

Attachment E

Cultural and Historic Resources Documentation and Correspondence

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

August 22, 2017

Mr. Mark Assam
Federal Transit Administration
915 Second Ave
Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:
Project Tracking Code: 100611-07-FTA
Property: Sound Transit's Lynnwood Link Extension Light Rail Project
Re: APE Revision, Not Eligible, No Historic Properties

Dear Mr. Assam:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP) and providing information on the expansion of the area of potential effects (APE), new historic property inventory forms (HPIs) on four properties within the expanded APE, and the memorandum on the results of archaeological monitoring at the Ronald Bog Park wetland mitigation area. All of the work was completed by ESA.

First, I have no comments or issues with the APE expansion. Of the four properties identified within the APE expansion, Mr. Russell Holter has reviewed the HPI forms (for residences located at 23503, 23505, 23507, and 23509 59th Place W) and concurs with your determination that none of the properties are eligible for listing in the National Register of Historic Places (NRHP). Additionally, I have reviewed the memorandum on the archaeological monitoring at the Ronald Bog Park site and concur with your determination that no additional archaeological testing is required at that site in light of the negative results of the monitoring.

As a result of our concurrences, further contact with DAHP on this matter is not necessary. However, if information become available and/or the scope of work changes, please resume consultation by DAHP and all consulting parties. In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and contact made with concerned tribes and DAHP for further consultation.

We appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to



submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website

Thank you for the opportunity to review and comment. If you have any questions, please don't hesitate to contact me.

Sincerely,



Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov





U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
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206-220-7954
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January 3, 2018

Dr. Allyson Brooks
State Historic Preservation Officer
Department of Archaeology and Historic Preservation
1110 S. Capitol Way, Suite 30
Olympia, WA 98501

**Subject: Sound Transit Lynnwood Link Extension
Twin Ponds Park Utility Work
Area of Potential Effects Boundary Revision, Eligibility and Effects Determination
Project Tracking Code: 100611-07-FTA**

Dear Dr. Brooks:

On July 10, 2015, the Federal Transit Administration (FTA) issued a Record of Decision (ROD) for the Lynnwood Link Extension Project (Project), based on a Final Environmental Impact Statement (FEIS) dated April 3, 2015. The Project will extend the Sound Transit Link Light Rail system from Northgate in Seattle into Shoreline, Mountlake Terrace and Lynnwood in Snohomish County. As part of the Section 106 process conducted in coordination with the FEIS for the Project, FTA identified the Area of Potential Effects (APE) for the Project to be generally one block (approximately 200 feet) on either side of at-grade or elevated project components, and a similar distance around station and maintenance facility locations. On October 8, 2014, FTA determined that the Project would have no adverse effect on historic properties. The State Historic Preservation Officer (SHPO) concurred with this determination on November 6, 2014.

Since the 2015 FEIS and ROD, Sound Transit has collaborated with the City of Shoreline and other agencies with jurisdiction to finalize the design and secure permits. As part of this work, the Project design has been refined to identify new utility relocation work near Twin Ponds Park, in an area that is located outside the Project's existing APE. The proposed work includes:

- Replacement of two existing Seattle City Light electrical poles with three new poles;
- Construction of a new, below-ground electrical vault;
- Construction of two private telecommunications vaults; and
- Installation of approximately 250 linear feet of underground duct bank.

The utility work described above will occur along a street right-of-way and in an existing parking lot of Twin Ponds Park. Figure 1 attached to this letter illustrates the existing APE and the proposed APE boundary revision at Twin Ponds Park to incorporate this utility work. Figure 2 provides a detailed view of the proposed APE boundary revision. Figure 3 provides a design drawing with callout descriptions of the utility work. Figure 4 is a streetscape view of the electrical pole located adjacent to the parking lot at Twin Ponds Park.

Sound Transit has conducted historic background research and a pedestrian reconnaissance of the APE boundary revision. The results of these studies are documented in the attached technical memorandum, dated October 4, 2017. Based on the description of the proposed utility work and the historic research documentation provided by Sound Transit, FTA has made the following determinations:

1. The APE boundary for the Project is revised to include the limits of the Twin Ponds Park utility work, as depicted on the attached Figures 1, 2, and 3;
2. There are no properties listed on the National Register of Historic Places (NRHP) or properties that may be eligible for listing on the NRHP within the APE boundary revision; and
3. The Twin Ponds Park utility work would not change the existing overall Project Section 106 determination of no adverse effect on historic properties.

FTA also recommends that no further archaeological work associated with the Twin Ponds Park utility work be conducted. Sound Transit will continue to implement and follow the existing Inadvertent Discovery Plan (IDP) that has been developed for the Project.

We would appreciate any comments you may have concerning the above determinations within 30 days of receipt of this letter. If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or by email mark.assam@dot.gov, or Elma Borbe, Sound Transit, at (206) 398-5445 or by email at elma.borbe@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

AMY M. CHANGCHIEN

Digitally signed by AMY M. CHANGCHIEN
DN: c=US, o=U.S. Government, ou=FTA FTASeattleWA,
ou=DOT FTASeattleWA, cn=AMY M. CHANGCHIEN
Date: 2018.01.03 13:24:05 -08'00'

Amy Changchien
Director, Office of Planning and Program Development

Cc: Elma Borbe, Sound Transit

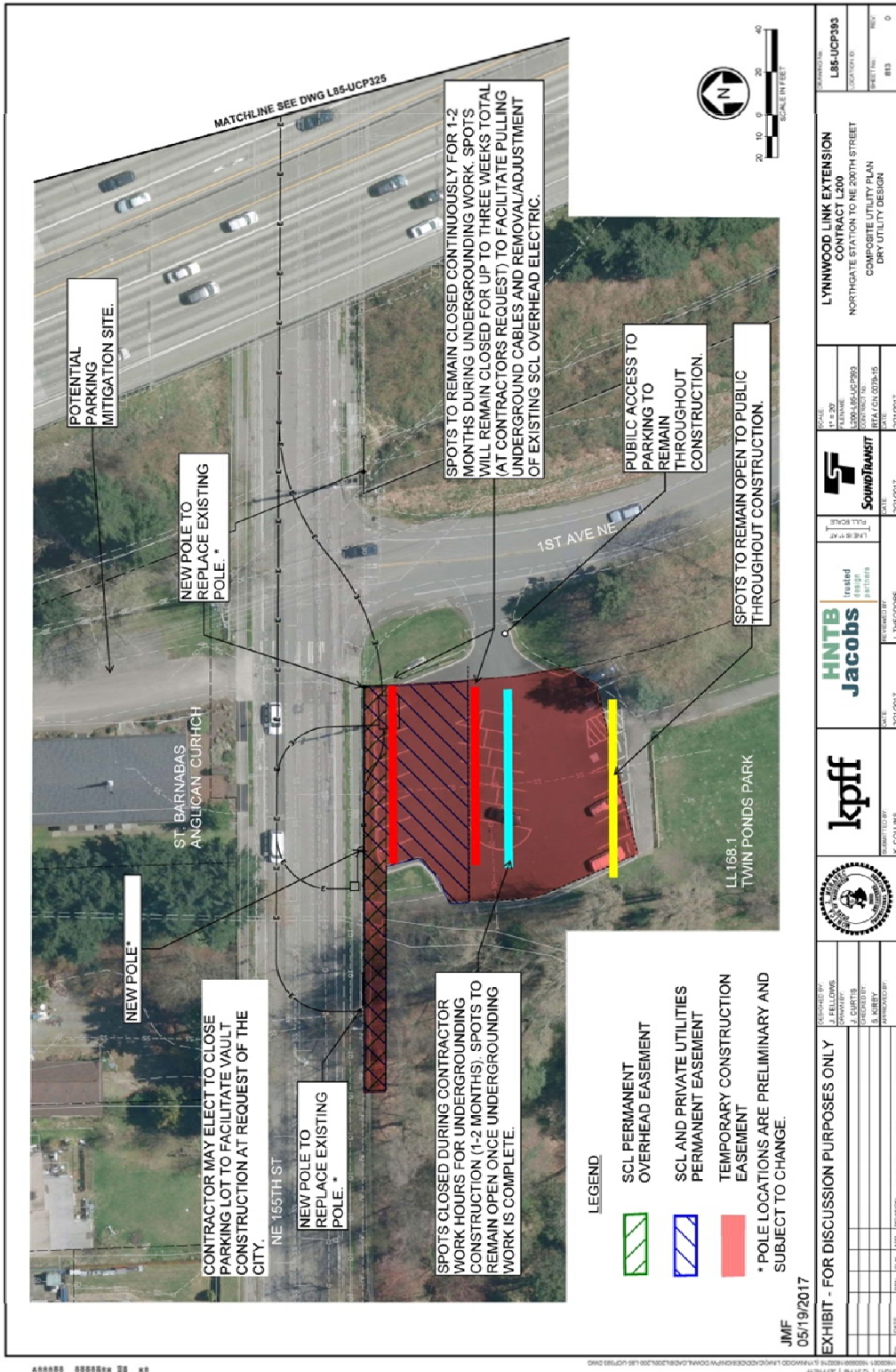
Attachments



Figure 1
 Lynwood Link Extension Twin Ponds Park – Area of Potential Effects



Figure 2
Lynnwood Link Extension Twin Ponds Park – Area of Potential Effects



SOURCE: KPFF 2017

Figure 3
 Lynnwood Link Extension Twin Ponds Park – Proposed Work



SOURCE: ESA

Figure 4
View west from the corner of 155th Street and 1st Avenue.

CULTURAL RESOURCES REPORT COVER SHEET

Author: Chris Lockwood, Ph.D., Alicia Valentino, Ph.D., and Katherine F. Wilson, M.A.

Title of Report: Sound Transit Lynnwood Link, Cultural Resource Literature Review of Twin Ponds Park Project, Shoreline, King County, Washington.

Date of Report: October 2017

County(ies): King Section: 17 Township: 26N Range: 4E

Quad: North Seattle 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.



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memorandum

date October 4, 2017

to Steven Kennedy, Senior Environmental Planner, Sound Transit
Elma Borbe, Environmental Planner, Sound Transit

from Chris Lockwood, Ph.D., Alicia Valentino, Ph.D., and Katherine F. Wilson, M.A.

subject Contract No. D120673, Work Order 72 – NEPA/SEPA Support for Sound Transit Lynnwood Link, Cultural Resource Literature Review of Twin Ponds Park Project, Shoreline, King County, Washington.

Environmental Science Associates (ESA) was retained by Sound Transit (ST) to support the Lynnwood Link Extension by conducting an archaeological literature review in advance of proposed construction within Twin Ponds Park (Park) in Shoreline, King County, Washington. The Park is located within Township 26 North, Range 4 East, Section 17, Willamette meridian, on the Seattle North, Washington 7.5' series topographic map (Figures 1 and 2). The Park is on King County parcel #2881700590 and is owned by the City of Shoreline.

Project Description

The Lynnwood Link Extension Project (Project) will extend the Sound Transit Link Light rail system from Northgate in Seattle into Shoreline, Mountlake Terrace, and Lynnwood in Snohomish County. It will help implement the Puget Sound Regional Council's (PSRC) VISION 2040 (PSRC 2009, updated 2014) and the Sound Transit Regional Transit Long Range Plan (Sound Transit 2005, updated 2014) and is part of the Sound Transit 2 (ST2) Plan of regional transit investments. The 8.5-mile project corridor generally follows Interstate 5 (I-5).

As part of the final design phase for the Project, ST has determined that relocation of utilities will be needed within the northern part of the Park (Figure 3). Proposed work includes:

- Replacement of two existing Seattle City Light (SCL) electrical poles with three new poles;
- Construction of a new, below-ground electrical vault;
- Construction of two private telecommunications vaults; and
- Installation of approximately 250 linear feet of underground duct bank.

Regulatory Context

The Project is partially funded by the Federal Transit Administration (FTA). As a federally-funded project, the Project is subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA as amended) and 36

CFR Part 800. Section 106 requires that federal agencies identify and assess the effects of their undertakings on historic properties and to consult with others to find ways to avoid or mitigate adverse effects.

The FTA is the lead federal agency under the National Environmental Policy Act (NEPA) on the project and is responsible for required findings and determinations (36CFR 800.2(a)(3)). The State Historic Preservation Office (SHPO) advises and assists federal agencies with complying with Section 106 responsibilities (800.2(c)(1)(i)). ST is the project proponent and the lead agency under the State Environmental Policy Act (SEPA). As part of the FEIS process, FTA and Sound Transit have consulted with the Muckleshoot Indian Tribe, Suquamish Tribe, Tulalip Tribe, Snoqualmie Tribe, Stillaguamish Tribe of Nations, and Yakama Nation. None of these parties has identified any potential for a traditional cultural property within the Area of Potential Effect (APE) of the project. Figures 1 and 2 illustrate the existing APE for the project and proposed APE for the utility work.

Background

Near surface geological sediments within the Park are mapped as Vashon-age glacial till (Figure 4), deposited during the last advance and retreat of glacial ice into the Seattle area approximately 17,400 to 16,400 years ago (Minard 1983). The Park is situated in a low-lying area, which accumulated silt and peat as a bog. As discussed below, peat mining in the 1940s and 1950s created the two ponds for which the park is named (City of Shoreline 2017). Due to the Park's urban setting, the Natural Resources Conservation Service does not maintain soils data for this area (NRCS 2017), but soils would be expected to contain high amounts of silt and peat, as well as possibly urban fill material.

The Twin Ponds Park is within the traditional territory of ancestors of the members of today's Tulalip Tribes. The Park is located within lands ceded to the United States by Native groups under the Treaty of Point Elliott in 1855. Signatories included members of the Skagit, Snohomish, Snoqualmie, Suiattle, Samish, and Stillaguamish. The Treaty established the Tulalip Reservation where members of several distinct groups were relocated to live together after the signing. In 1934, the Tulalip Tribes organized as a federally-recognized entity under the Indian Reorganization Act (Tulalip Tribes 2017).

The Tulalip Tribes are considered part of a shared Southern Coast Salish culture group (Haeberlin and Gunther 1930; Suttles and Lane 1990). The groups who relocated to the Tulalip Reservation traditionally spoke a common dialect of the Northern Lushootseed language (Suttles and Lane 1990:485). Substance patterns among the Southern Coast Salish, including the Tulalip Tribes, included seasonal plant gathering, fishing, hunting, and preserving resources in winter months. Accounts of early non-Native settlers describe Native peoples gathering cranberries in the vicinity of today's Twin Ponds Park and nearby Ronald Bog Park (Copass 1996:4). In addition to cranberries, these areas likely provided a variety of other plant resources such as rushes and reeds for consumption, medicinal, and other uses.

When surveyed in 1859, no notable features, such roads, homesteads, or trails, were mapped in the vicinity of the Park (US Surveyor General 1859). In 1872, Marshall Blinn filed a land claim that included the area of the park. Little is known about Blinn, and review of the Washington Territorial census was unable to determine his occupation or other biographical details. By 1904, 320 acres of Blinn's claim was owned by Allen P. and Sarah Mitten, husband and wife, who subdivided the property into the Green Lake Five Acre Tracts (Anderson Map Company 1907; Kroll Map Company 1912, 1926; Metsker Map Company 1936; Wright 1904). Allen P. and Sarah Mitten were listed in the 1910 US Federal Census (US Census Bureau 1910) as white, aged 65 and 45

respectively, living off their own income with son Robert and daughter Marion at 1415 Seventeenth Avenue, which is outside of the project's original (APE).

The two ponds which give Twin Ponds Park its name do not appear on late 19th or early 20th century maps or photos (US Surveyor General 1859; Anderson Map Company 1907; Kroll Map Company 1912, 1926; Metsker Map Company 1936; USGS 1895; Pacific Aerial Survey 1937). Rather, the ponds were created as a result of peat mining in the 1940s and 1950s (City of Shoreline 2017), and they can be seen on 1954 aerial photograph (King County 1954). Additional changes to the area occurred during the 1960s when a segment of 1st Avenue NE was realigned to accommodate construction of Interstate 5 (USGS 1949, 1968).

The Park was originally part of the King County park system and was known as "South Central Park" (City of Shoreline 2017). King County Assessor's records show the Park contains a 400-square-foot masonry restroom that was constructed in 1964, indicating that conversion of the property to recreational use had occurred by this point. The structure is visible on aerials from this general time period (HistoricAerials.com 1968, 1969; King County 1965). Around this time the north end of the Park also was cleared and crisscrossed with dirt access roads (HistoricAerials.com 1968, 1969; King County 1965). The City of Shoreline acquired the Park following passage of Forward Thrust King County Proposition 6, which passed in 1968, with acquisition completed in 1970 (State of Washington 2017).

The Washington State Department of Archaeology and Historic Preservation's (DAHP) statewide predictive model classifies the APE as "High Risk - Survey Advised" (DAHP 2010). A records search of DAHP's Washington Information System for Architectural and Archaeological Records Data (WISAARD) database on June 23, 2017 showed no archaeological sites recorded within vicinity of the Park. One cultural resources survey and one historic property inventory have been conducted within or adjacent to the Park. The 1996 inventory of aboveground historic properties within the City of Shoreline encompassed the Park, but no resources were recorded within the Park itself (Copass 1996). Baldwin and Solmo (2014) conducted an archaeological survey within Park boundaries in advance of a proposed AT&T telecommunication facility. The survey, which occurred south of the current APE, included pedestrian reconnaissance and one shovel probe. The surveyors identified highly disturbed sediment from previous construction and suggested the potential for intact cultural resources to be extremely low. Based on this information and the proximity of the APE to North 155th Street and existing utilities, ESA recommends that the likelihood for intact archaeological deposits within the APE is moderately low to low; if archaeological deposits were, in fact, present, construction of the road, parking lot, and sidewalks, as well as utility trenching is likely to have disturbed them.

Pedestrian Reconnaissance

ESA Archaeologist Alicia Valentino performed pedestrian reconnaissance of the APE, but observed no archaeological resources. The APE consists primarily of a paved, level parking lot, which is not amenable to traditional archaeological subsurface survey methods, such as shovel probing or trenching. Since the topography surrounding the parking lot is slightly undulating and lower, it appears that some grading and filling was required during construction of the lot. The APE also includes a thin grassy strip adjacent to the northern edge of the parking lot. The grass strip contains utility poles and fencing, and is more heavily vegetated towards the west. The location of the strip between the parking lot and the sidewalk, as well as the presence of utilities and fencing, and the nearby presence of the roadway, suggests that soils in this area are very likely disturbed and not amenable to preconstruction archaeological survey.

Recommendation

Based on the results of this literature review, field visit, and current land use, ESA recommends:

- Concurrence with the revised Area of Potential Effect
- Concurrence that there are No Historic Properties Affected within the APE (Twin Ponds Park).
- Concurrence that no further archaeological work associated with the proposed work at Twin Ponds Park is needed.

ST will continue to distribute, implement, and follow the existing inadvertent discovery plan (IDP) that has been developed for the Lynnwood Link Extension (Valentino 2017).

Sources Consulted

Anderson Map Company

- 1907 *Anderson's Atlas of King County*. Electronic document, <http://www.historicmapworks.com/Map/US/1250065/Page+9+++Township+26+North++Range+4+East/King+County+1907/Washington/>, accessed June 26, 2017.

Baldwin, Garth and Keith Solmo

- 2014 *Cultural Resources Review for the AT&T Mobility Project, SA1304 Twin Ponds, Shoreline, King County, Washington*. Prepared for Adapt Engineering, Inc. by Drayton Archaeology, Bellingham, WA. On file, Washington State Department of Archaeology and Historic Preservation, Olympia, WA.

City of Shoreline

- 2017 *Twin Ponds Community Garden*. Electronic document, <http://www.shorelinewa.gov/government/departments/parks-recreation-cultural-services/projects-and-plans/twin-ponds-community-garden>, accessed July 5, 2017.

Copass, Cloantha

- 1996 *Historic Resources Survey and Inventory Update for the City of Shoreline*. Prepared for the City of Shoreline and the King County Historic Preservation Program by the King County Historic Preservation Program, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia, WA.

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- 2010 *Statewide Predictive Model*. Last updated 2010. Electronic document, <http://www.dahp.wa.gov/>, accessed June 23, 2017.

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- 1930 *Indians of Puget Sound*. University of Washington Press, Seattle, WA.

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- 1969 Aerial Coverage. Available at www.HistoricAerials.com, accessed June 26, 2017.

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- 1954 Aerial Photograph, Township 26 North, Range 4 East, Section 17. Electronic document, <http://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=KcVgzVKP4Jo1>, accessed June 23, 2017.
- 1965 Aerial Photograph, Township 26 North, Range 4 East, Section 17. Electronic document, <http://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=kGr1v2bXzwM1>, accessed June 23, 2017.

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- 2017 *Web Soil Survey*. Electronic document, <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>, accessed July 5, 2017.

Pacific Aerial Surveys, Inc.

- 1937 Aerial Photograph, Township 26 North, Range 4 East, Section 17. Electronic document, <http://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=sFMDIEJpLGY1>, accessed June 23, 2017.

Shoreline Historical Museum

- 2017 *Heritage Highlights for September: Ronald Bog and its Man-made Lake*. Electronic resource, <http://shorelinehistoricalmuseum.org/heritage-highlights/>, accessed June 27, 2017.

Sound Transit

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Sound Transit and Federal Transit Administration

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- 1895 *Snohomish, WA. 30' Series Quadrangle*. US Geological Survey, Reston, VA.
1949 *Seattle North, WA. 7.5' Series Quadrangle*. US Geological Survey, Reston, VA.
1968 *Seattle North, WA. 7.5' Series Quadrangle*. US Geological Survey, Reston, VA.

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- 1859 *Township 26 North, Range 4 East Survey Map*. Electronic document, https://www.blm.gov/or/landrecords/survey/yPlatView1_2.php?path=PWA&name=t260n040e_001.jpg, accessed June 23, 2017.

Valentino, Alicia

- 2017 *Archaeological Resources Monitoring and Inadvertent Discovery Plan for the Lynnwood Link Extension Project, King and Snohomish County, Washington*. Submitted by Environmental Science Associates to Sound Transit.

Wright, P. F.

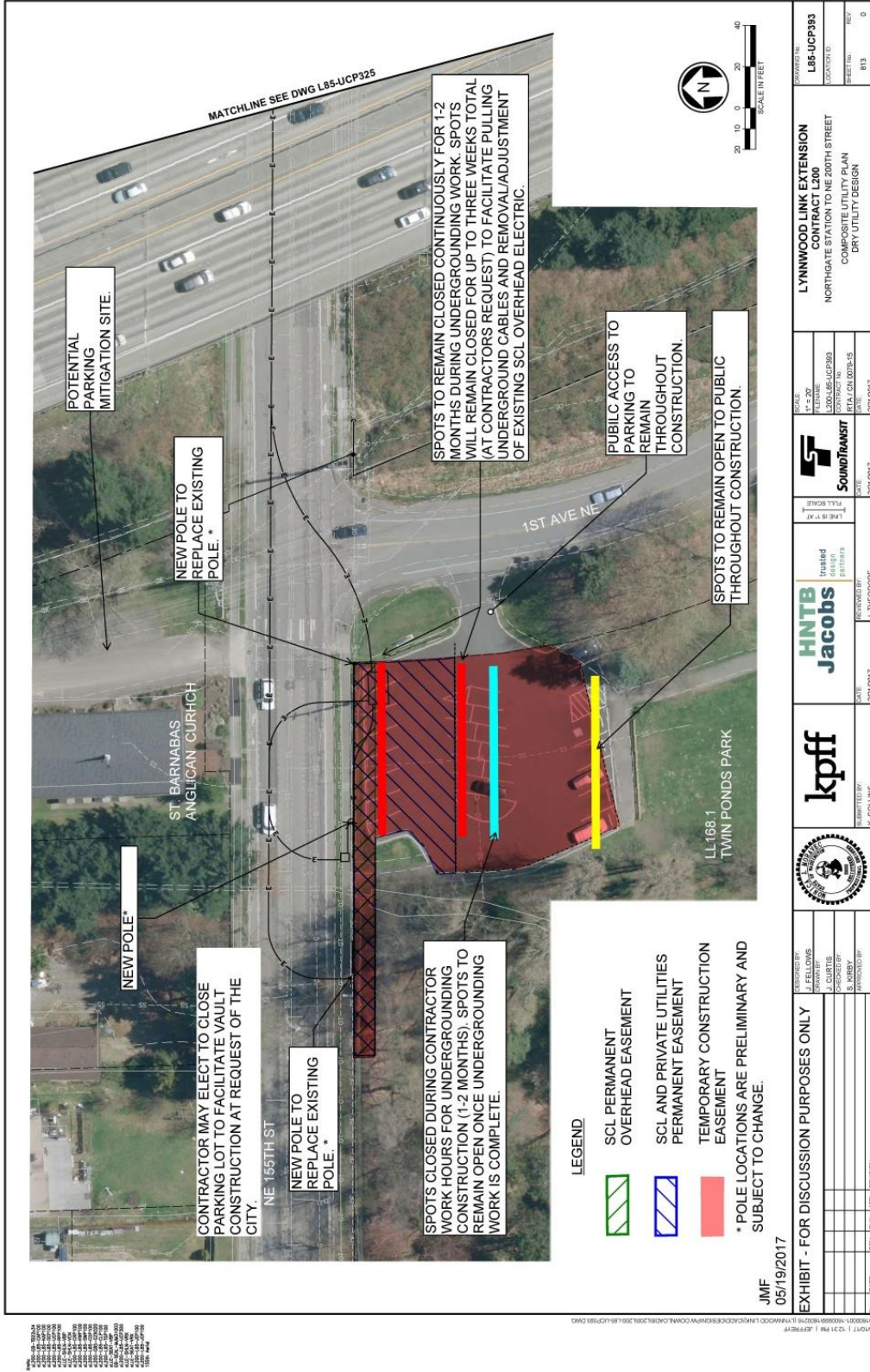
- 1904 Green Lake Five Acre Tracts [plat]. Prepared by Gardner and Gardner Engineers for A.P and Sarah H. Mitten. On file, King County Assessor.



Figure 1
Lynnwood Link Extension Twin Ponds Park – Area of Potential Effects



Figure 2
Lynnwood Link Extension Twin Ponds Park – Area of Potential Effects



SOURCE: KPFF 2017

Figure 3
 Lynnwood Link Extension Twin Ponds Park – Proposed Work



SOURCE: USGS

Figure 4
Lynnwood Link Extension Twin Ponds Park – Near Surface Geology



SOURCE: ESA

Figure 5
View west from the corner of 155th Street and 1st Avenue.



SOURCE: ESA

Figure 6
View east from the northwest corner of the APE. Proposed ductbank would be installed to the right of the utility pole.



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

January 17, 2018

Mr. Mark Assam
Federal Transit Administration
915 Second Ave
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Seattle, WA 98174-1002

In future correspondence please refer to:
Project Tracking Code: 100611-07-FTA
Property: Sound Transit's Lynnwood Link Extension Light Rail Project
Re: APE Revision (Twin Ponds Park), Continued No Adverse Effect

Dear Mr. Assam:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding Sound Transit's Lynnwood Link Extension project and the expansion of the area of potential effect into the Twin Ponds Park area. This action has been reviewed 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 contained in your communication.

First, I have no comment on the expanded area of potential effect (APE) as mapped in the survey report. We also concur, based on your consultant's work, that utility work to occur within the expanded APE will not change the overall project determination of no adverse effect. 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. If you have any questions, please feel free to contact me.

Sincerely,

Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov



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