



ATTACHMENT G4-6

Tribal and Agency Correspondence

From: [Stevenson, Alex](#)
To: [Laura Murphy](#)
Cc: [Kennedy, Steven](#); [Rehmat, Hussein](#)
Subject: Sound Transit's OMF South - cultural resource survey plan
Date: Monday, January 13, 2020 12:43:00 PM
Attachments: [AE 0030-17 9.5.7 Historic and Cultural Technical Report Final.pdf](#)
[image001.jpg](#)

Good morning –

Attached is a cultural resources survey plan for Sound Transit's proposed Operations and Maintenance Facility – South (OMFS) Project. This project is currently in environmental review and Sound Transit is preparing a SEPA EIS. No federal funding is planned. If a federal approval or permit is determined to be needed later, appropriate NEPA and Section 106 documentation will be completed. The OMFS facility will support expanded light rail service resulting from the entire ST3 program in King and Pierce counties.

Currently, there are three alternative locations for the facility with associated rail guideway: the Midway Landfill in the City of Kent, and two sites in the City of Federal Way. There is no preferred alternative at this time. With the two Federal Way site alternatives, about a mile of future guideway track from the terminus of Federal Way Link Extension southward to connect the two sites would also function as a portion of the future guideway for the Tacoma Dome Link Extension project (TDLE), which extends light rail from Federal Way to Tacoma. Sound Transit coordinated with the Federal Transit Administration (FTA), which is the lead federal agency for TDLE, to confirm OMFS and TDLE have independent utility. As a result, they are being evaluated in separate EISs. It is important that the OMFS and TDLE projects be considered separate for environmental review and permitting purposes because of their differing regulatory frameworks and associated environmental requirements.

We are sending this document to you for your review and kindly request comments on the document within 30 days of its receipt. We anticipate starting cultural resources fieldwork described in this document on February 10, 2019. We will notify you of our official start date for fieldwork and invite you to visit or monitor the work at that time.

We appreciate your review and look forward to answering any comments or questions you may have on this project. Please email Alex Stevenson, Sound Transit's Cultural Resources Program Manager at alex.stevenson@soundtransit.org or contact Alex by phone at 206-553-3655.

Thank you,

Alex E. Stevenson

Cultural Resources Program Manager

Sound Transit

Desk: 206-553-3655

Mobile: 206-419-5315

Pronouns: He/Him/His

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From: [Stevenson, Alex](#)
To: bullchild.annette@nisqually-nsn.gov
Cc: [Kennedy, Steven](#); [Rehmat, Hussein](#); [Hayes, Dezerae](#)
Subject: Sound Transit's OMF South - cultural resource survey plan
Date: Monday, January 13, 2020 12:45:00 PM
Attachments: [AE 0030-17 9.5.7 Historic and Cultural Technical Report Final.pdf](#)
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Alex E. Stevenson

Cultural Resources Program Manager

Sound Transit

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Mobile: 206-419-5315

Pronouns: He/Him/His

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From: [Stevenson, Alex](#)
To: [Brandon Reynon](#)
Cc: [Kennedy, Steven](#); [Rehmat, Hussein](#); [Hayes, Dezerai](#)
Subject: Sound Transit's OMF South - cultural resource survey plan
Date: Monday, January 13, 2020 12:44:00 PM
Attachments: [AE 0030-17 9.5.7 Historic and Cultural Technical Report Final.pdf](#)
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Alex E. Stevenson

Cultural Resources Program Manager

Sound Transit

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From: [Stevenson, Alex](#)
To: kate@yakama.com
Cc: [Kennedy, Steven](#); [Rehmat, Hussein](#); [Hayes, Dezerai](#)
Subject: Sound Transit's OMF South - cultural resource survey plan
Date: Monday, January 13, 2020 12:47:00 PM
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Alex E. Stevenson

Cultural Resources Program Manager

Sound Transit

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

August 19, 2021

Ms. Sunshine Clark Schmidt
Bonneville Power Administration
PO Box 3621
Portland, OR. 97208

In future correspondence please refer to:
Project Tracking Code: 2020-12-07557
Property: King County_ Sound Transit Line Raises Project
Re: NO Adverse Effect

Dear Ms. Clark Schmidt:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. 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.

We concur that the current project as proposed will have "NO ADVERSE EFFECT" on historic properties within the APE that are listed in, or determined eligible for listing in, the National Register of Historic Places. 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,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov





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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
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Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

July 20, 2023

The Honorable Jaison Elkins
Chairman
Muckleshoot Indian Tribe
39015 172nd Avenue SE
Auburn, Washington 98092

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the Operations and Maintenance Facility (OMF) South Project (the Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with your tribe, and requests feedback on the proposed Area of Potential Effects (APE).

The Project would provide a facility in the South Corridor of Sound Transit 3 (ST3), Sound Transit's regional system plan, to receive, test, commission, store, maintain, and deploy vehicles for the system-wide light rail expansion. Alternatives being evaluated include a No-Build alternative, the South 336th Street alternative (Preferred Alternative), the South 344th Street alternative, and the Midway Landfill alternative. The Preferred and South 344th Street alternatives are in Sections 16 and 21 of Township 21 North, Range 4 East. The Midway Landfill alternative is in Sections 21 and 22 of Township 22 North, Range 4 East.

The build alternatives range in size from approximately 65 to 70 acres in the cities of Federal Way and Kent. Each alternative includes tracks connecting the OMF to the Federal Way Link Extension light rail line that will be operating when the OMF South is planned to open. The length and location of these connecting tracks varies by alternative.

The proposed APE is shown in the enclosed map set. The proposed APE generally extends from elements of the Project alternatives (e.g., guideway, station locations, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to Project elements.

Pursuant to 36 CFR Part 800, FTA respectfully requests your comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Justin Zweifel at (206) 220-7538 or justin.zweifel@dot.gov.

FTA has also sent you a separate letter inviting you to participate in the environmental review process under the National Environmental Policy Act (NEPA) as participating agency.

Thank you for your consultation on the Project.

Sincerely,

Susan Fletcher
Acting Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Madrienne White, Public and Government Relations Manager, Muckleshoot Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Maureen Elenga, Architectural Historian, Washington Department of Archaeology and
Historic Preservation
Alex Stevenson, Cultural Resources Manager, Sound Transit

Enclosure: Proposed Area of Potential Effects



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July 20, 2023

The Honorable Willie Frank III
Chairman
Nisqually Tribe
4820 She-Nah-Num Drive SE
Olympia, Washington 98513

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Frank III:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the Operations and Maintenance Facility (OMF) South Project (the Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with your tribe, and requests feedback on the proposed Area of Potential Effects (APE).

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The build alternatives range in size from approximately 65 to 70 acres in the cities of Federal Way and Kent. Each alternative includes tracks connecting the OMF to the Federal Way Link Extension light rail line that will be operating when the OMF South is planned to open. The length and location of these connecting tracks varies by alternative.

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Thank you for your consultation on the Project.

Sincerely,

Susan Fletcher
Acting Regional Administrator

cc: Jackie Wall, THPO, Nisqually Tribe
Brad Beach, THPO, Nisqually Tribe
Annette Bullchild, THPO, Nisqually Tribe
Jeremy Perkuhn, THPO, Nisqually Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Maureen Elenga, Architectural Historian, Washington Department of Archaeology and
Historic Preservation
Alex Stevenson, Cultural Resources Manager, Sound Transit

Enclosure: Proposed Area of Potential Effects



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July 20, 2023

The Honorable Bill Sterud
Chairman
Puyallup Tribe of the Puyallup Reservation
3009 Portland Avenue
Tacoma, Washington 98404

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Sterud:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the Operations and Maintenance Facility (OMF) South Project (the Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with your tribe, and requests feedback on the proposed Area of Potential Effects (APE).

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Thank you for your consultation on the Project.

Sincerely,

Susan Fletcher
Acting Regional Administrator

cc: Brandon Reynon, Cultural Resources, Puyallup Tribe of the Puyallup Reservation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Maureen Elenga, Architectural Historian, Washington Department of Archaeology and
Historic Preservation
Alex Stevenson, Cultural Resources Manager, Sound Transit

Enclosure: Proposed Area of Potential Effects



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July 20, 2023

The Honorable Robert de los Angeles
Chairman
Snoqualmie Indian Tribe
PO Box 969
Snoqualmie, Washington 98065

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman de los Angeles:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the Operations and Maintenance Facility (OMF) South Project (the Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with your tribe, and requests feedback on the proposed Area of Potential Effects (APE).

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Sincerely,

Susan Fletcher
Acting Regional Administrator

cc: Steven Moses, Cultural Resources, Snoqualmie Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian, Washington Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Manager, Sound Transit

Enclosure: Proposed Area of Potential Effects



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July 20, 2023

The Honorable Kristopher Peters
Chairman
Squaxin Island Tribe of the Squaxin Island Reservation
10 SE Squaxin Lane
Shelton, Washington 98584

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Peters:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the Operations and Maintenance Facility (OMF) South Project (the Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with your tribe, and requests feedback on the proposed Area of Potential Effects (APE).

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Susan Fletcher
Acting Regional Administrator

cc: Rhonda Foster, THPO, Squaxin Island Tribe of the Squaxin Island Reservation
Shaun Dinubilo, Cultural Resources, Squaxin Island Tribe of the Squaxin Island
Reservation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Maureen Elenga, Architectural Historian, Washington Department of Archaeology and
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Alex Stevenson, Cultural Resources Manager, Sound Transit

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July 20, 2023

The Honorable Leonard Forsman
Chairman
Suquamish Indian Tribe of the Port Madison Reservation
PO Box 498
Suquamish, Washington 98392

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Forsman:

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Acting Regional Administrator

cc: Dennis Lewarch, THPO, Suquamish Indian Tribe of the Port Madison Reservation
Stephanie Trudel, Cultural Resources, Suquamish Indian Tribe of the Port Madison
Reservation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Maureen Elenga, Architectural Historian, Washington Department of Archaeology and
Historic Preservation
Alex Stevenson, Cultural Resources Manager, Sound Transit

Enclosure: Proposed Area of Potential Effects



U.S. Department
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July 20, 2023

The Honorable Gerald Lewis
Chairman
Confederated Tribes and Bands of the Yakama Nation
401 Fort Road
Toppenish, Washington 98948

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Lewis:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the Operations and Maintenance Facility (OMF) South Project (the Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with your tribe, and requests feedback on the proposed Area of Potential Effects (APE).

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The build alternatives range in size from approximately 65 to 70 acres in the cities of Federal Way and Kent. Each alternative includes tracks connecting the OMF to the Federal Way Link Extension light rail line that will be operating when the OMF South is planned to open. The length and location of these connecting tracks varies by alternative.

The proposed APE is shown in the enclosed map set. The proposed APE generally extends from elements of the Project alternatives (e.g., guideway, station locations, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to Project elements.

Pursuant to 36 CFR Part 800, FTA respectfully requests your comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Justin Zweifel at (206) 220-7538 or justin.zweifel@dot.gov.

FTA has also sent you a separate letter inviting you to participate in the environmental review process under the National Environmental Policy Act (NEPA) as participating agency.

Thank you for your consultation on the Project.

Sincerely,

Susan Fletcher
Acting Regional Administrator

cc: Jerry Meninick, Deputy Director of Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Kate Valdez, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Casey Barney, Cultural Resources, Confederated Tribes and Bands of the Yakama Nation
Holly Shea Barrick, Archaeologist, Confederated Tribes and Bands of the Yakama Nation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian, Washington Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Manager, Sound Transit

Enclosure: Proposed Area of Potential Effects



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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3192
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

July 20, 2023

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

**Subject: Sound Transit
Operations and Maintenance Facility South Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the Operations and Maintenance Facility (OMF) South Project (the Project). Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with the Washington State Historic Preservation Officer (SHPO), and requests feedback on the proposed Area of Potential Effects (APE).

The Project would provide a facility in the South Corridor of Sound Transit 3 (ST3), Sound Transit's regional system plan, to receive, test, commission, store, maintain, and deploy vehicles for the system-wide light rail expansion. Alternatives being evaluated include a No-Build alternative, the South 336th Street alternative (Preferred Alternative), the South 344th Street alternative, and the Midway Landfill alternative. The Preferred and South 344th Street alternatives are in Sections 16 and 21 of Township 21 North, Range 4 East. The Midway Landfill alternative is in Sections 21 and 22 of Township 22 North, Range 4 East.

The build alternatives range in size from approximately 65 to 70 acres in the cities of Federal Way and Kent. Each alternative includes tracks connecting the OMF to the Federal Way Link Extension light rail line that will be operating when the OMF South is planned to open. The length and location of these connecting tracks varies by alternative.

The proposed APE is shown in the enclosed map set. The proposed APE generally extends from elements of the Project alternatives (e.g., guideway, station locations, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to Project elements. Prior to federalizing the Project, Sound Transit consulted with your office on the project, built environment resources, and archaeological resources (**DAHP Log # 2020-02-01045**). The proposed APE is consistent with the area of impacts identified through that earlier consultation. However, the Project will now comply with the relevant federal statutes and regulations required for NEPA, including Section 106.

FTA will contact the following tribes to notify them of the undertaking, initiate Section 106 consultation, and request their comments: Confederated Tribes and Bands of the Yakama Nation; Muckleshoot Indian Tribe; Nisqually Indian Tribe; Puyallup Tribe of Indians; Snoqualmie Indian Tribe; Squaxin Island Tribe of the Squaxin Island Reservation; and the Suquamish Indian Tribe of the Port Madison Reservation. FTA looks forward to responding to any concerns these tribes may identify and will notify you of any such concerns.

Pursuant to 36 CFR Part 800, FTA respectfully requests your comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Justin Zweifel at (206) 220-7538 or justin.zweifel@dot.gov.

FTA has also sent you a separate letter inviting you to participate in the environmental review process under the National Environmental Policy Act (NEPA) as participating agency.

Thank you for your consultation on the Project.

Sincerely,

Susan Fletcher
Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Maureen Elenga, Architectural Historian – Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation
Alex Stevenson, Cultural Resources Manager, Sound Transit

Enclosure: Proposed Area of Potential Effects



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

July 24, 2023

Susan Kay Fletcher
Acting Regional Administrator
US Department of Transportation
Federal Transit Administration, Region X

In future correspondence please refer to:
Project Tracking Code: 2020-02-01045
Property: Sound Transit Operations and Maintenance Facility South (OMFS)
Re: Archaeology - APE Concur

Dear Susan Kay Fletcher:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the area of potential effect (APE).

We concur with your definition of the APE. Please provide us with your survey methodology before proceeding with any inventories. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/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 SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Maureen Elenga, M.A.
Transportation Reviewer
(360) 972-4539
Maureen.Elenga@dahp.wa.gov





NISQUALLY INDIAN TRIBE
Tribal Historic Preservation Office

4820 She-Nah-Num Drive S.E.
Olympia, Washington 98513
360.456.5221 (main)
877.768.8886 (toll free)
www.nisqually-nsn.gov

July 31, 2023

To: Justin Zweifel
Region 10 Environmental Protection Specialist
Federal Transit Administration
U.S. Department of Transportation

Re: Sound Transit Operations and Maintenance Facility South Project

The Nisqually Indian Tribe's THPO has reviewed the Section 106 consultation letter and supplemental materials that you provided for the above-named project and has no specific comments or concerns regarding the four build options. Please keep us informed if there are any Inadvertent Discoveries of Archaeological Resources/Human Burials.

Although the Nisqually Indian Tribe doesn't have any specific concerns at this time, we respect the traditional cultural knowledge of affected tribes and support their opinions on this matter as well.

Sincerely,

Brad Beach, THPO
Nisqually Indian Tribe
360-528-1084
360-456-5221 ext 1277
beach.brad@nisqually-nsn.gov

cc: Annette Bullchild, Director, Nisqually Indian Tribe



ATTACHMENT G4-7

Inadvertent Discovery Plan

Operations and Maintenance Facility South

Inadvertent Discovery Plan

May, 2023

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Appendices

Appendix A: On-Site Inadvertent Discovery Guide

Inadvertent Discovery Plan

Operation and Maintenance Facility South

1 Introduction

This Inadvertent Discovery Plan (IDP) has been developed by Sound Transit (ST) for use during ground-disturbing activities for the Operation and Maintenance Facility (OMF) South. This IDP describes the protocols to be followed by personnel working on the OMF South project if archaeological resources are discovered during ground-disturbing activities.

1.1 Project Description

Sound Transit proposes to construct and operate an operations and maintenance facility in its South Corridor (OMF South) to meet agency needs for an expanded fleet of light rail vehicles (LRVs). The need to expand LRV maintenance capacity was identified in Sound Transit 3: The Regional Transit System Plan for Central Puget Sound (Sound Transit 3). OMF South would be used to store, maintain, and deploy a minimum of 160 LRVs for daily service. It would provide facilities for vehicle storage, inspections, maintenance and repair, interior vehicle cleaning, and exterior vehicle washing. Additionally, the facility would receive, test, and commission new LRVs for the entire light rail system.

OMF South would also be used to accommodate administrative and operational functions, such as serving as a report base for LRV operators. Included is a Maintenance of Way (MOW) building for maintenance and storage of spare parts for tracks, vehicle propulsion equipment, train signals, and other infrastructure, in addition to storage facilities for the entire Link system. Other facility elements would include employee and visitor parking, operations staff offices, maintenance staff offices, dispatcher work stations, an employee report room, and areas with lockers, showers, and restrooms for both operators and maintenance personnel.

1.2 Regulatory Environment

OMF South must comply with multiple federal, state, and local environmental laws, regulations, and policies for environmental review. A brief discussion of these and their consideration of cultural resources is presented below.

FTA is the lead agency under the National Environmental Policy Act (NEPA). Under NEPA, cultural resources encompass a wide range of resources including, but not limited to, sacred sites, archaeological and built environment resources not eligible for the NRHP, archaeological and built environment resources eligible for the NRHP, and archaeological collections.

As federal funding is anticipated and the project is defined as a federal undertaking, it is subject to compliance with Section 106 of the NHPA, as amended, and its implementing regulations described in 36 Code of Federal Regulations (CFR) Part 800. Section 106 requires that federal agencies account for the effects of their undertakings on historic properties. A historic property is typically aged 50 years or older and is defined in 36 CFR Part 800.16(1)(1) as follows:

... any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

Regulations at 36 CFR Part 800 require the federal agency involved in the undertaking to identify the APE, conduct an inventory of historic properties that may be located within the APE, determine whether any of the historic properties identified are eligible for listing in the National Register of Historic Places (NRHP), and determine whether NRHP-eligible properties will be affected by the undertaking. An APE is defined in 36 CFR 800.16(d) as follows:

... the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking ...

In addition to Section 106, Section 4(f) of the U.S. Department of Transportation Act of 1966 is triggered by funding or approval from a federal agency for a project that proposes “use” of historic property. A determination of adverse effect under Section 106 generally constitutes a use under Section 4(f).

The project must also comply with Washington State Environmental Policy Act (SEPA). Sound Transit is the lead agency for SEPA compliance. The project is subject to other Washington state laws that address the protection of archaeological sites and Native American burials. For example, the Archaeological Sites and Resources Protection Act (Revised Code of Washington [RCW] 27.53), prohibits disturbance of known precontact and historic archaeological sites on public or private lands. The Indian Graves and Records Act (RCW 27.44) prohibits disturbance of Native American graves and provides that inadvertent disturbance through construction or other activity requires reinterment under supervision of the appropriate tribes.

Certified Local Governments (CLGs) are considered the experts on whether resources meet the criteria for local listing in city or county registers of historic places. Consulting parties, including SHPO, provide expert opinions on whether a proposed project has the potential to adversely impact cultural resources.

2 Archaeological Resources

On-site staff will follow the procedures described below and illustrated in the flowchart on Figure 1 - Standard Inadvertent Discovery Process for Archaeological Resources on FTA Region 10 Projects. The contact phone tree and examples of archaeological resources are provided in Appendix A - On-Site Inadvertent Discovery Guide.

An archaeological resource could be prehistoric or historic. When in doubt, assume the material is an archaeological resource.

Examples of prehistoric archaeological materials include:

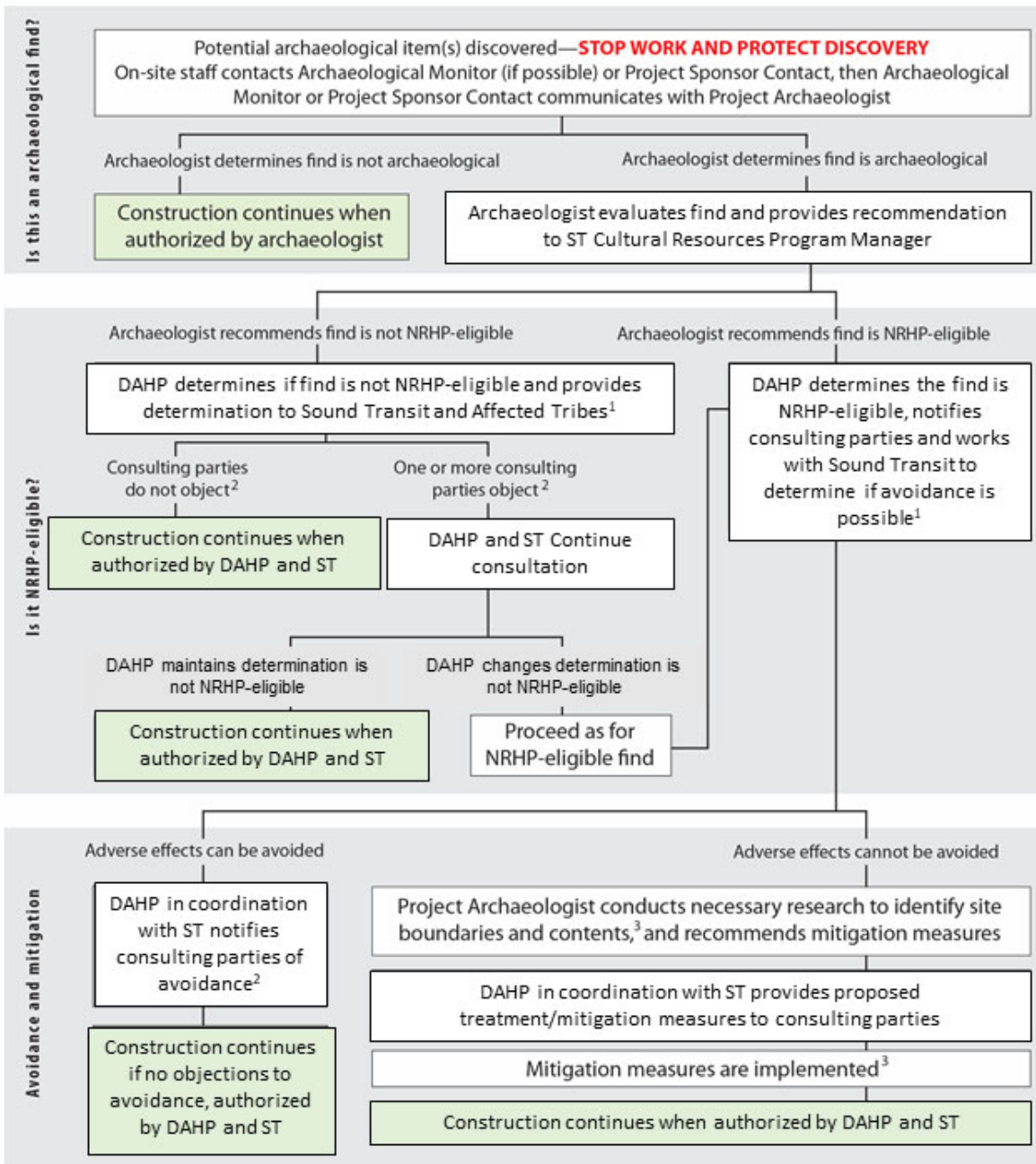
- An accumulation of shell, burnt rocks, or other food-related materials
- Bones or small pieces of bone
- An area of charcoal or very dark stained soil with artifacts
- Stone tools or waste flakes (i.e., an arrowhead or stone chips)
- Basketry, cordage, or rope
- Wooden posts or stakes

Examples of potentially historic archaeological materials include:

- Domestic ceramics (such as tableware, crockery, etc.) and industrial ceramics (such as insulators, tile, etc.)
- Glass, including bottles, tableware, window glass, wire glass, or multiple glass fragments
- Metal items, including equipment, vehicle parts, agricultural items, enameled ironware, etc.
- Bakelite, celluloid, glass, and shell buttons
- Punch-opened and solder-sealed beverage cans, solder-sealed food tins, general lack of thin-walled aluminum and welded steel cans
- Residential structural remains, such as historic building foundations or privies

NOTE: Items made of plastic, polystyrene, nylon, or Styrofoam, or those with modern markings (e.g., candy wrappers, or bottles and cans recognizable as modern) are not archaeological resources and do not constitute an inadvertent discovery.

Figure 1: Standard Inadvertent Discovery Process for Archaeological Resources on FTA Region 10 Projects



1 Consulting parties must be notified within 48 hours of an archaeological discovery
 2 Consulting parties have 48 hours to respond to agency determinations regarding discoveries
 3 Under Washington State Law, an excavation permit may be required prior to completion of this step

2.1 On-Site Staff Responsibilities

The following section describes the steps to follow if an on-site Sound Transit employee, contractor, or subcontractor believes that they have uncovered a potential archaeological resource (a find) at any point in the project.

- 1. Stop Work:** All work on site and in areas adjacent to the find will stop. The area of work stoppage will be adequate to protect the find from any further disturbance; this is expected to be 30 feet in any direction, unless site conditions indicate otherwise. The location of the find will be secured at all times. The find will not be handled, removed, reburied, or covered. The Contractor will install a physical barrier (e.g., exclusionary fencing) and prevent all machinery, other vehicles, and unauthorized individuals from crossing the barrier until the Project Archaeologist examines and verifies the find. Vehicles, equipment, and unauthorized personnel will not be permitted to traverse the discovery area. Spoils piles or vehicles (such as dump trucks) with the potential to contain archaeological resources will remain on site. Work at the location of the find will not resume until authorized by DAHP in coordination with ST.
- 2. Notify the Archaeological Monitor:** If there is an archaeological monitor on site, notify that person. The monitor will contact Alex Stevenson, Cultural Resources Program Manager, Sound Transit, unless there is a monitoring plan in place that directs the monitor to do otherwise. If Alex Stevenson is not available, the monitor will contact Hussein Rehmat, Environmental Planner, Sound Transit.
- 3. Notify Project Management:** If there is no archaeological monitor on site, contact Alex Stevenson. If they are not available, contact Hussein Rehmat. The Sound Transit representative will make all other contacts.
- 4. Avoid Any Other Communication:** Do not call 911, the media, or members of the public about the find.

IDP Terminology

A **find** is a discovery during construction that could potentially be an archaeological resource.

An **archaeological resource** is an artifact or feature (or group of artifacts or features) older than 50 years.

An **NRHP-eligible archaeological resource** is one that has been evaluated and meets the criteria for listing in the National Register of Historic Places. (NRHP).

2.2 Project Manager Responsibilities

- 1. Contact the Project Archaeologist:** Alex Stevenson of Sound Transit or designee will contact the Project Archaeologist, Ron Adams (or, if there is not one, designate a qualified archaeologist), to evaluate whether the find is an archaeological resource as defined by state or federal law. If the Project Archaeologist recommends that the find is not an archaeological resource, the Project Archaeologist can authorize work to continue.

2. **Determine Area Adequate for Protection:** If the Project Archaeologist recommends that the find is an archaeological resource, the Project Archaeologist will determine the area and the means adequate for protection and instruct the Contractor to maintain or adjust the protected area accordingly.
3. **Notify Consulting Parties:** The Project Archaeologist will notify DAHP in coordination with ST of the discovery of an archaeological resource. DAHP in coordination with ST shall notify consulting parties (SHPO, tribes, and any other identified interested parties) of the find within 48 hours, per 36 CFR Part 800.13.
4. **Research to evaluate NRHP-Eligibility:** The Project Archaeologist will conduct any additional research necessary to evaluate National Register of Historic Places (NRHP) eligibility of the archaeological resource. Based on this research, the Project Archaeologist will recommend to ST and DAHP whether the archaeological resource is NRHP-eligible. This additional research may include preparation of an archaeological excavation permit which will be prepared by ST and reviewed by DAHP in consultation with consulting parties. DAHP will authorize this permit and allow research to continue as appropriate.
5. **Formally Determine NRHP-Eligibility and Continue Consultation:** DAHP in coordination with ST shall determine whether the archaeological resource is NRHP-eligible and shall provide the determination to consulting parties. Consulting parties shall respond within 48 hours, per 36 CFR Part 800.13.

If DAHP in coordination with ST determines that the archaeological resource is not NRHP-eligible and consulting parties do not object within 48 hours, construction may continue when authorized by DAHP in coordination with ST. If any consulting party objects, DAHP in coordination with ST shall continue consultation with all consulting parties in good faith to resolve the lack of agreement.

6. **Avoid or Mitigate Adverse Effects:** If DAHP in coordination with ST determines that the archaeological resource is NRHP-eligible, DAHP will work with ST to determine whether adverse effects can be avoided. If adverse effects can be avoided, DAHP in coordination with ST shall provide documentation of avoidance and a determination of No Adverse Effect to consulting parties. If consulting parties do not object within 48 hours, construction may continue when authorized by DAHP in coordination with ST. If any consulting party objects, DAHP in coordination with ST shall continue consultation with all consulting parties in good faith to resolve the lack of agreement.

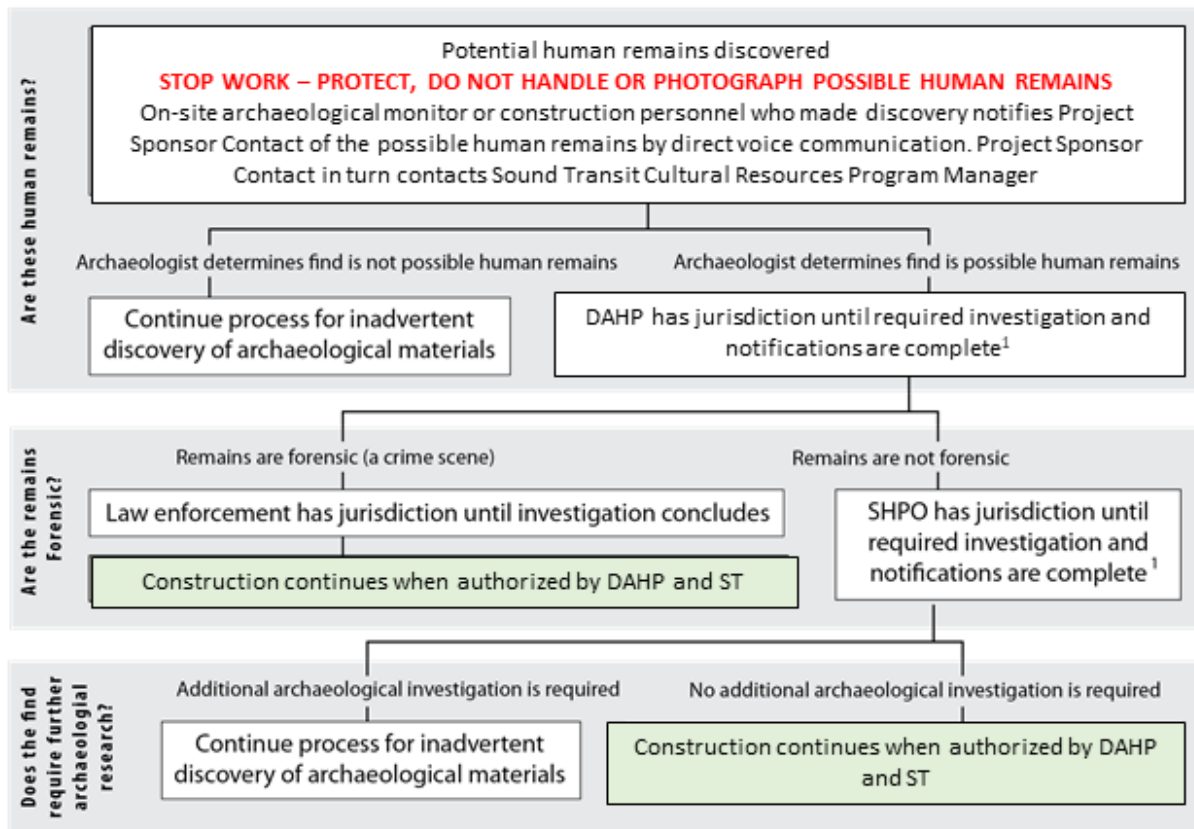
If DAHP in coordination with ST determines that adverse effects cannot be avoided, DAHP will work with ST and consulting parties to implement mitigation measures outlined in an

excavation permit. This permit may be the same as the initial excavation permit from Step 5 or preparation of an additional excavation permit may be required.

3 Human Remains

Uncovered human remains on project construction site require special treatment under RCW 68.50.645. Any potential remains that are encountered during project work should be assumed to be human until determined otherwise by the Project Archaeologist or the applicable County Medical Examiner. Procedures for the discovery of possible human remains are shown in Figure 2 and described below.

Figure 2: Process for Discovery of Possible Human Remains



¹ Notification requirements depend, in part, on whether the remains are Native American.

3.1 On-Site Staff Responsibilities

On-site staff will follow the procedures described below. The contact phone tree is shown in Appendix A - On-Site Inadvertent Discovery Guide.

1. **Stop Work:** If any Sound Transit employee, contractor, or subcontractor believes that he or she has uncovered possible human remains at any point in the project, all work on site and in areas adjacent to the discovery will stop. The area of work stoppage will be adequate to

protect the discovery, which is expected to be a minimum of 30 feet in all directions, unless the Project Archaeologist or law enforcement personnel indicate otherwise.

2. **Do Not Handle Human Remains:** Possible human remains shall not be handled, removed, reburied, or covered.
3. **Flag and Secure the Area:** The area of discovery will be flagged and secured. The location of the discovery will be secured at all times. Construction equipment and personnel will not enter the area. Spoils piles or vehicles from the area that have the potential to contain human remains, such as dump trucks, will remain on site. No persons other than the proper law enforcement personnel, the applicable County Medical Examiner, and professional archaeologists will be authorized to access the discovery location after the area is secured.
4. **Notify the Archaeological Monitor:** If there is an archaeological monitor on site, notify that person. The monitor will contact Alex Stevenson, Cultural Resources Program Manager, Sound Transit, unless there is a monitoring plan in place that directs the monitor to do otherwise. If Alex Stevenson is not available, the monitor will contact Hussein Rehmat, Environmental Planner, Sound Transit.
5. **Notify Project Management:** If there is no archaeological monitor on site, contact Alex Stevenson. If they are not available, contact Hussein Rehmat. The Sound Transit representative will make all other contacts.
6. **Avoid Any Other Communication:** Do not call 911, the media, or members of the public about the find.

3.2 Project Manager Responsibilities

1. **Preliminary Observation:** The Sound Transit Cultural Resources Program Manager of Sound Transit will notify DAHP (via phone) of the discovery, and will coordinate with the Project Archaeologist to assess whether the discovery may be human remains (without disturbing the discovery further). If the discovery can be definitively identified as nonhuman, procedures for archaeological resources will be followed.
2. **Notify Local Law Enforcement:** If the discovery could possibly be human remains, Sound Transit Cultural Resources Program Manager or the Project Archaeologist shall call the Federal Way Police Department nonemergency number and report that potential human remains have been discovered. The Federal Way Police Department will control the discovery site until it is either determined to be non-forensic (not a crime scene) or the investigation is complete.
3. **Participate in Consultation:** FTA and the Sound Transit Cultural Resources Program Manager will participate in consultation. If there are also archaeological materials at the

human remains discovery location, there may be a parallel archaeological resources process led by DAHP. Construction can resume when authorized by DAHP and ST.

4 Construction Team Training, Communication, and Reporting

4.1 Preconstruction Meeting

A preconstruction meeting will be held for the Project Archaeologist, Construction Management Lead, Resident Engineer, Contractor's project manager, Project Superintendent, and other personnel responsible for overseeing ground-disturbing field operations to:

- Review IDP procedures
- Provide introductions of the Sound Transit representatives, the Project Archaeologist, and other personnel
- Describe the role of the Project Archaeologist
- Establish a chain of command for communication and decision-making among the Project Archaeologist and Sound Transit and Contractor personnel
- Clarify questions about stop-work and notification procedures
- Provide a copy of the On-Site Inadvertent Discovery Guide (Appendix A) to field staff providing oversight of ground-disturbing work.

The preconstruction meeting will occur prior to any ground-disturbing activity. Additional meetings will be scheduled if there is substantial staff turnover, concern about staff understanding the protocols, a long break in construction, or a desire for refresher training on policy. The Project Archaeologist will remain in contact with Sound Transit Cultural Resources Program Manager and Sound Transit throughout the project to determine if site visits, additional meetings, or orientations are needed.

4.2 Construction Crew Member Orientation

The Project Archaeologist may provide on-site cultural resources orientation for all construction crew members leading ground-disturbing construction work. Orientation will inform and familiarize construction personnel with the IDP protocols and their responsibility to call attention to any archaeological materials they observe. The Sound Transit Cultural Resources Program Manager will coordinate with the Project Archaeologist to provide a brief orientation to construction crew members, as appropriate.

4.3 Ongoing Communication

The Sound Transit staff, contractor, and its agents will abide by established communication protocols described in the inadvertent discovery processes in Sections 2 and 3 regarding any archaeological resource matters that arise during construction. The Project Archaeologist will remain in communication with the Sound Transit Cultural Resources Program Manager (or designee), as appropriate, throughout project construction, via email and phone. If any member of the Project team feels communication is inadequate to ensure that the archaeologist is on site when it is prudent, the Project team member can contact DAHP. DAHP will coordinate with Sound Transit on how to improve communication.

4.4 Reporting of Inadvertent Discoveries

The responsibilities of the Project team include assessments of any inadvertent discoveries and a summary of results at the conclusion of construction. Reports regarding assessments of any inadvertent discoveries will be provided by Sound Transit to DAHP for review before submission to consulting parties. For all reporting, sensitive information regarding archaeological resources, human remains, funerary objects, or traditional practices shall not be released except as authorized by DAHP under applicable state.

Assessment of Inadvertent Discoveries

The Project Archaeologist will be responsible for preparing an assessment of all inadvertent discoveries during construction. The assessment will be used by DAHP to determine Section 106 eligibility and effects determinations and inform any additional coordination or investigation that may be necessary. The assessment will be prepared within 24 hours of an inadvertent discovery and can be provided to FTA in a memorandum or email. It will include the following information:

- 1) A description of the find, in enough detail to characterize its features and age. The description should include at least one photograph of the find.
- 2) A description and map of where the find occurred, including its context with adjacent features. The location of the find should be identified on a map that also identifies other known historic properties, if relevant.
- 3) Whether or not the find is an archaeological resource.
- 4) For archaeological resources, a recommendation of NRHP-eligibility that includes a statement of the age of the find, evaluation of find against each NRHP criterion, and a description of the integrity of the find.

5 Archaeological Resources and Collection Curation

No artifact shall be removed or taken by any construction crew member, regardless of archaeological significance or the disposition of the artifact. If a NRHP-eligible resource is encountered and the Archaeological Treatment Plan includes excavation or removal of the archaeological materials, the plan will specify collection and curation requirements. If artifacts are removed from the site for analysis and determined ineligible, the Project Archaeologist will dispose of the material.

6 Contact Information

<p>Sound Transit Primary Contact: Alex E. Stevenson Title: Cultural Resources Program Manager Office Phone: 206-553-3655 Cell Phone: 206-419-5315 Email address: alex.stevenson@soundtransit.org</p> <p>Alternate Contact: Hussein Rehmat Title: Environmental Planner Office Phone: 206-689-4828 Cell Phone: 425-591-2472 Email address: hussein.rehmat@soundtransit.org</p>	<p>Federal Way Police Department Non-Emergency Number: 253-835-2121</p> <p>Puyallup Tribe of Indians Primary Contact: Brandon Reynon Title: Tribal Historic Preservation Officer Office Phone: 253-573-7986 Email address: brandon.reynon@puyalluptribe-nsn.gov</p> <p>Nisqually Indian Tribe Primary Contact: Brad Beach Title: Tribal Historic Preservation Officer Office Phone: 360-456-5221, ext. 1277 Cell Phone: 360-528-0680 Email address: beach.brad@nisqually-nsn.gov</p>
<p>Project Archaeologist Ron Adams, Archaeologist, Historical Research Associates, Inc. Office Phone: 206-343-0226, ext. 329 Cell Phone: 503-860-1693 Email address: ron.l.adams73@gmail.com</p>	<p>Confederated Tribes and Bands of the Yakama Nation Primary Contact: Kate Valdez Title: Tribal Historic Preservation Officer Office Phone: 509-865-1068 Email address: kate@yakama.com</p>
<p>Washington State Department of Archaeology and Historic Preservation Transportation Archaeologist Name: Dennis Wardlaw Office Phone: 360-485-5014 Email address: dennis.wardlaw@dahp.wa.gov</p>	<p>Muckleshoot Indian Tribe Primary Contact: Laura Murphy Title: Archaeologist, Cultural Resources Office Phone: 253-876-3272 Email address: laura.murphy@muckleshoot.nsn.us</p>

Appendix A: On-Site Inadvertent Discovery Guide

Project Construction Managers are encouraged to make copies of this information and provide it to members of the construction team.

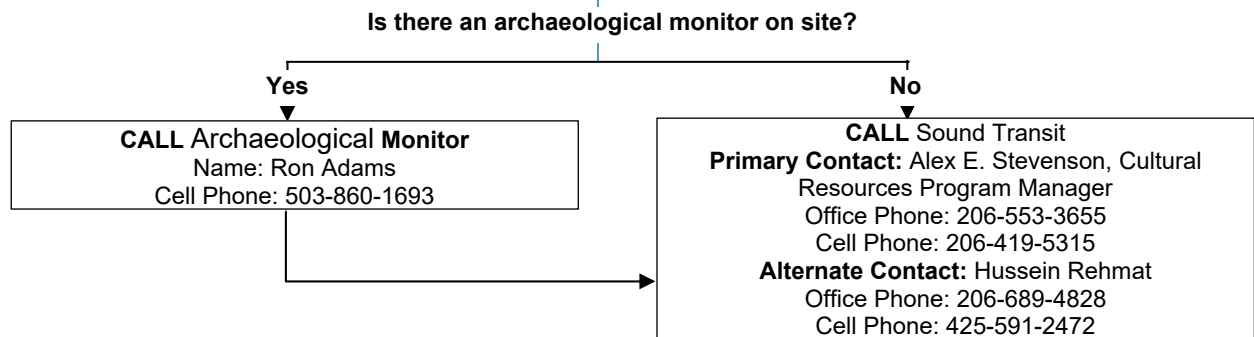
PROJECT NAME

On-Site Inadvertent Discovery Protocols for Archaeological Materials and Human Remains

This information assists on-site personnel in implementing procedures described in the Inadvertent Discovery Plan, in compliance with applicable state and federal laws.

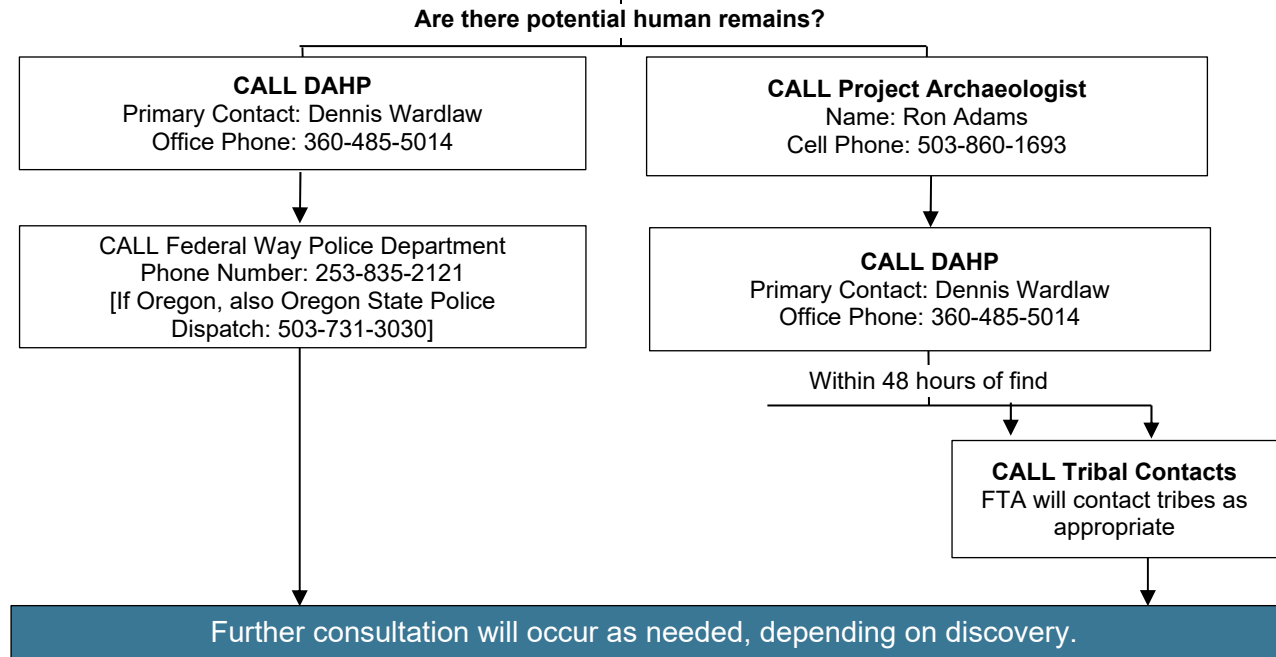
Contact Phone Tree—Potential archaeological resources encountered

On-site personnel stop all work within 30 feet of the discovery, unless conditions indicate otherwise. Work stoppage area will be adequate to protect the discovery.



STOP. On-site personnel do not make any further contacts.

Alex Stevenson, Cultural Resources Program Manager, makes all remaining contacts, in the order shown below.



Examples of Archaeological Resources

The Project Archaeologist can change photos to provide examples that are more representative of the project, as needed.



Layers of Shell



Burnt Soil (Hearth)



Burnt Rock Feature (Hearth)



Bone



Basketry



Flaked Stone Tool



Flaked Stone Tool



Stone Tool-Making Debris



Historic Cellar



Historic Utility Feature



Historic Artifact Scatter



Historic Artifacts