintenance and rehabilitation, which are exempt or categorically excluded, respectively. Asbestos abatement of flooring and base adhesives by contractors at the time of vacant unit renovation work.

Dwelling Equipment:

- 2016-2020: Replace appliances and hot water heaters. These are considered exempt maintenance.

At Evergreen Terrace, proposed work includes:

Site improvement:

- 2017 – 2020: ADA access upgrades. Possible replacement of current failing sidewalks, extra ADA curb cuts, and possible ADA mail box areas as well as improvements in the common laundry room area. Depending on the length and amount of ground disturbance, the activity may be considered categorically excluded or subject to an environmental assessment. In any case, it is programmatically addressed in the environmental assessment.

Dwelling Structures:

- 2016-2017: Interior repairs including paint, flooring, cabinets, and fixtures. The work includes a mix of maintenance and rehabilitation, which are exempt or categorically excluded, respectively. Asbestos abatement of flooring and base adhesives by contractors at the time of vacant unit renovation work.

Dwelling Equipment:

- 2016-2020: Replace appliances and hot water heaters. These are considered exempt maintenance.

At Cole Manor, proposed work includes:

Site improvement:

- 2016: Perimeter fence replacement and sidewalk work. Perimeter fence replacement may exceed one cubic foot soil disturbance as new post holes may be required to be dug for fence post placement. Sidewalk work includes replacing current damaged sidewalks with new.
- 2017 – 2020: ADA access upgrades include ADA curb cuts, dumpster locations, and common laundry room area. Depending on the length and amount of ground disturbance, the activity may be considered categorically excluded or subject to an environmental assessment. In any case, it is programmatically addressed in the environmental assessment.

Dwelling Structures:

- 2016: Replace exterior siding with new siding material (Hardy-Plank type siding); old material to be removed by contractor for disposal. Activities are rehabilitation in nature, and categorically excluded, but addressed in the environmental assessment.

- 2016-2017: Interior repairs: paint, flooring, cabinets, fixtures. Paint is anticipated to be latex based paint. Cabinet replacement would occur as needed; floors to be replaced. No asbestos containing materials have been identified. Activities are a mix of maintenance and rehabilitation, which are exempt or categorically excluded, respectively; however, the activities are programmatically addressed in the environmental assessment.

Dwelling Equipment:

- 2016-2020: Replace appliances and hot water heaters. These are considered exempt maintenance but are programmatically addressed in the environmental assessment.

The 2016 Capital Facility Program also includes development planning and design of replacement units at Sunset Terrace, but effects to cultural resources were evaluated in the following NEPA studies:

- CH2MHill and ICF International. 2011. Sunset Area Community Planned Action NEPA/SEPA Environmental Impact Statement. Final. April. (ICF 00593.10.) Bellevue and Seattle, WA. Prepared for City of Renton and the Renton Housing Authority, Renton, WA.
- Reevaluation / Addendum, Renton Sunset Terrace Redevelopment 2014, Prepared By: BERK Consulting in association with CH2MHill, Mithun, and Weinman Consulting LLC
- Reevaluation / Addendum Renton Sunset Terrace Redevelopment 2016, Prepared By: BERK Consulting in association with CH2MHill, CRC, Mithun, Perteet, and Weinman Consulting LLC

Additional assessment at Sunset Terrace is not needed at this time to meet compliance with Section 106 and NEPA. As a result, Sunset Terrace is not included in the analysis presented in this report.

It is CRC's understanding that Hillcrest Terrace was previously evaluated for historical significance and determined not eligible for the NRHP. No further historical built environment investigations are needed for Hillcrest, nor are historical built environment investigations needed at Cole Manor due to its age. DAHP requested information about Evergreen Terrace to determine whether further historical evaluation and assessment of potential effects to historic properties at Evergreen Terrace would be needed.

Location: This assessment addresses proposed work at three Renton Housing Authority Subsidized and Senior Housing properties in the City of Renton, Washington 98056 (Figures 1 – 4). The physical addresses are as follows:

- Cole Manor, 2811 NE 4th Street;
- Evergreen Terrace, 3027 NE 15th Street; and
- Hillcrest Terrace, 1442 Hillcrest Lane NE.

Cole Manor is located in the NW¹/₄ of the NW¹/₄ of Section 16, and Hillcrest Terrace and Evergreen Terrace are in the E¹/₂ of the SW¹/₄ of Section 4, T. 23 N., R. 5 E., W.M.

USGS 7.5' Topographic Map (s): Bellevue South, WA (1983) and Renton, WA (1994) (see Figure 1).

Total Area Involved: Total acreage of the properties is 9.66 acres, but a much smaller area (< 1 acre) is involved in potential ground disturbance.

Recorded Cultural Resources Present: Yes No

The Hillcrest Terrace Public Housing Complex was recorded as a historic site, evaluated for significance, and was determined not eligible for the NRHP in 2011 (Hetzl 2010; reference #091010-31-HUD-CDBG). No other recorded archaeological or historic sites are within the project.

Objective (Research Design): This assessment was developed as a component of preconstruction environmental review with the goal of ensuring that no cultural resources are disturbed by the proposed project. CRC's work was intended, in part, to assist in addressing agency responsibilities regarding the identification of potential effects to historic properties in accordance with NEPA, Section 106 of the NHPA of 1966, as amended, and implementing regulations (36CFR800), and state laws and regulations protecting cultural resources (e.g., RCW 27.44, RCW 27.53). The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly disturbing archaeological sites without a permit from DAHP, and the Indian Graves and Records Act (RCW 27.44) prohibits knowingly disturbing Native American or historic graves. Under NEPA, agencies must consider the environmental consequences of a proposal, including impacts to cultural resources, before taking action. Under Section 106, agencies involved in a federal undertaking must take into account the undertaking's potential effects to historic properties (36 CFR 800.16(l)(1)).

Assessment methods consisted of review of available project information provided by Berk Consulting, local environmental, cultural, and historical information, and records on file at DAHP. CRC also contacted the cultural resources department at the Duwamish, Muckleshoot, and Snoqualmie tribes to inquire about project-related cultural information or concerns (Attachment A). At the time this assessment was completed, no response had been received. If new information is provided, it would be incorporated into a revision of this document. This assessment utilized a research design that considered previous studies, the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects (APE), as well as other applicable laws, standards, and guidelines (per 36CFR800.4 (b)(1)) (DAHP 2015).

2. Background Research

Background research was conducted in July 2016.

Archival Sources Checked:

DAHP WISAARD	<input checked="" type="checkbox"/> Recorded archaeological sites are located well outside the project. Hillcrest Public Housing Complex was previously recorded and determined not eligible for the NRHP.
Web Soil Survey	<input checked="" type="checkbox"/> The soil units mapped in the project location are Arents, Everett material; Arents, Alderwood material, 6 to 15 percent slopes; and Indianola loamy sand. 5 to 15 percent slopes (USDA NRCS 2016).
Library	<input checked="" type="checkbox"/> Various historical, archaeological, and ethnographic references in the Seattle Public Library and in CRC's library.

Context Overview: Environmental and cultural context information for this project is derived from relevant published reports, articles, and books (e.g., Marino 1990; Nelson 1990; Suttles and Lane 1990); historical maps and documents (e.g., USSG 1865); geological and soils surveys (e.g., USDA NRCS 2016; WA DNR 2016); ethnographic accounts (e.g., Waterman ca. 1920, 1922, 2001); and archaeological reports (e.g., Elder et al. 2010; Stevenson et al. 2011) in the local area. The following discussion of project area geology, archaeology, history, and ethnography incorporates context information from CRC's prior work in the Renton area by reference (e.g., Berger 2007, 2009; Schumacher 2015).

Environmental Context: The project is geographically situated within the Willamette-Puget Lowland physiographic province. This province is characterized by the wide "trough" between the Coast and Cascade Ranges formed during the advance and retreat of Pleistocene epoch glaciers (McKee 1972:290). The project is in the *Tsuga heterophylla* vegetation zone (Franklin and Dyrness 1973) in the Lake Washington/Cedar River Watershed. The project is situated on a terrace above the southeast side of Lake Washington and north of the Cedar River; this area of Renton is known as Highlands. Elevation ranges from approximately 320 feet above sea level at Cole Manor to 380-390 feet at Hillcrest Terrace and Evergreen Terrace.

The contemporary topography and surface geology of the project area were shaped by multiple glaciations that occurred during the end of the Pleistocene (Kruckeberg 1991:12). The most recent glacial event in the Puget Sound, called the Vashon Stade, is largely responsible for the region's contemporary landscape; glacial advance and retreat scoured and compacted underlying geology while meltwaters carved drainage channels into glacial outwash deposits (Downing 1983; Booth et al. 2003). By about 13,600 years ago, the last of the Pleistocene glaciers had retreated as far north as Seattle (Thorson 1980), exposing the predominately north-trending ridges and relatively level uplands characteristic of the Puget Sound region.

Local geological and soil maps indicate that sediments in the project area are derived from late Pleistocene glacial activity. According to the Washington Interactive Geologic Map (WA DNR 2016), the surface geologic units mapped in the project are Fraser-age continental glacial outwash (Qgo) and Fraser-age continental glacial till (Qgt), both dating to the late Pleistocene. The soil units mapped in the project location are Arents, Everett material; Arents, Alderwood material, 6 to 15 percent slopes; and Indianola loamy sand, 5 to 15 percent slopes (USDA NRCS 2016). The Arents soils formed on till plains in basal till parent material. The typical profile for Arents, Everett material is gravelly sandy loam from 0 to 8 inches and very coarse gravelly sand from 8 to 60 inches. The typical profile for Arents, Alderwood material is gravelly sandy loam from 0 to 26 inches and very gravelly sandy loam from 26 to 60 inches. The Indianola soil formed on terraces, eskers, and kame risers in sandy glacial outwash. The typical profile is slightly decomposed plant material over loamy sand from 1 to 17 inches below surface, followed by sandy horizons to a depth of 60 inches (USDA NRCS 2016). The locally mapped soils and geology indicate that deposition in the Holocene has been minimal and any archaeological material would have been relatively near the present-day ground surface. Archaeological sites may occur on the surface of outwash or till deposits, but would not be deeply buried.

Archaeological Context: Regional and local studies have provided an archaeological and historical synthesis of approximately the last 10,000 years of human occupation in the Puget Sound region (Nelson 1990). Human use of the area is generally structured around the value of natural resources available in local environments including fresh water, terrestrial and marine food resources, forests, and suitable terrain. The archaeological context for evaluating the project area is provided by the regional chronological sequence and research domains as included in Morgan et al. (1999), Suttles and Lane (1990), Wessen and Stilson (1987), and others.

The landscape of the project area would have been available for occupation once the Puget Lobe and meltwaters receded, over 10,000 years ago, and archaeological evidence from the region supports this (Carlson 1990). Archaeological sites from the Paleoindian period are scarce in the Puget Lowland and Cascade foothills. Recently, a Paleoindian component was identified in stratified sediments at a site on Bear Creek, a tributary of the Sammamish River (Kopperl et al. 2010), approximately 12 miles northeast of the project.

Archeologists have identified broad similarities among sites and lithic assemblages that date to between 9000 and 5000 B.P. Many of these early archaeological sites comprise the Olcott Phase in Western Washington and are contemporaneous with similar Cascade Phase sites identified east of Cascade Mountains. The Olcott Phase is characterized by occupation sites located on uplands or atop upper river terraces, lithic workshops, and temporary hunting camps that contain a wide variety of flaked stone tools and laurel-leaf-shaped bifaces suggestive of large game hunting, butchering and processing (Morgan et al. 1999). Several Olcott sites have been documented and studied throughout Western Washington and the Olympic Peninsula (e.g., Dancey 1968; Kidd 1964; Morgan et al. 1999; Samuels 1993).

Generally, changes in subsistence economy and occupation patterns are reflected in archaeological assemblages that date between 5000 and 3000 B.P. During this time, an increasing number of tools were manufactured by grinding stone, and more antler and bone were utilized for tools. This period is also indicated by the occurrence of smaller triangular projectile points. Living floors, evidence of structural supports and hearths are more common during this period in contrast to the Olcott Phase. In the Puget Lowland, evidence of task-specific, year-round activities that include salmon and clam processing, woodworking, basket and tool manufacture, date from approximately 4200 B.P. (Larson and Lewarch 1995).

Characteristic of the ethnographic pattern in the region, seasonal residence and logistical mobility occurred from about 3000 B.P. Organic materials, including basketry, wood and food stuffs, are more likely to be preserved in sites of this late precontact period, both in submerged, anaerobic sites and in sealed storage pits. Sites dating from this period represent specialized seasonal spring and summer fishing and root-gathering campsites and winter village locations. These kinds of sites have been identified in the Puget Lowland, typically located adjacent to rivers or marine transportation routes. Fish weirs and other permanent constructions are often associated with large occupation sites. Common artifact assemblages consist of a range of hunting, fishing and food processing tools, bone and shell implements and midden deposits. Similar economic and occupational trends persisted throughout the Puget Sound region until the arrival of European explorers.

Ethnographic Context: The project area is located in the traditional territory of the Duwamish Tribe, a Salish-speaking people who lived in the general vicinity of Seattle (Castile 1985; Spier 1936; Smith 1940). Pre-contact Duwamish settlements were often located along major waterways and at heads of bays or inlets, where abundant resources of coastal and estuarine environments supported a relatively rich, diverse, and reliable subsistence base. During the winter months, the Duwamish lived in large villages at permanent settlements, while the summers were spent fishing, hunting and gathering at temporary camps. Prior to local Euro-American settlement, Duwamish villages were reported along Elliot Bay, Lake Washington, Lake Union, and Salmon Bay, and the Duwamish, Black, Green (now called White), and Cedar Rivers and their tributaries (Ruby and Brown 1992:72; Spier 1936:34; Suttles and Lane 1990:486; Waterman ca. 1920). The Muckleshoot Indian Tribe exercises Duwamish fishing rights on Lake Washington, as recognized as successors to the Duwamish. The Duwamish tribal organization does not currently have federal recognition.

Ethnographers (Smith 1940, 1941; Spier 1936; Waterman ca. 1920, 2001) gathered locations of villages and names for resource areas, water bodies, and other landscape features from native informants. Numerous ethnographic sites are recorded in the Renton area. These are primarily around the southern shoreline of Lake Washington, and along the Duwamish, Cedar, Green, and former Black River channels (Smith 1941; Waterman ca. 1920, 2001). To the west of the project near the south end of Lake Washington, there was a village where the Cedar River flowed into the former Black River called *TuxE'b-go*, “confluence” (Waterman 2001:149). Smith (1940:16) also refers to a place name that may be in the same location, *katilbabc*, “where the Cedar River joined the outlet from Lake Washington, present town of Renton.” Waterman (2001:149) recorded *SkEte'lubc* as “the present habitation of Mrs. Jimmy Moses, an Indian informant, in the town of Renton.” This place is mapped on the east side of the former Black River (Waterman 2001:148). The head of the former Black River at the south end of Lake Washington was called *Ciq'ed*, translated as “head” or “source” (Waterman 1922:191).

One name is recorded as in the vicinity of the Highlands area (Waterman’s map is not exacting): *Tu'qwi'tLûs*, which is translated as “‘red face,’ for a high bluff east of Renton” (Waterman 2001:148-149). No specific ethnographic references to the project location were found. The sources reviewed did not disclose any recorded traditional cultural properties (TCPs) in the project area.

Historic Context: Euro-American settlement began in the Renton area around 1850 (Bagley 1929:27). An increased number of settlers began to populate the region in search of homesteads and employment. This was due in part to the enactment of Oregon Donation Land Act in 1850, which drew settlers to the area by offering free 320-acre parcels to those who would reside on and cultivate the land for four consecutive years. By the mid-1850s, increased Euro-American settlement had drastically impacted Indian people and their traditions through disease, violence, and the disruption of settlements and subsistence economies. In 1855, the Duwamish and other Puget Sound tribes signed the Point Elliot Treaty, which forced local tribes onto reservations. The Duwamish were not assigned their own reservation, but rather were required to live on either the Port Madison Indian Reservation on the Kitsap Peninsula or the Muckleshoot Indian Reservation between Auburn and Enumclaw. This time period was marked by heightened tension and violence between tribes and white settlers throughout Puget Sound.

Early Euro-American settlement activity focused on easily accessed areas such as shorelines and river valleys. The Renton area, particularly the Black River and its confluence with the Cedar River, had attracted homesteaders by the early 1850s. According to an online search of federal land records, patents for lands containing the project were not issued until the late 1880s to early 1890s (BLM 2016) (Table 1).

Coal deposits in the Renton area attracted numerous prospectors to the local area. Dr. R. M. Bigelow identified coal along the Duwamish River in 1853 and began to actively pursue mining in the area (Kirk and Alexander 1990:281). By the 1870s, Renton coal had sparked the interest of investors and entrepreneurs who were able to improve industry productivity and profits by expanding mine tunnels, bunkers and building company housing (Kirk and Alexander 1990:281, 348). Among those who invested in early industry in the area was William Renton of the Port Blakely Mill Company, who learned of coal deposits in the vicinity of the project and was a cofounder of the Renton Coal Company (Phillips 1971:117), incorporated in 1874 (Buerge 1989:26). To help meet increased demand for coal, the Seattle & Walla Walla Railroad was built connecting Renton to Elliot Bay beginning in 1874 (Robertson 1995:265). Lines were later extended from Renton to other coal mining centers at Newcastle and Black Diamond.

The logging industry also figured prominently in early economic activity in the greater Renton area, as it did in most of western Washington. One of the first businesses in the vicinity of downtown Renton was a sawmill operated by Henry Tobin on the Black River from 1854 until his death in 1856 (Slauson 1976:2). William Renton, for whom the City of Renton is named, became interested in the area for its timber and started logging the south end of Lake Washington in the 1870s (Slauson 1976:6). After lands were logged, they were often sold off to private individuals and cleared for agricultural uses.

As previously summarized by Schumacher (2015:6), the Renton coal mines began to close by the 1890s; however, the city's location on a transportation corridor continued to stimulate industrial, commercial, and residential development (Kirk and Alexander 1990). Sunset Highway was built through the Highlands area by 1910, and until 1940 was the main road between Seattle and Snoqualmie Pass (Buerge 1989). In 1940, establishment of the Boeing Company aircraft manufacturing plant brought greater industrial prosperity. By 1942 and the entry of the United States into the Second World War, Boeing employed over 40,000 people.

In contrast to the concentration of mid to late nineteenth century developments in the Cedar and Black River valleys, Euro-American use of the project vicinity remained sparse and rural until the early 1940s, when demand for worker housing skyrocketed. Many Renton neighborhoods were established during the war years. Following the end of the war, the federal government aided Renton's construction of housing projects and residential infrastructure, which included the Highlands north and south of Sunset Highway (Buerge 1989).

Historical Maps: The General Land Office (GLO) surveyed the township surrounding the project in the late 1850s, at which time the landscape was undeveloped and sparsely populated. Trails passing through Renton are recorded on early maps (United States Surveyor General [USSG] 1865) (Figure 5). These trails provided access to Elliott Bay and to eastern Washington

(Lewarch 2006:Figure 3; Prater 1981:6-13). One trail led from the Black River up the Cedar River, and there was another trail from the Black River to the Snoqualmie River (USSG 1865). The Homestead Act of 1862 brought an increase of settlers to the region. No other cultural features such as homestead improvements or Indian villages are shown in the vicinity of the project. At the end of the nineteenth century, all portions of the project were mapped as within an area that had been burnt, but timber stands were restocking (USGS 1897a, 1897b). Some roads extended to the Highlands area, connecting it to Renton, the Cedar River valley, and the May Creek valley. The land classification and topographic maps from this period do not show any roads, structures, or other developments in the project location (USGS 1895, 1900).

In the first decade of the twentieth century, more roads were built in the area and the Snoqualmie Falls Power Company had an electrical transmission line passing near Cole Manor, connecting the company's Renton substation to its powerhouse at Snoqualmie Falls. The Cole Manor location is shown as within a tract of School Land in early twentieth century county atlases (Anderson Map Company 1907; Kroll Map Company 1912). By 1926, the portion of Section 16 containing Cole Manor had been acquired by the heirs of I. Sartorie (also listed as Jennie Sartorie et al.) (Kroll Map Company 1926; Metsker 1936). There was a mine or pit in the Cole Manor location in 1949 (USGS 1949). The Hillcrest and Evergreen Terrace locations are mapped as within lands owned by Thomas J. White, Jr. (Anderson Map Company 1907; Kroll Map Company 1912, 1926; Metsker 1936). The Evergreen Terrace location remained undeveloped in 1950, while single-family residences had been built along Kirkland Avenue in the Hillcrest location (USGS 1950).

Historical air photos of the area are available beginning in 1936. The Cole Manor location was in an area of shrub forest with a network of logging areas. A road had been established in the present-day NE 4th Street corridor by this time (King County 2016). Similar vegetation conditions were in place at Evergreen Terrace and Hillcrest Terrace, and farms had been established within 1,000 feet to the west, south, and east (King County 2016). By 1964, Hillcrest Terrace had been built but the Evergreen Terrace location remained forested (NETR 2016). The 1968 air photos show Evergreen Terrace construction as complete (NETR 2016).

In 1964, the Cole Manor location contained one building, likely a shop or maintenance building; the surrounding area is characterized by clearings, vehicle tracks, and blade scars consistent with sand and gravel mining or other mass grading to prepare level development sites (NETR 2016). In 1968, the location appears to be in a similar industrial use (NETR 2016). These conditions persisted in 1980 (NETR 2016), immediately prior to construction of Cole Manor.

DAHP WISAARD: Seventeen cultural resource studies have been carried out within approximately one mile from the project. These include assessment of proposed transportation improvements to the I-405 corridor (e.g., Bundy 2008; Smith 2014), proposed cell towers (e.g., Stipe 2007), road widening projects (Chambers 2006), and bridge replacement (Baldwin 2016), as well as data recovery excavations (e.g., Kaehler et al. 2004).

Cultural resources assessments have also been conducted for other Renton Housing Authority developments in close proximity to the current project. Two studies addressed potential effects to cultural resources from the Sunset Terrace redevelopment (Elder et al. 2010; Stevenson et al.

2011); one study addressed potential effects of construction of a new community building at Hillcrest Terrace (Hetzl and Elder 2010); and CRC recently conducted archaeological and historical investigations at Sunset Court (Schumacher 2015). These studies involved background research, inventory and evaluation of historic buildings, and archaeological survey including subsurface testing. None of these studies identified any archaeological sites in proximity to the current project. These surveys identified subsurface conditions consistent with the non-depositional geological setting and developed urban character of the area, in which the near-surface deposits that would have contained archaeological sites have been removed, graded, or otherwise disturbed, eliminating potential for intact sites (Elder et al. 2010:7.1; Hetzel and Elder 2010:4.1; Schumacher 2015:8; Stevenson et al. 2011:7.1).

Nine archaeological sites have been recorded within a distance of approximately two miles from the project (Table 2). The archaeological site located nearest to the project is site 45KI786, which consisted of early twentieth century human remains and coffin hardware that was found in a construction trench about 1/3 of a mile northwest of the project (Rooke 2008). Other sites within two miles from the project are in the May Creek valley and near the historical confluence of the Black and Cedar rivers south of Lake Washington. Archaeological sites have not previously been recorded within or adjacent to the project.

The NRHP, Washington Heritage Register (WHR), and King County Landmarks Register (KCLR) do not include any properties in proximity to the project. The project is not within or adjacent to any historic districts. The register-listed historic properties nearest to the project are nearly one mile away in downtown Renton (Table 3). The project would not affect these historic properties. Dozens of historic buildings have previously been inventoried within approximately 500 feet from the project. These are predominantly mid-twentieth century residences that were added to the Historic Property Inventory (HPI) as part of DAHP's 2011 HPI Upload Project, which involved the addition of available information from the County Assessors' building records to WISAARD (Artifacts Consulting 2011). None of the uploaded data was field verified at the time, nor were eligibility assessments conducted. Aside from the previously determined NRHP-ineligible Hillcrest Terrace Public Housing Complex, all of the previously inventoried structures are well outside the limits of the project. Given the scope and nature of the project, effects to aboveground historic properties are not anticipated.

Archaeological Predictive Model: The DAHP statewide predictive model uses environmental data about the locations of known archaeological sites to identify where previously unknown archaeological sites are more likely to be found. The model correlates locations of known archaeological to environmental data "to determine the probability that, under a particular set of environmental conditions, another location would be expected to contain an archaeological site" (Kauhi and Markert 2009:2-3). Environmental data categories included in the model are elevation, slope, aspect, distance to water, geology, soils, and landforms. Model rankings for the project location are variable. The Hillcrest site is ranked mostly as "Survey Contingent on Project Parameters: Moderately Low Risk," with the eastern part ranked as "Survey Recommended: Moderate Risk." The Evergreen Terrace site is ranked "Survey Recommended: Moderate Risk." The Cole Manor site is ranked mostly as "Survey Highly Advised: High Risk" with the southeastern part ranked "Survey Recommended: Moderate Risk" (DAHP 2016). The low-risk rankings are generally supported by the local historic, ethnographic, and archaeological

records, as well as the historical upland forest setting elevated above river valleys and minor drainages (e.g., May Creek) with fresh water sources. The high-risk ranking for Cole Manor appears to be driven by relative proximity (distance ca. one mile) to the Cedar River, recorded archaeological sites (distance less than one mile) and a historically mapped trail (distance less than ¼ mile) (see Figure 5), but this location is also in an upland forest setting elevated above the river.

Archaeological Expectations: Based upon the review of environmental and cultural information about the project location, the Hillcrest Terrace, Evergreen Terrace, and Cole Manor locations are all considered to have a very low potential to contain potentially significant cultural resources (i.e. intact archaeological deposits). The project area likely served as a locus of temporary and transitory activities such as resource procurement activities and as a hunting, foraging, travel, or for individual religious activities for Puget Sound peoples in the precontact and historic periods. Potential types of precontact archaeological materials in the project might include lithic scatters, fire-modified rock, tools or other isolated materials lost or discarded in the course of these activities. Historic-period archaeological materials may include objects related to logging, farming, and domestic activities, although background research suggests that the potential for historic-period historic properties is low.

3. Results

Cultural Resources Identified: As noted above, the previously recorded and determined NRHP-eligible Hillcrest Terrace Housing Complex was identified within the project. The Evergreen Terrace Housing Complex was recorded on an HPI form (WISAARD Property #706382) that was submitted to DAHP for review on August 2, 2016. This reconnaissance level inventory did not identify any evidence that the property meets criteria for historical significance. DAHP provided a determination that the property is not eligible for the NRHP on August 4, 2016. Because Hillcrest and Evergreen Terrace have been determined not eligible for the NRHP, any alterations would not constitute an effect to historic properties (36 CFR 800.4 (2)(d)(1)).

Project Conclusions, Findings and Recommendations: The project will not affect any previously recorded historic properties. None of the proposed activities at Cole Manor, Evergreen Terrace, or Hillcrest Terrace will affect aboveground historic properties, nor did the addition of the garbage recycling station at Hillcrest in March 2016. No further historical evaluation is recommended for the project.

Background research did not identify any high-probability locations for archaeological sites at Cole Manor, Evergreen Terrace, or Hillcrest Terrace. Conditions identified through review of local geological and soils maps, historical maps, and historical air photos suggest a very low potential for archaeological deposits to be preserved due to the project's geomorphic setting and impacts of prior disturbances. Since the soils in the project are derived from parent material deposited and exposed during glacial activity, cultural materials are not expected to be found below the surface of the glacial deposits. Any potential evidence for buried cultural resources in the project would be expected to be between glacial material, which is shallowly buried, and the present-day ground surface. Near-surface sediments in the project have previously been

disturbed by late nineteenth century logging and construction of the present-day facilities in the latter half of the twentieth century.

Construction of the existing buildings and grounds would have required mass grading as well as some filling and excavation. Based upon the coverage of the involved parcels by existing buildings, parking lots, manicured lawns, and other improvements, past disturbance is expected to have impacted all native surfaces; any new ground disturbance for the current project is expected to be within previously disturbed sediments or culturally sterile glacial deposits. Intact archaeological deposits, either precontact or historic in age, are highly unlikely to be preserved in this setting. Pedestrian survey and subsurface testing would be very unlikely to identify archaeological deposits given the geological setting, history of landscape modification, distance from known archaeological sites, and the strong probability that the project area was used for temporary and transitory activities such as hunting, foraging, travel, or for individual religious activities unlikely to leave a generate significant archaeological sites. CRC therefore recommends that the project be permitted to proceed without further archaeological oversight.

An inadvertent discovery plan is included as Attachment B. In the event that ground disturbing or other activities do result in the inadvertent discovery of archaeological deposits, work should be halted in the immediate area and contact made with DAHP in Olympia. Work should be halted until such time as further investigation and appropriate consultation is concluded. In the unlikely event of the inadvertent discovery of human remains, work should be immediately halted in the area, the discovery covered and secured against further disturbance, and contact effected with law enforcement personnel.

Attachments:

Figures	<input checked="" type="checkbox"/>
Photographs	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/> Copies of project related correspondence between CRC and cultural resources staff at the Duwamish, Muckleshoot, and Snoqualmie tribes. <input checked="" type="checkbox"/> Proposed inadvertent discovery plan.

4. Limitations of this Assessment

No cultural resources study can wholly eliminate uncertainty regarding the potential for prehistoric sites, historic properties or traditional cultural properties to be associated with a project. The information presented in this report is based on professional opinions derived from our analysis and interpretation of available documents, records, literature, and information identified in this report, and on our field investigation and observations as described herein. Conclusions and recommendations presented apply to project conditions existing at the time of our study and those reasonably foreseeable. The data, conclusions, and interpretations in this report should not be construed as a warranty of subsurface conditions described in this report. They cannot necessarily apply to site changes of which CRC is not aware and has not had the opportunity to evaluate.

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6. Figures and Tables

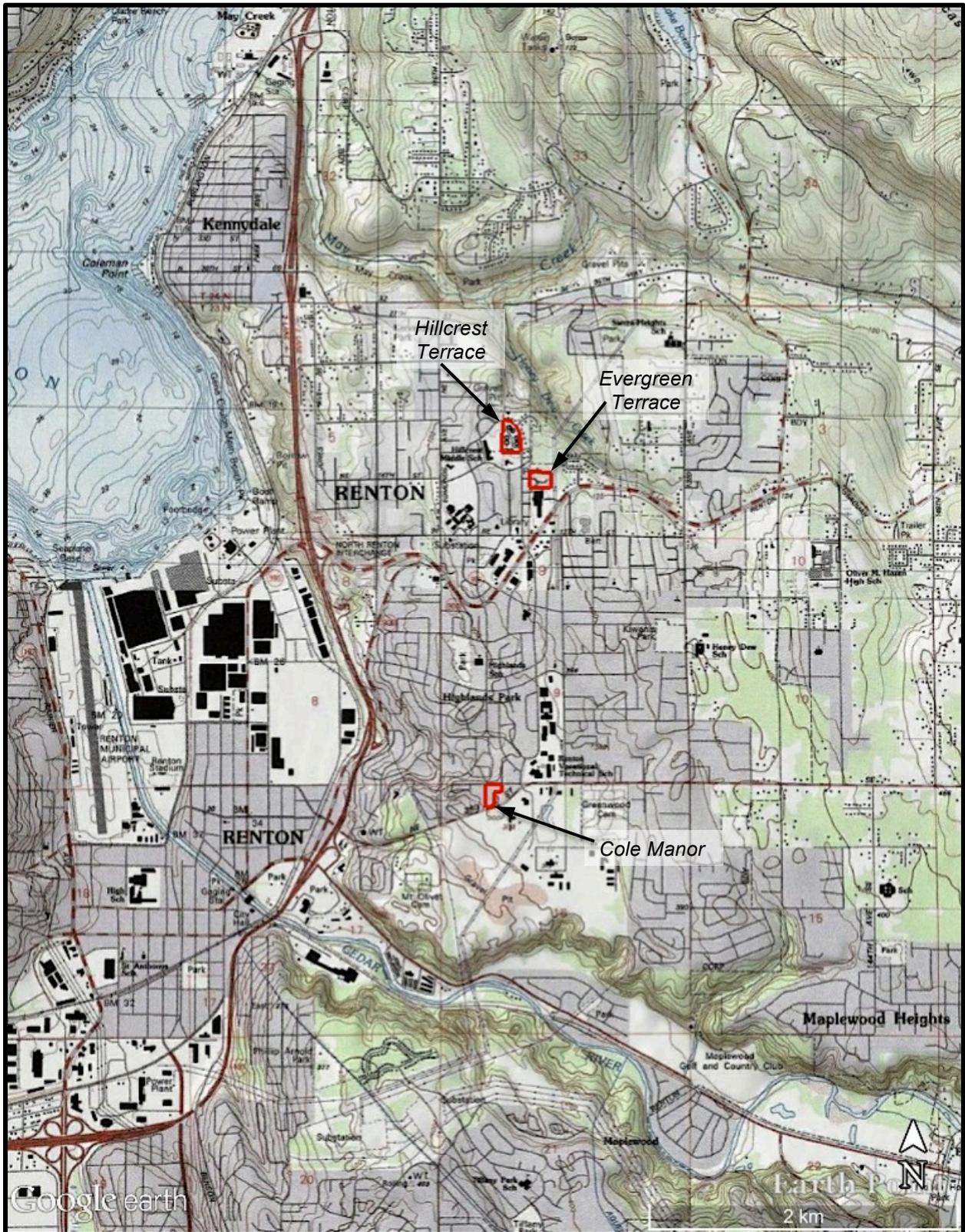


Figure 1. Project shown on portions of the Bellevue South, and WA Renton, WA (USGS 1983, 1997) topographic quadrangles.



Figure 2. Cole Manor marked on aerial imagery from 2015 (base map: Google Earth).

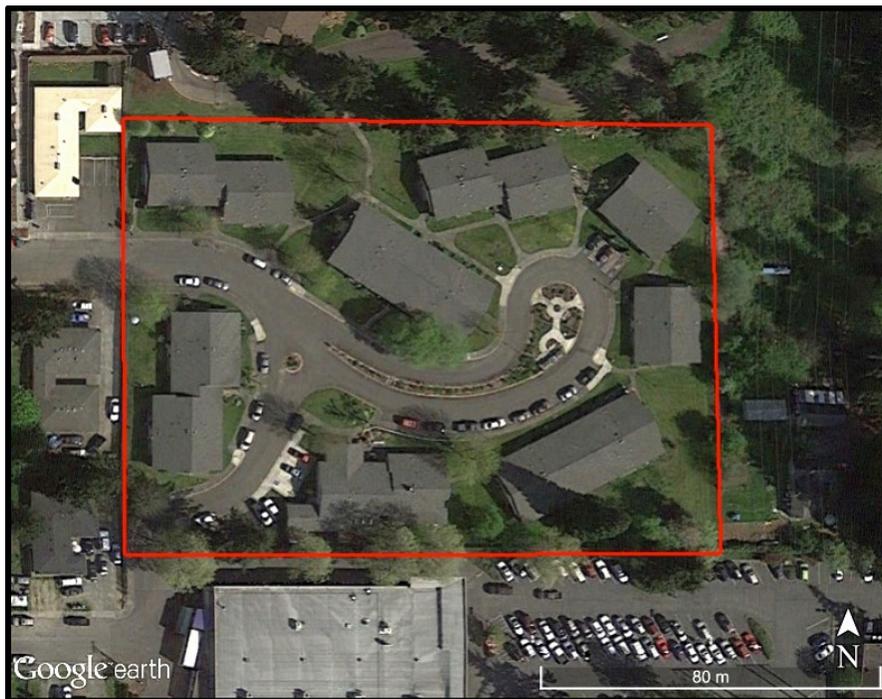


Figure 3. Evergreen Terrace marked on aerial imagery from 2015 (base map: Google Earth).

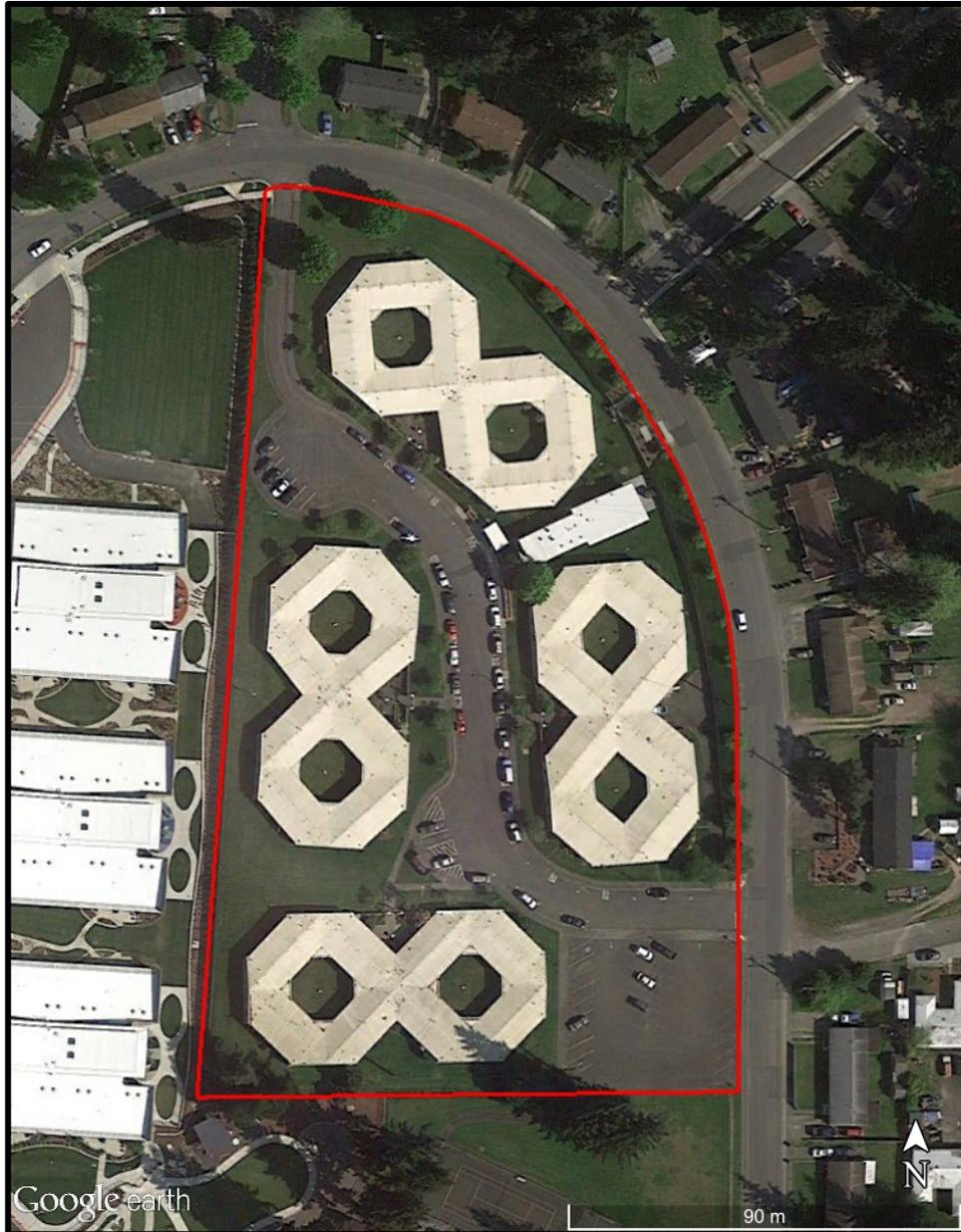


Figure 4. Hillcrest Terrace marked on aerial imagery from 2015 (base map: Google Earth).

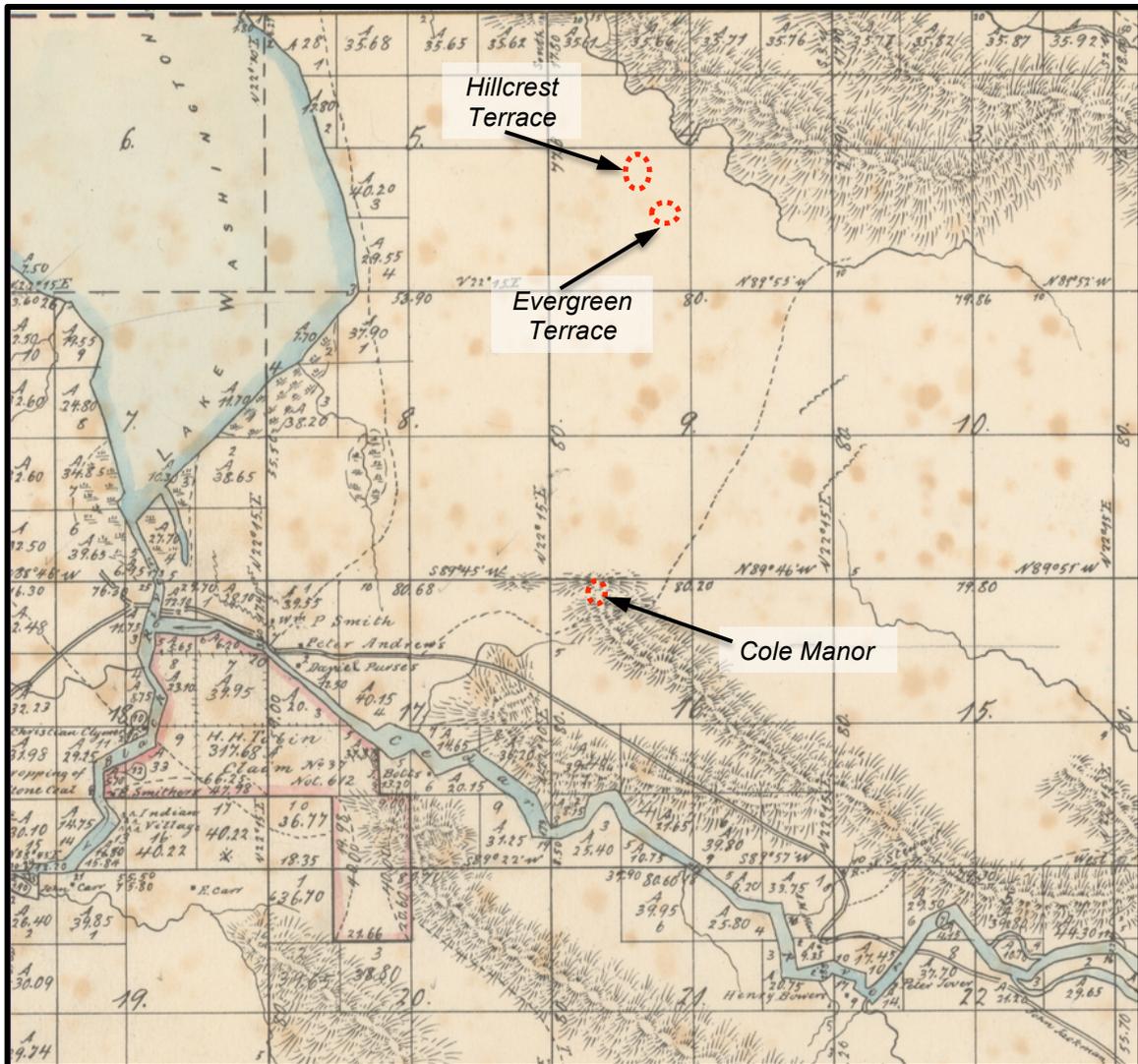


Figure 5. Project location marked on GLO map (USSG 1865).

Table 1. Land patents recorded within the project (BLM 2016), all located in Township 23 N., Range 5 E., W.M.

Name	Date	BLM Serial No.	Authority	Sections and Aliquots	Total Acres
Thomas J. White	4/23/1891	WASAA 068133	Sale-Cash Entry	S½ of SW¼ and NE¼ of SW¼ of Section 4	120
Washington State	11/11/1889	WAORAA 000126	Enabling Act of 1872	N½ of Section 16	1,518,676.68

Table 2. Archaeological sites recorded within approximately two miles from the project. No archaeological sites have been recorded in or adjacent to the project.

Site Number	Site Type	Distance from Project	Historic Register Status	Potential Project Effects
45KI786	Historic Cemetery/Burial	.34 mile NW	Unevaluated.	None.
45KI404	Historic Military Properties	1.47 miles W	Unevaluated.	None.
45KI686	Pre Contact Feature	.71 mile SW	Recommended eligible for NRHP.	None.

Site Number	Site Type	Distance from Project	Historic Register Status	Potential Project Effects
45KI538	Historic Railroad Properties	.79 mile S	Recommended not eligible for NRHP.	None.
45KI542	Historic Debris Scatter/Concentration; Historic Structures Not Specified	.83 mile SW	Unevaluated.	None.
45KI501	Pre Contact Shell Midden	1.5 miles WSW	Recommended eligible for NRHP.	None.
45KI821	Historic Structures Not Specified	1.25 mile NE	Unevaluated.	None.
45KI211	Historic Debris Scatter/Concentration; Historic Mining Properties	1.49 mile SW	Listed on WHR.	None.
45KI848	Historic Commercial Properties	1.42 mile SW	Determined not eligible for the NRHP.	None.

Table 3. Register-listed historic properties recorded within 1.5 miles from the project. No historic properties have been recorded in or adjacent to the project.

Register Name	Address	Historic Function	Built Date	Historic Register Status	Potential Project Effects
Renton Fire Station	235 Mill Ave S	Government – Fire Station	1939	Listed on WHR.	None.
Renton Substation, Snoqualmie Falls Power Company	1017 S 3rd St	Industry / Processing / Extraction – Energy Facility	1898	Listed on WHR.	None.

Attachment A. Copies of project correspondence sent to the cultural resources staff of the Duwamish, Muckleshoot, and Snoqualmie tribes.



July 15, 2016

Duwamish Tribe
Cecile Hansen, Chairwoman
4705 W Marginal Way SW
Seattle, WA 98106-1514

Re: Cultural Resources Assessment for the Renton Housing Authority Project, Renton, King County, WA

Dear Cecile:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may have that is not readily available through other written sources. The project is located in Renton, Washington. Berk Consulting is requesting this assessment on behalf of Renton Housing Authority. Renton Housing Authority is planning for capital projects at Cole Manor (built 1981), Evergreen Terrace (built 1968), and Hillcrest (built 1962-63) that will receive federal funding from the Department of Housing and Urban Development (HUD). This federal undertaking must comply with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act.

We are in the process of reviewing available information. Background research will include a site files search at the Washington State Department of Archaeology and Historic Preservation, review of previously recorded cultural resource reports, and review of pertinent published literature and ethnographies. Results of our investigations will be presented in a technical memo.

We are aware that not all information is contained within published sources. Should the Tribe have additional information to support our assessment, we would very much like to include it in our study. Please contact me at sonja@crewa.com or 360-395-8879 should you wish to provide any comments. I appreciate your assistance in this matter and look forward to hearing from you.

Sincerely,



Sonja Kassa
Projects Manager

PO BOX 10668, BAINBRIDGE ISLAND, WA 98110
PHONE 206.855.9020 - sonja@crewa.com



July 15, 2016

Muckleshoot Indian Tribe
Laura Murphy, Archaeologist/Cultural Resources
39015 172nd Ave SE
Auburn, WA 98092

Re: Cultural Resources Assessment for the Renton Housing Authority Project, Renton, King County, WA

Dear Laura:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may have that is not readily available through other written sources. The project is located in Renton, Washington. Berk Consulting is requesting this assessment on behalf of Renton Housing Authority. Renton Housing Authority is planning for capital projects at Cole Manor (built 1981), Evergreen Terrace (built 1968), and Hillcrest (built 1962-63) that will receive federal funding from the Department of Housing and Urban Development (HUD). This federal undertaking must comply with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act.

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We are aware that not all information is contained within published sources. Should the Tribe have additional information to support our assessment, we would very much like to include it in our study. Please contact me at sonja@crcwa.com or 360-395-8879 should you wish to provide any comments. I appreciate your assistance in this matter and look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Sonja". The signature is fluid and cursive, with a large initial "S" and a trailing flourish.

Sonja Kassa
Projects Manager

PO BOX 10668, BAINBRIDGE ISLAND, WA 98110
PHONE 206.855.9020 - sonja@crcwa.com



July 15, 2016

Snoqualmie Indian Tribe
Steven Mullen-Moses
8130 Railroad Ave, Suite 103
PO Box 969
Snoqualmie, WA 98065

Re: Cultural Resources Assessment for the Renton Housing Authority Project, Renton, King County, WA

Dear Steven:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may have that is not readily available through other written sources. The project is located in Renton, Washington. Berk Consulting is requesting this assessment on behalf of Renton Housing Authority. Renton Housing Authority is planning for capital projects at Cole Manor (built 1981), Evergreen Terrace (built 1968), and Hillcrest (built 1962-63) that will receive federal funding from the Department of Housing and Urban Development (HUD). This federal undertaking must comply with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act.

We are in the process of reviewing available information. Background research will include a site files search at the Washington State Department of Archaeology and Historic Preservation, review of previously recorded cultural resource reports, and review of pertinent published literature and ethnographies. Results of our investigations will be presented in a technical memo.

We are aware that not all information is contained within published sources. Should the Tribe have additional information to support our assessment, we would very much like to include it in our study. Please contact me at sonja@crcwa.com or 360-395-8879 should you wish to provide any comments. I appreciate your assistance in this matter and look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Sonja Kassa".

Sonja Kassa
Projects Manager

PO BOX 10668, BAINBRIDGE ISLAND, WA 98110
PHONE 206.855.9020 - sonja@crcwa.com

Attachment B. Proposed Inadvertent Discovery Protocol

Protocols for Discovery of Archaeological Resources

The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly disturbing archaeological sites without a permit from the Washington State Department of Archaeology and Historic Preservation (DAHP), and the Indian Graves and Records Act (RCW 27.44) prohibits knowingly disturbing Native American or historic graves.

In the event that archaeological resources are encountered during project implementation, the following actions will be taken:

All ground disturbing activity at the find location will stop, and the work supervisor will be notified immediately. The find location will be secured from any additional impacts.

The project proponent will immediately contact the agencies with jurisdiction over the lands where the discovery is located, if appropriate. The appropriate agency archaeologist or the proponent's contracting archaeologist will determine the size of the work stoppage zone around the discovery location in order to sufficiently protect the resource until further decisions can be made regarding the work site.

The project proponent will consult with DAHP regarding the evaluation of the discovery and the appropriate protection measures, if applicable. Once the consultation has been completed, and if the site is determined to be NRHP-eligible, the project proponent will request written concurrence that the agency or tribe(s) concurs that the protection and mitigation measures have been fulfilled. Upon notification of concurrence from the appropriate parties, the project proponent will proceed with the project.

Within six months after completion of the above steps, the project proponent will prepare a final written report of the discovery. The report will include a description of the contents of the discovery, a summary of consultation, and a description of the treatment or mitigation measures.

Protocols for Discovery of Human Remains

If human remains are found within the project area, the project proponent, its contractors or permit-holders, the following actions will be taken, consistent with Washington State RCWs 68.50.645, 27.44.055, and 68.60.055:

If ground-disturbing activities encounter human skeletal remains, then all activity will cease that may cause further disturbance to those remains. The area of the find will be secured and protected from further disturbance. The project proponent will prepare a plan for securing and protecting exposed human remains and retain consultants to perform these services. The finding of human skeletal remains will be reported to the county medical examiner/coroner and local law enforcement in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county medical examiner/coroner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county medical examiner/coroner determines the remains are non-forensic, then they will report that finding to DAHP, which will then take jurisdiction over the remains. DAHP

will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and the affected tribes. DAHP will then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

Contact Information

Duwamish Tribe

4705 W Marginal Way SW
Seattle, WA 98106-1514
Primary Contact: Cecile Hansen, Chair, 206-431-1582

Muckleshoot Indian Tribe

39015 172nd Ave SE
Auburn, WA 98092
Primary Contact: Laura Murphy, Archaeologist/Cultural Resources, 253-876-3272

Snoqualmie Indian Nation

PO Box 969
Snoqualmie, WA 98065
Primary Contact: Steven Mullen-Moses, Director of Archaeology and Historic Preservation, 425-495-6097

Washington Department of Archaeology and Historic Preservation

PO Box 48343, Olympia, WA 98504-8343
Lead Representative: Allyson Brooks, State Historic Preservation Officer, 360-586-3066
Primary Contact: Rob Whitlam, State Archaeologist, 360-586-3080
Primary Contact for Human Remains: Guy Tasa, State Physical Anthropologist, 360-586-3534

King County Medical Examiner's Office

325 9th Avenue, Box 359792, Seattle, WA 98104
Lead Representative and Primary Contact: Richard Harruff, MD, PhD, Chief Medical Examiner, 206-731-3232

Renton Police Department

1055 S Grady Way, Renton, WA 98057
Lead Representative: Kevin Milosevich, Chief of Police, 425-430-7500
Primary Contact: Non-Emergency Number, 425-235-2121