



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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Herman Dillon Sr.
Council Chairman
Puyallup Tribe of Indians
3009 E Portland Ave
Tacoma, WA 98404

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Herman Dillon Sr.:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives to be evaluated in the Draft EIS are described below.

- **SR 99 Alternative:** The SR 99 alternative would consist of light rail guideway along the SR 99 median except for transitioning to the west side or east side of the roadway to access the three baseline stations at South Kent-Des Moines Road, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal Way Transit Center stations will be evaluated. The SR 99 alternative also includes additional station locations in the vicinities of South 216th Street and South 260th Street. An alignment option along the west side of SR 99 in Federal Way will also be evaluated.
- **I-5 Alternative:** The I-5 alternative consists of light rail guideway along the south side of the proposed SR 509 right-of-way (ROW) directly to I-5, then proceeding along the west side of the I-5 ROW. The guideway deviates west from the I-5 ROW near 317th Street to access the Federal Way Transit Center area. There would be three baseline stations at Kent-Des Moines, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal

Way Transit Center stations will be evaluated. Additionally an alignment option that transitions to the I-5 median to avoid the Midway Landfill is to be evaluated.

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- I-5/SR 99 Alternative: The I-5 to SR 99 alternative would be the same as the I-5 alternative to approximately Kent-Des Moines Road, where it would transition to the SR 99 corridor, with the Kent-Des Moines Station located near 30th Avenue South, directly South of South 240th Street; this alternative would be the same as the SR 99 alternative.

Area of Potential Effect

The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

We look forward to your comments on the APE and the archaeological survey plan. So that we may move forward with the archaeological investigations, we respectfully request that you provide any comments within 30 days.

If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Brandon Reynon, Puyallup Tribe of Indians
Matthew Sterner, DAHP
Kent Hale, Sound Transit

March 2013

FEDERAL WAY LINK EXTENSION

Research Design for Archaeological Fieldwork Draft 1



CENTRAL PUGET SOUND
REGIONAL TRANSIT AUTHORITY

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

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1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N, Range 4 E
Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

4.0 Preliminary Information

The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

5.0 Field Methodology

The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

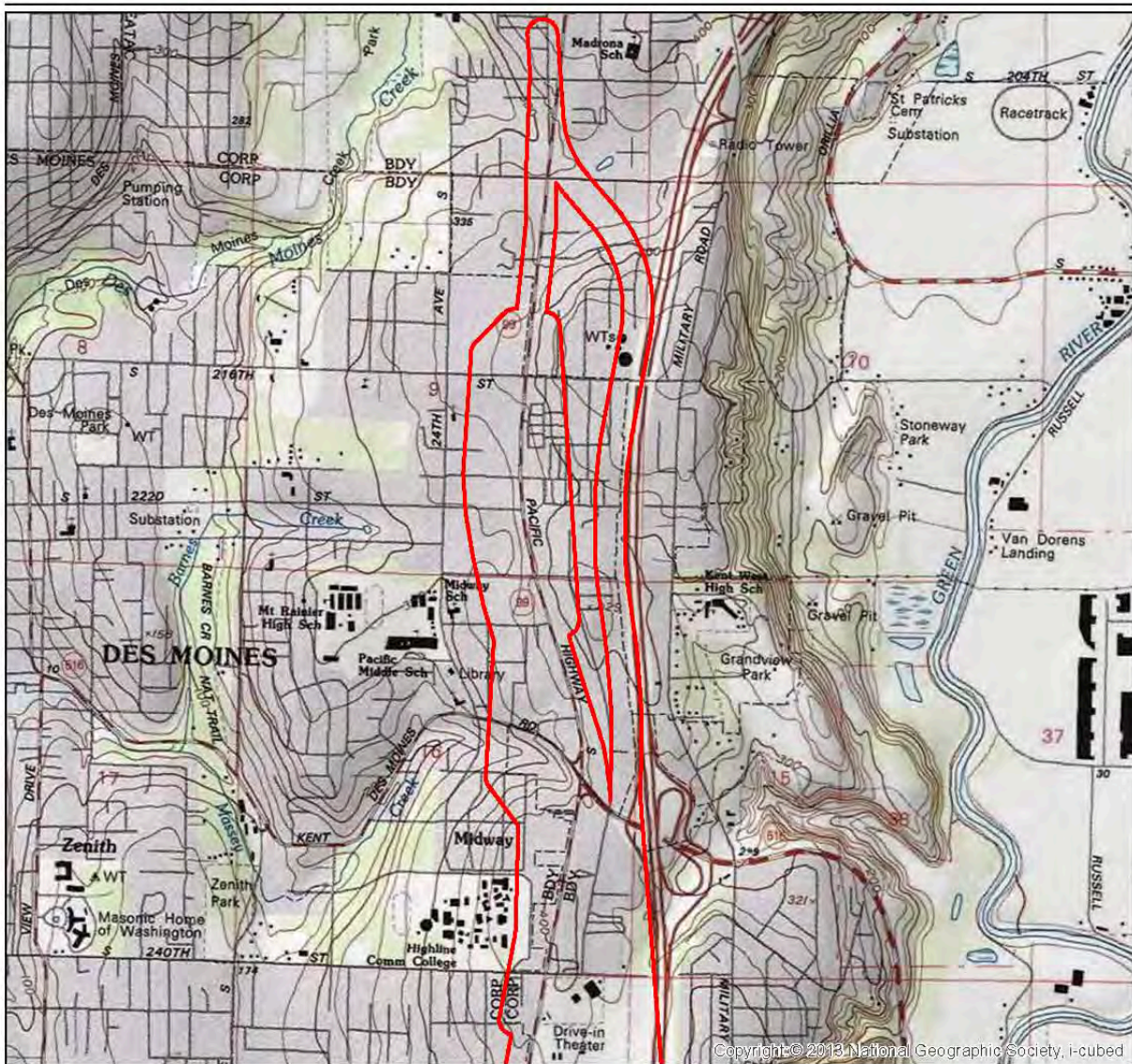
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

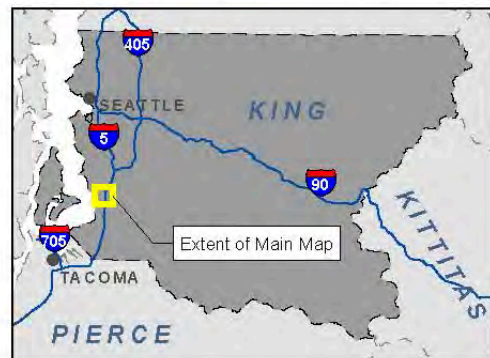
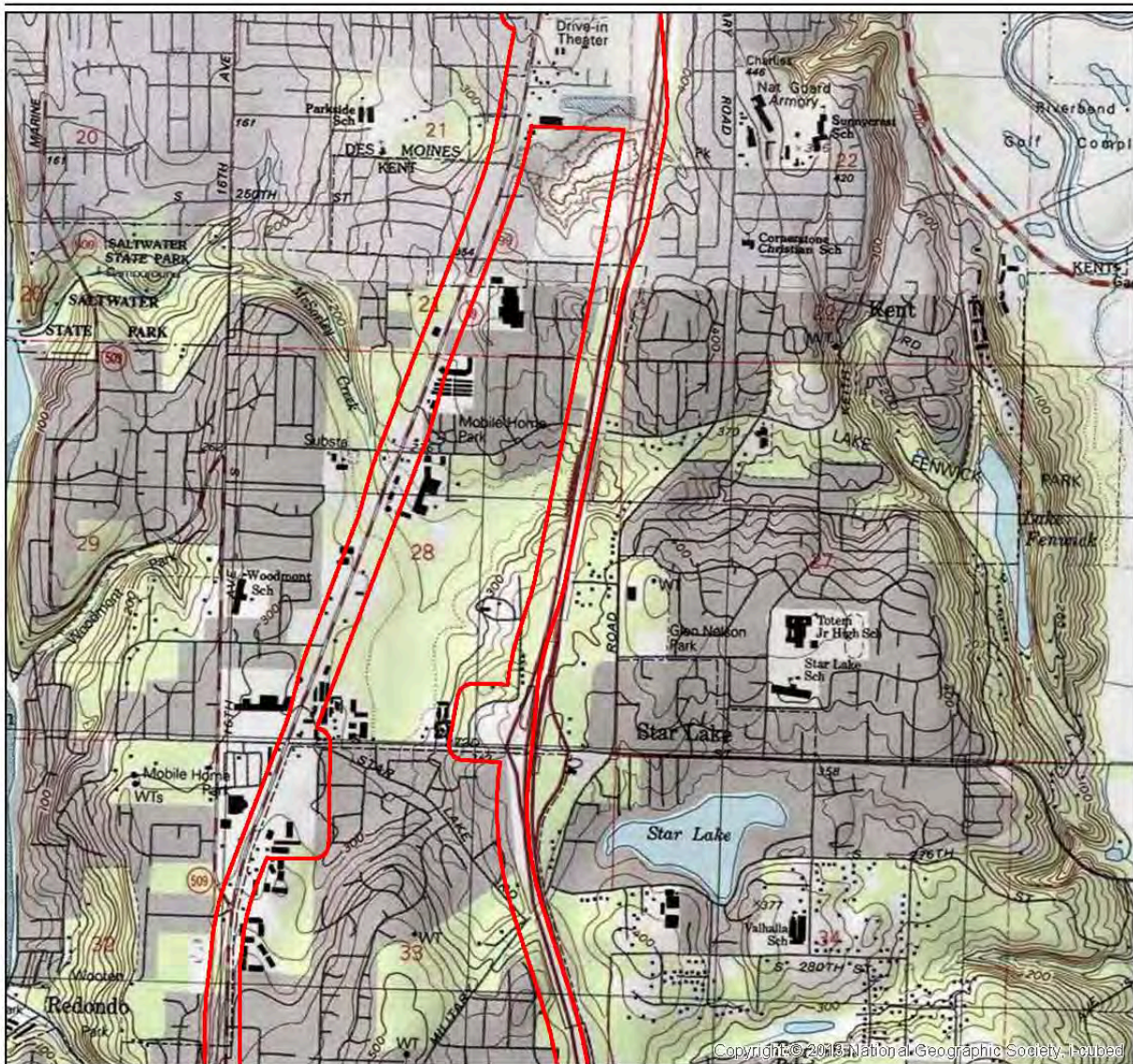


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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 Township 21 N Range 4 E
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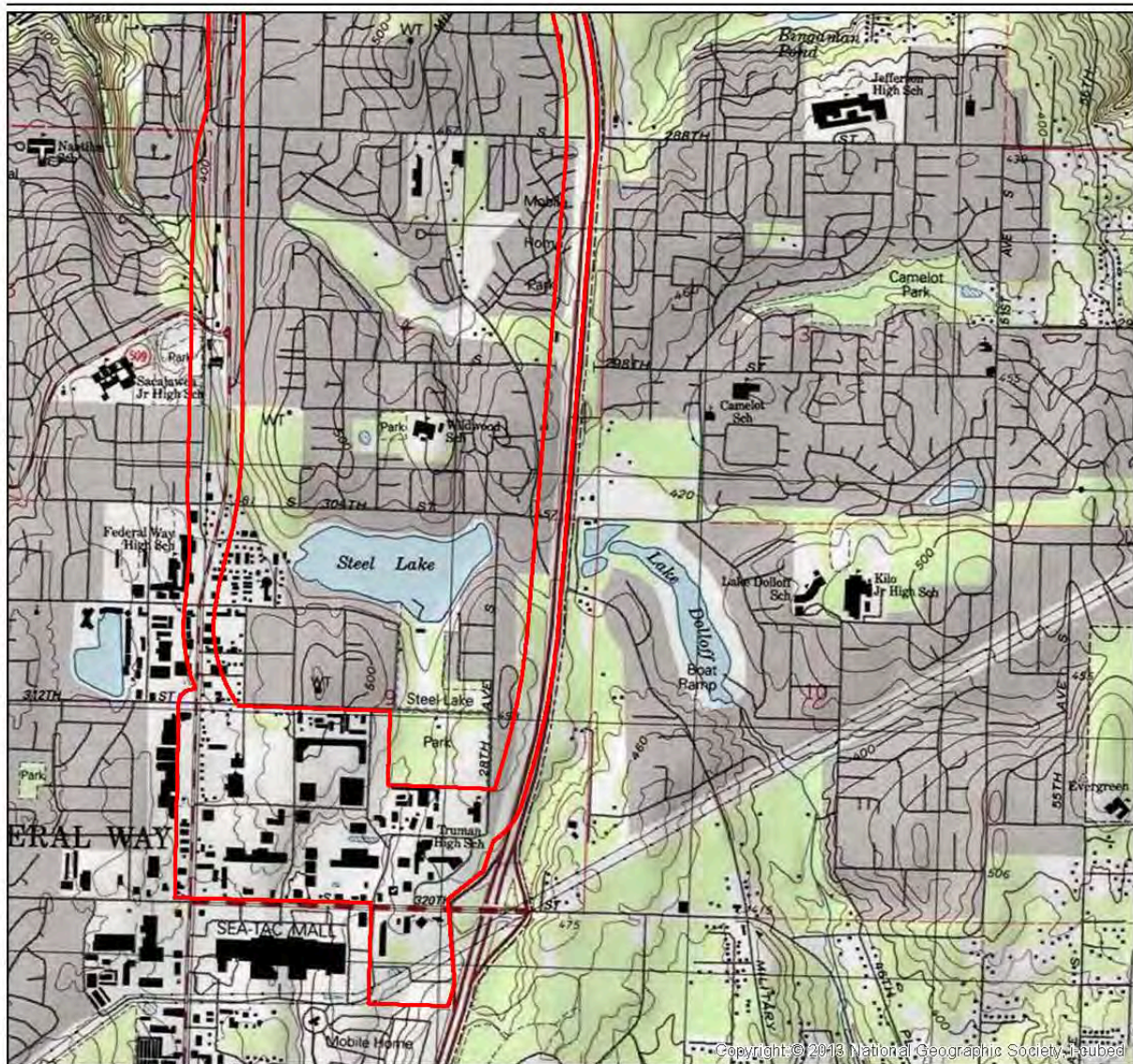


0 0.25 0.5 0.75 1 mi



FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
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Legend

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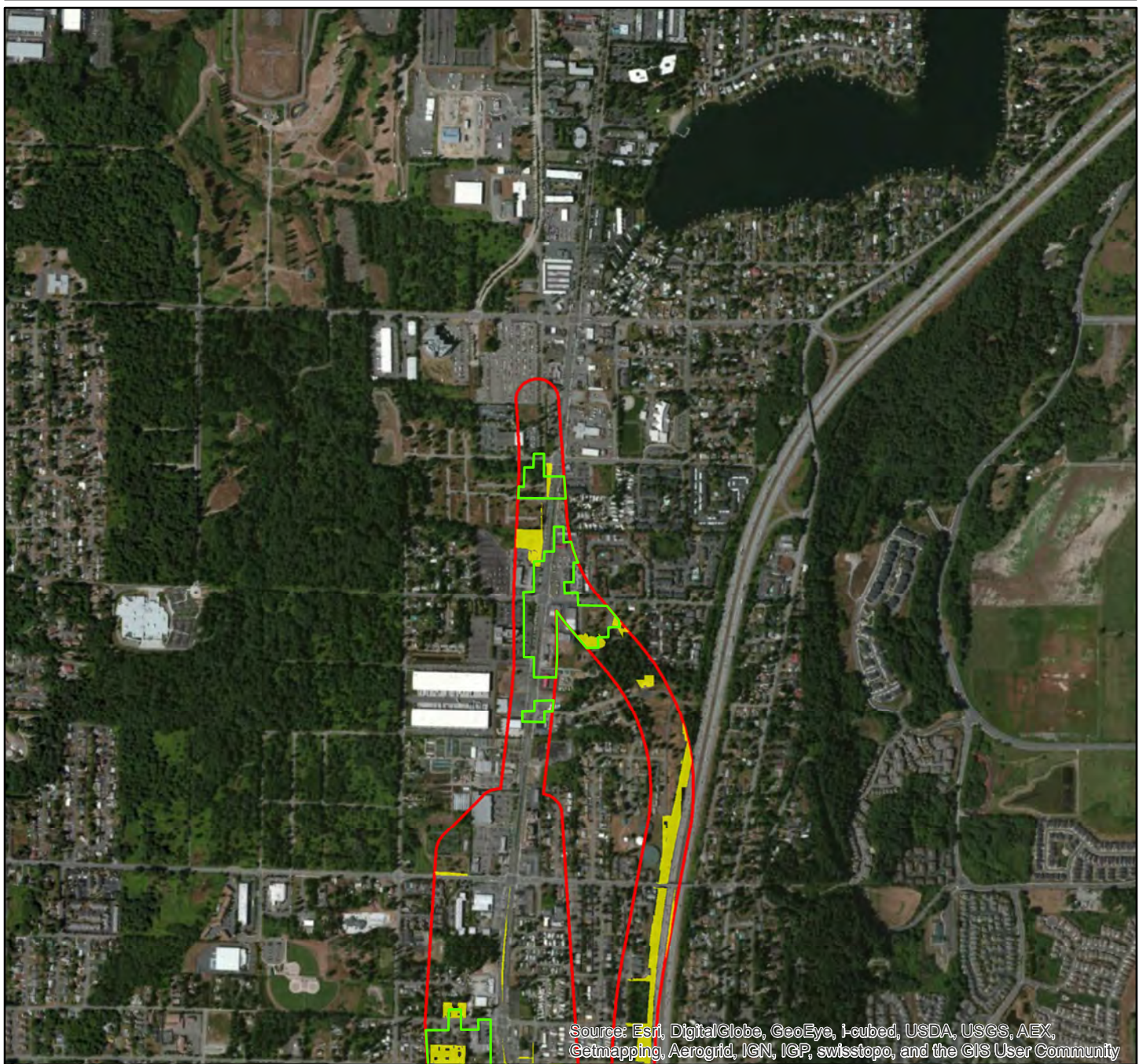


0 0.25 0.5 0.75 1 mi



FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
 Impervious/Impacted Surface Interpretation. King County GIS Center. 2009.

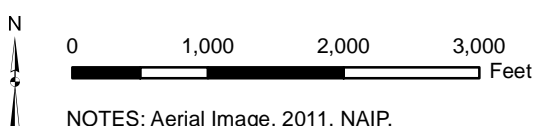
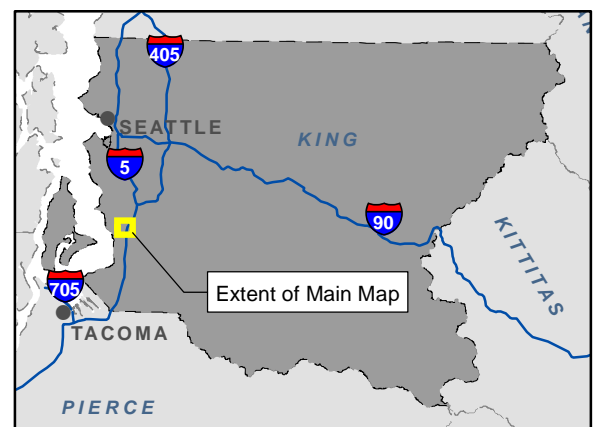
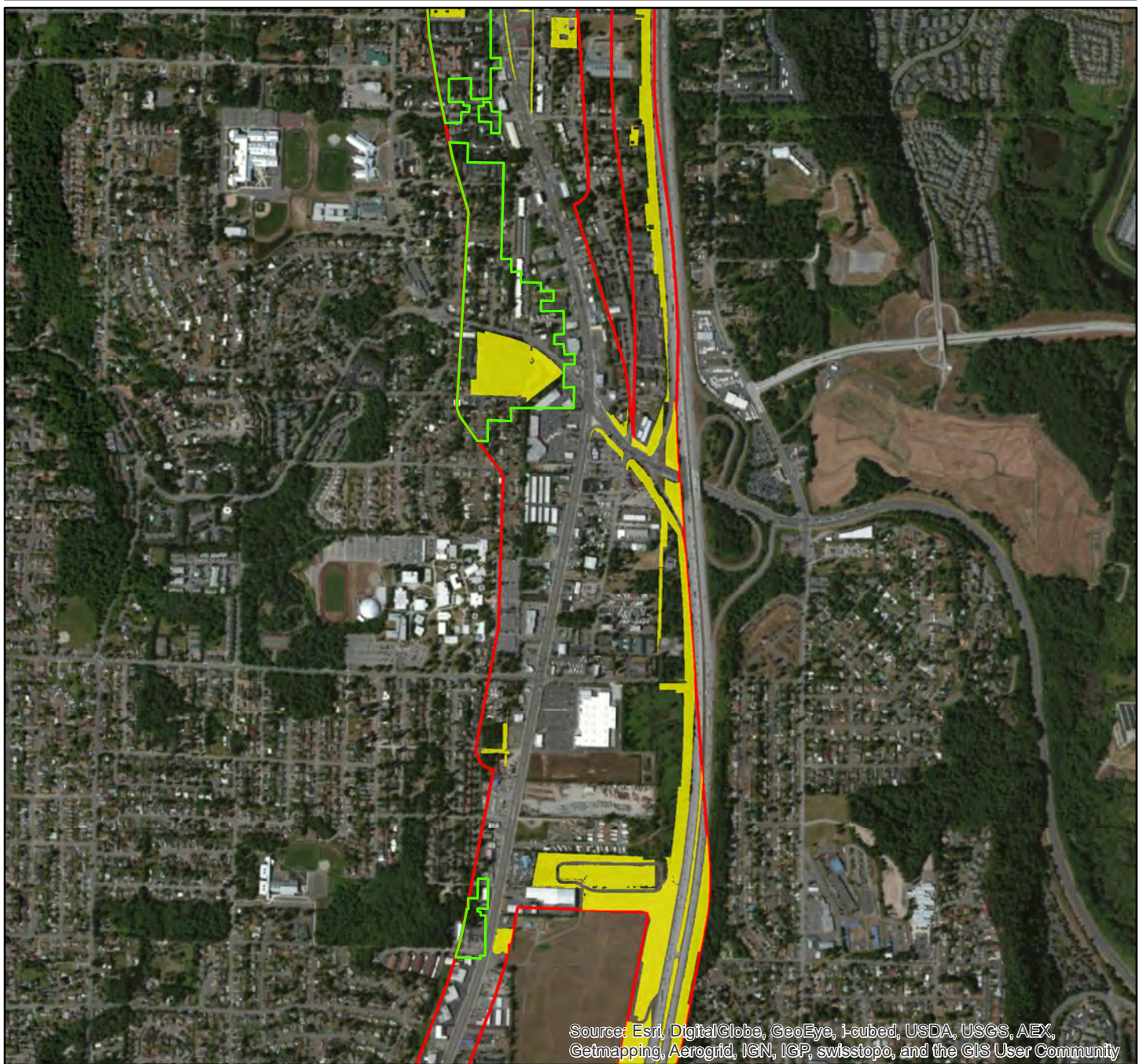


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
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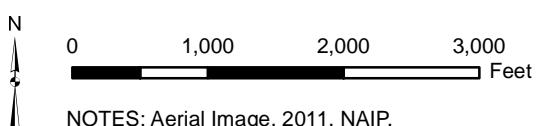
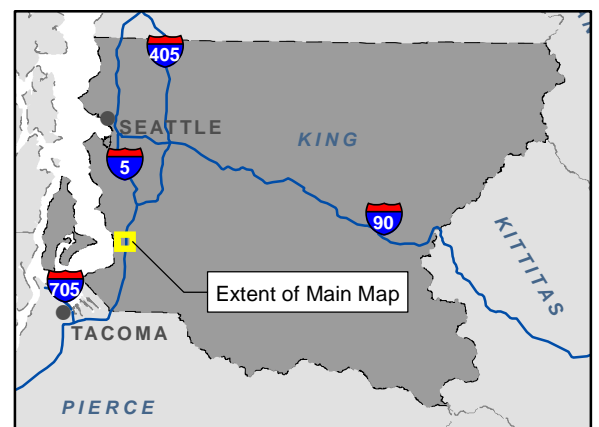
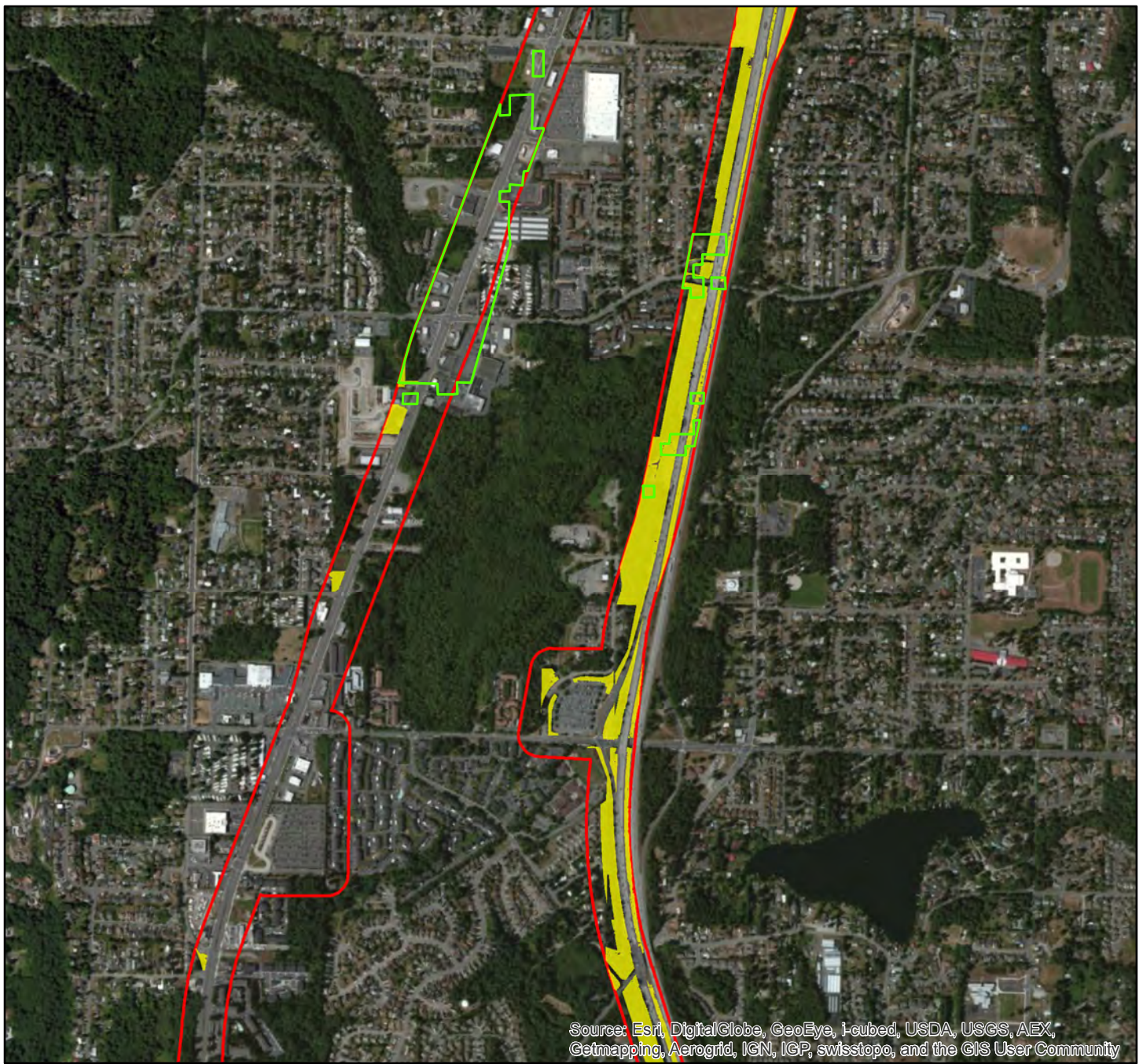


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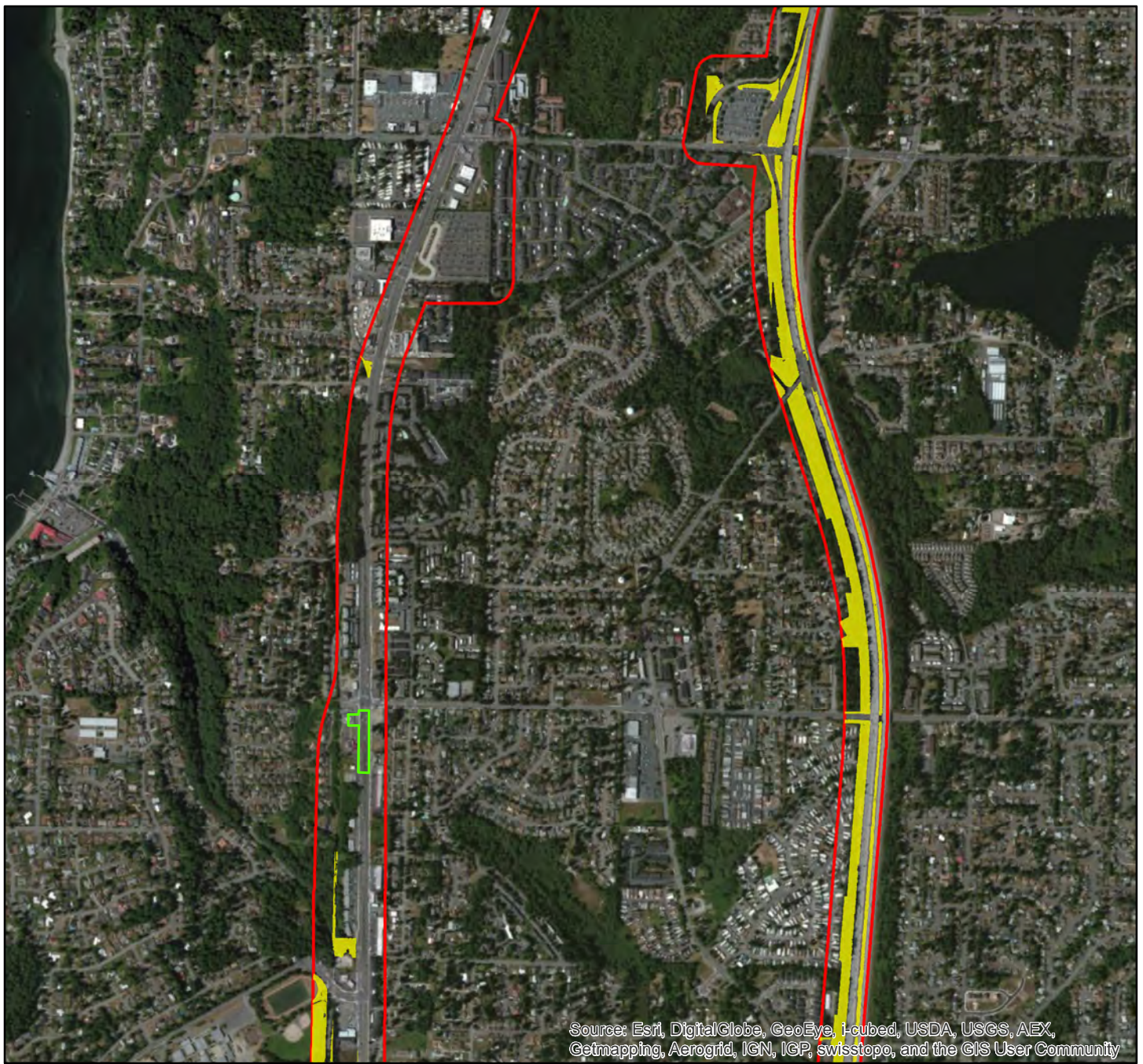
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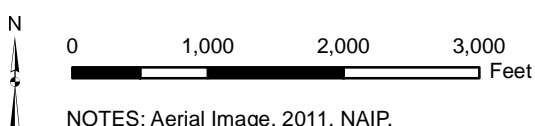
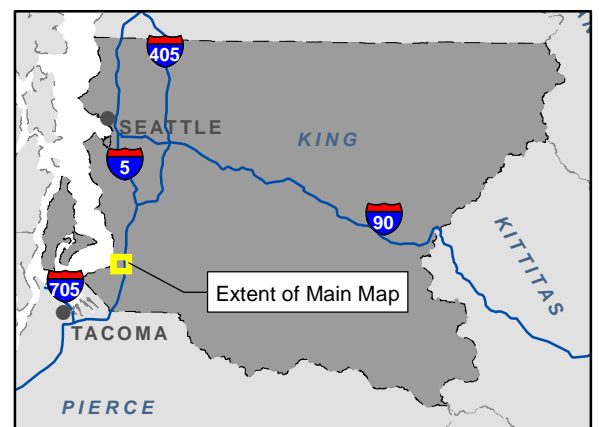


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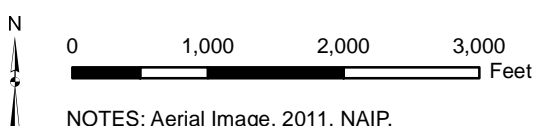
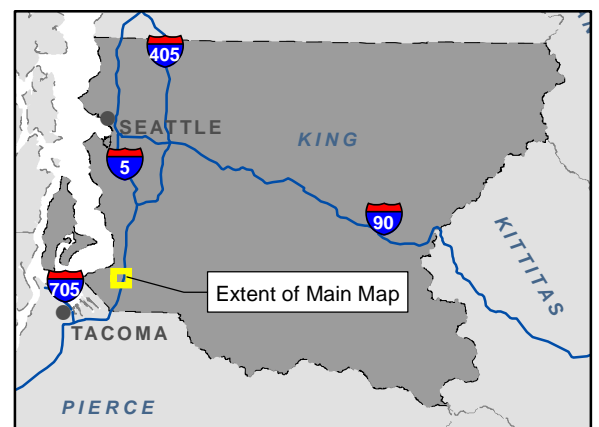


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April 2, 2014

Leonard Forsman
Tribal Chair
Suquamish Tribe
PO Box 498
Suquamish, WA 98392-0498

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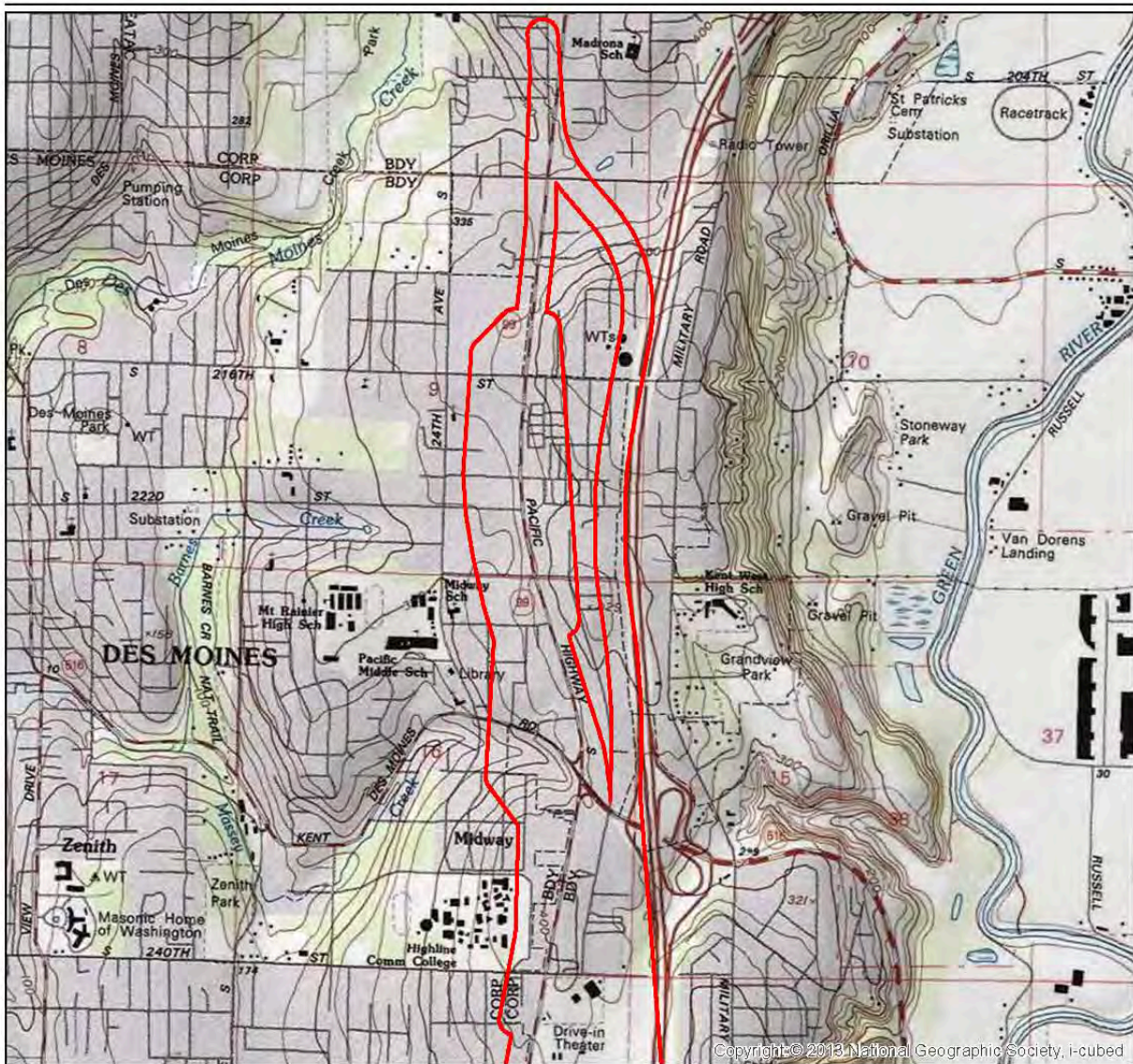
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

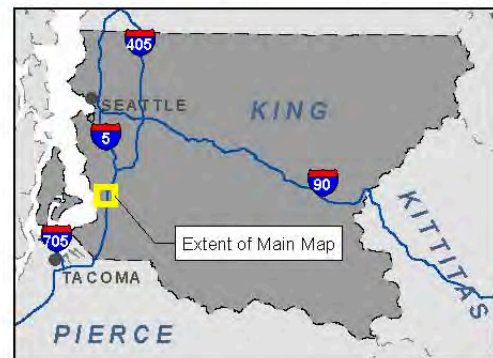
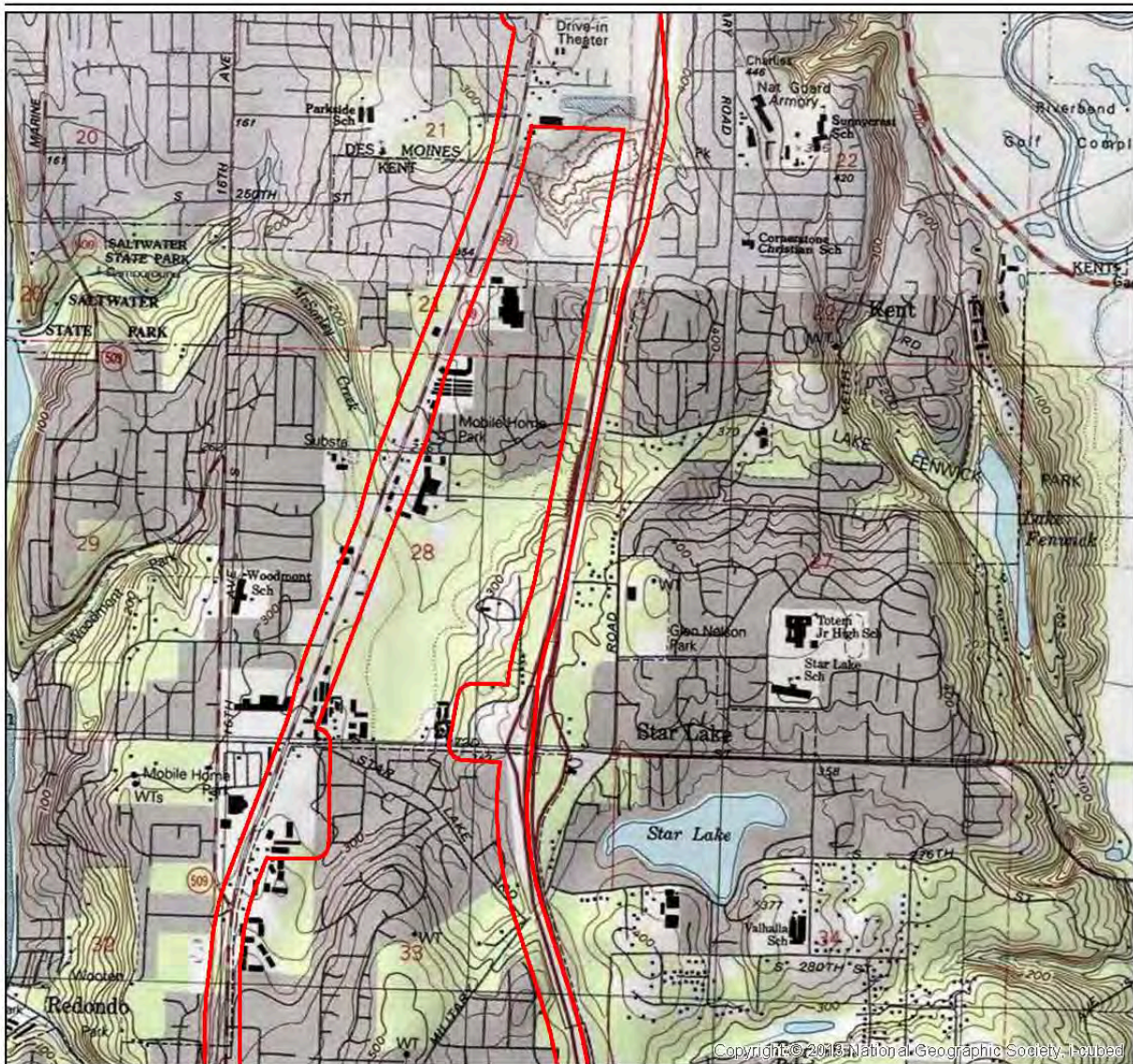


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
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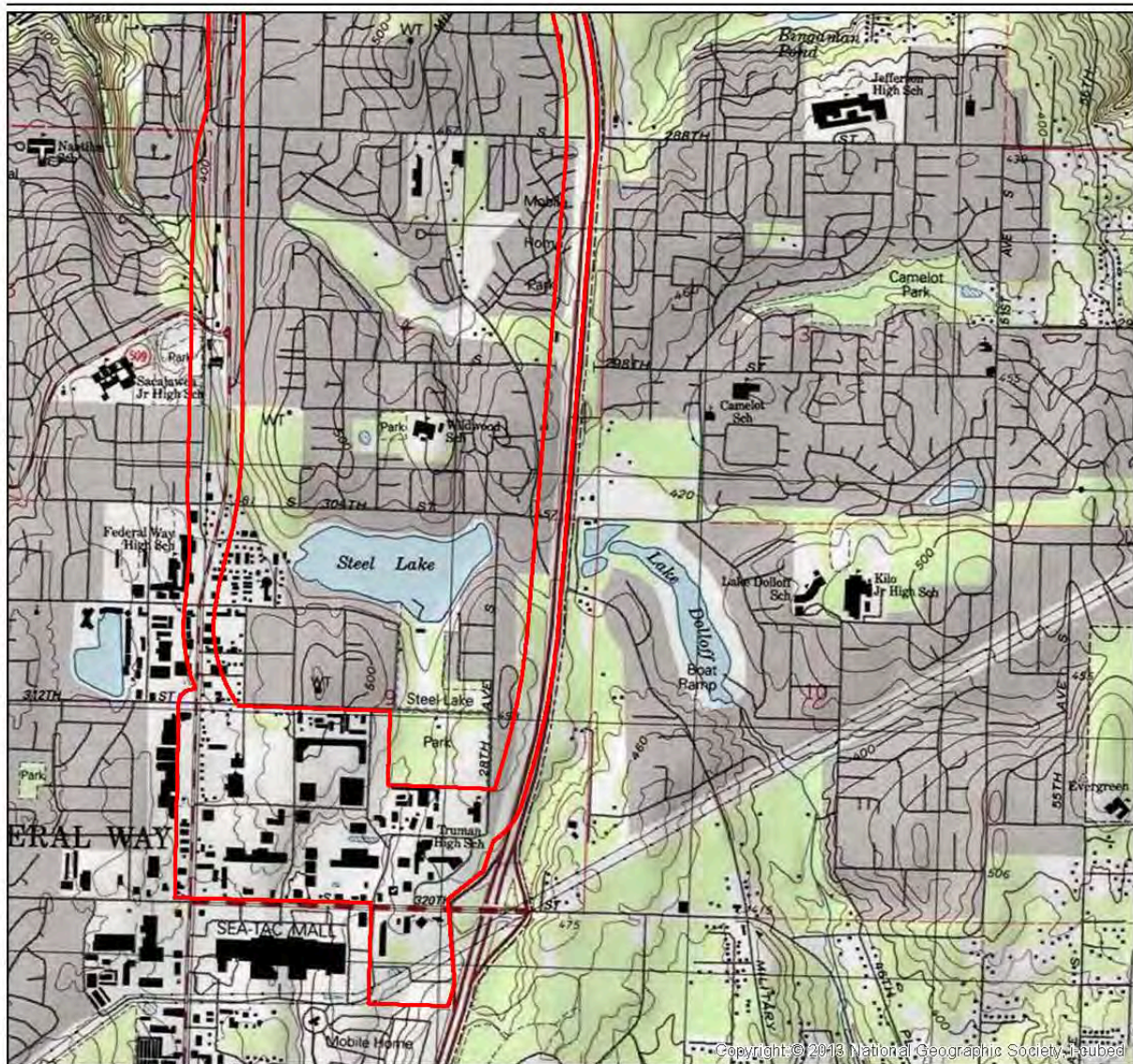


0 0.25 0.5 0.75 1 mi



FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

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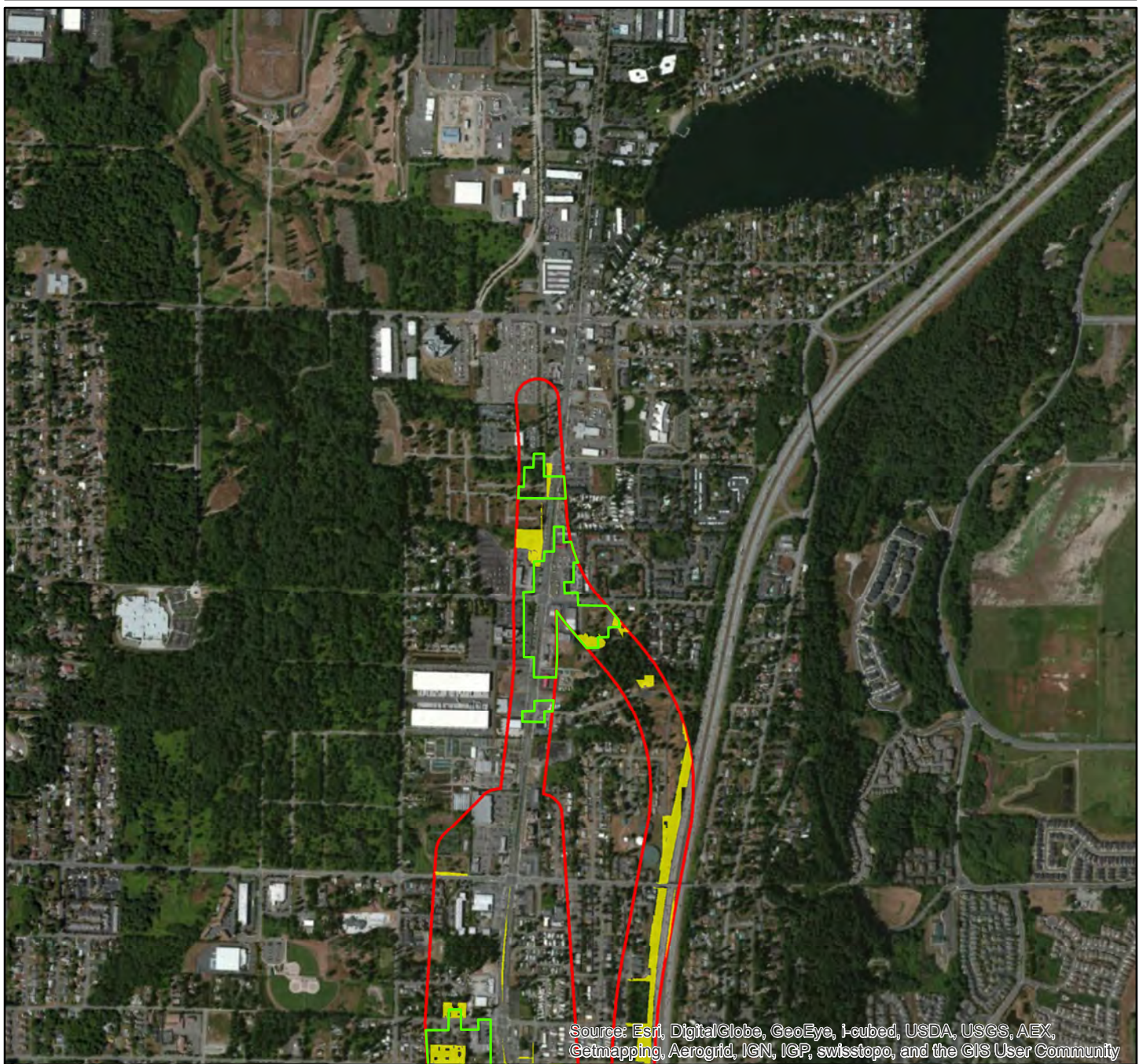


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
 Impervious/Impacted Surface Interpretation. King County GIS Center. 2009.

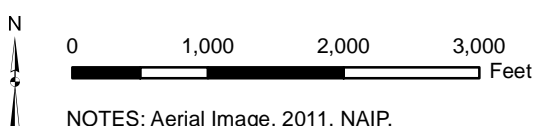
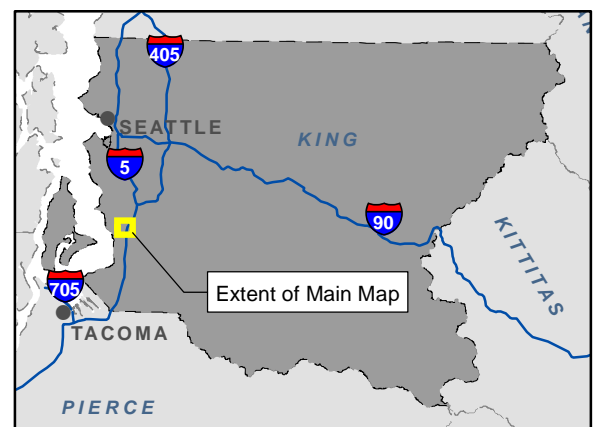
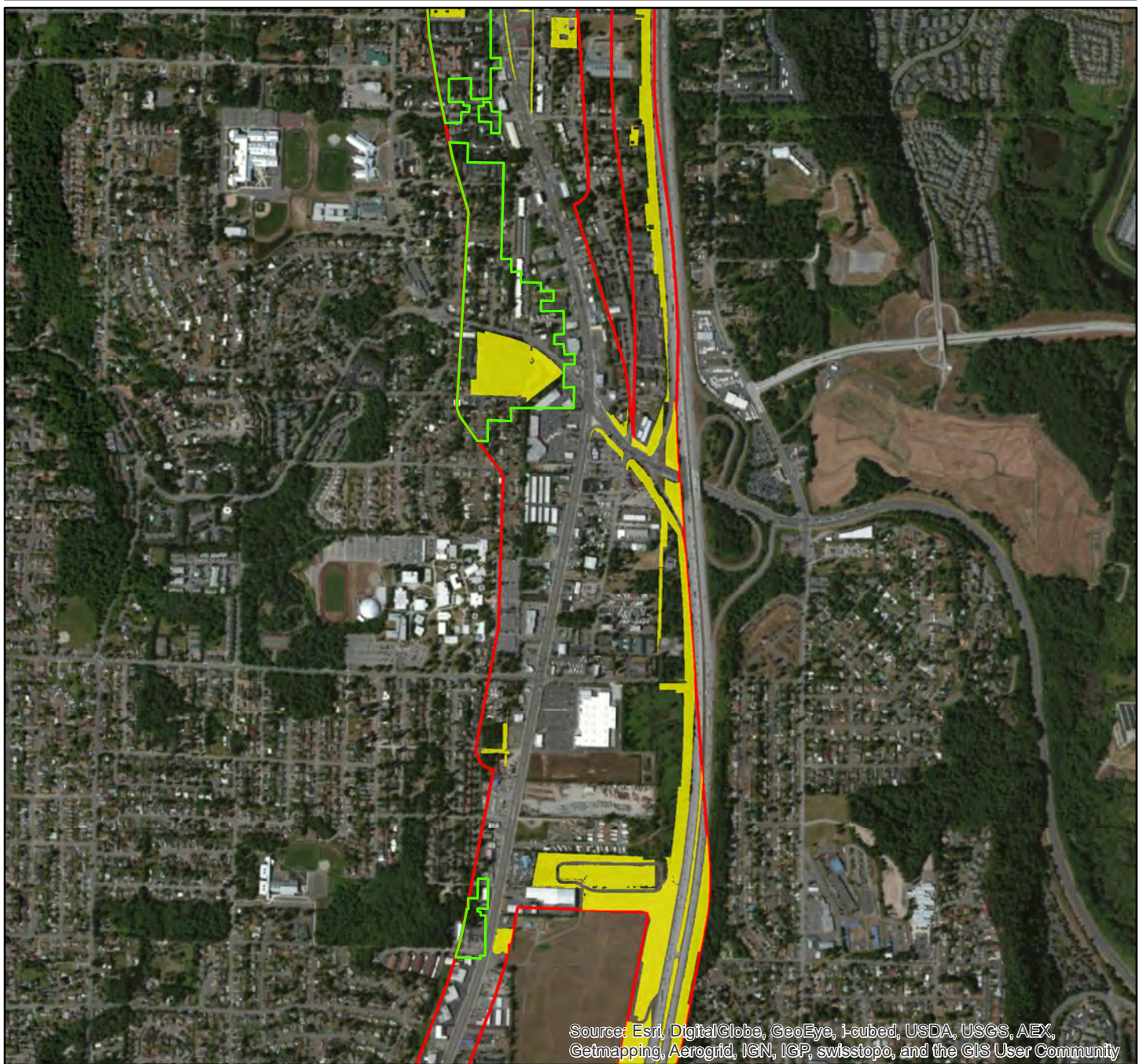


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:

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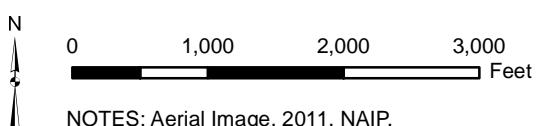
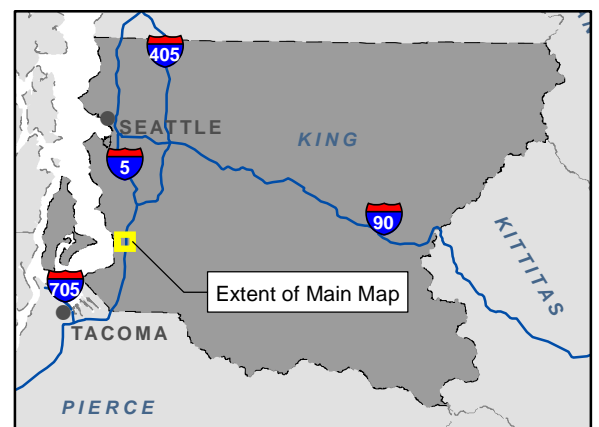
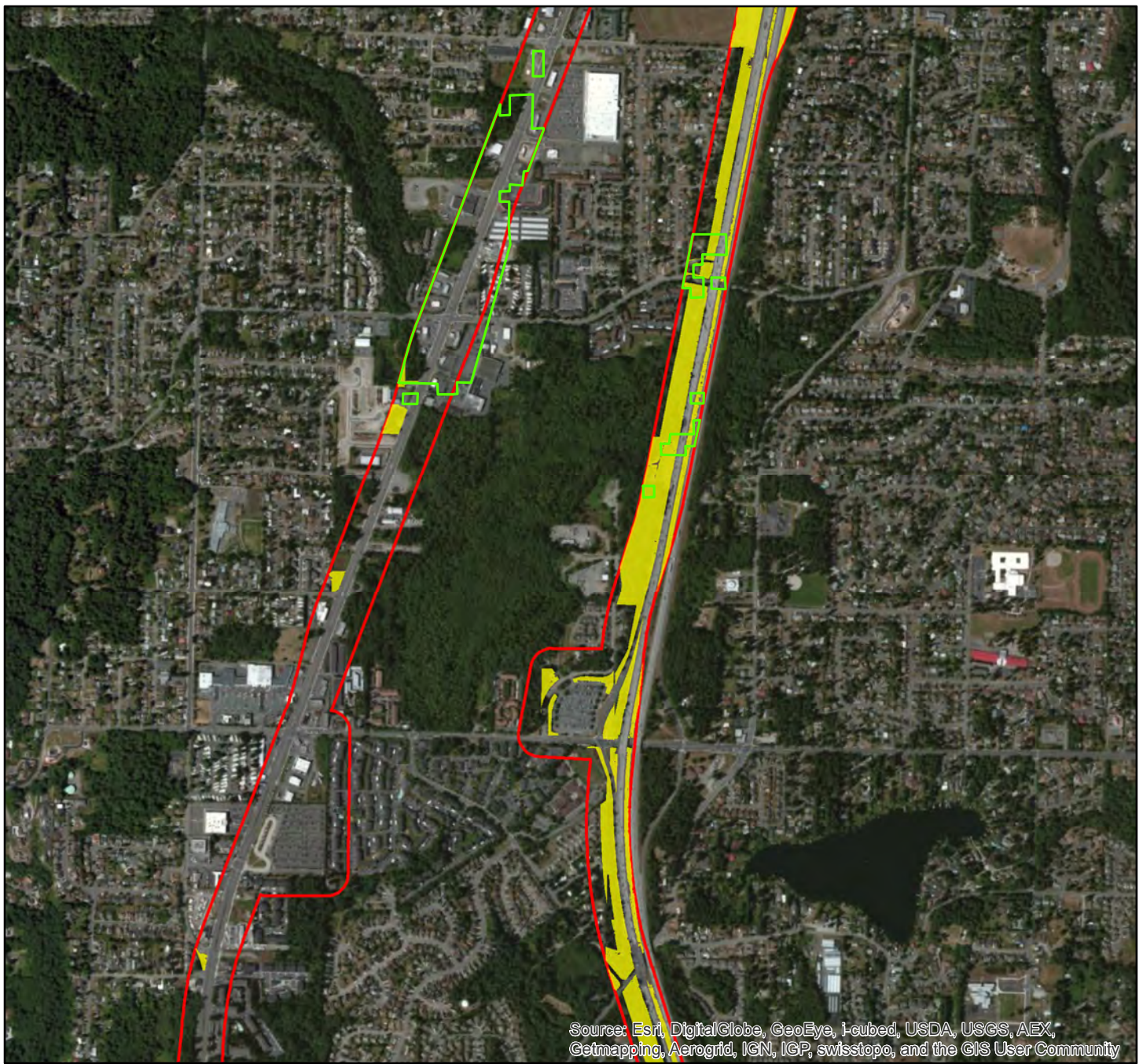


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



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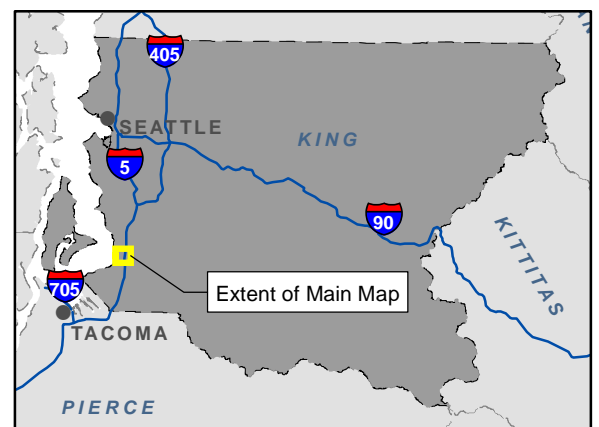
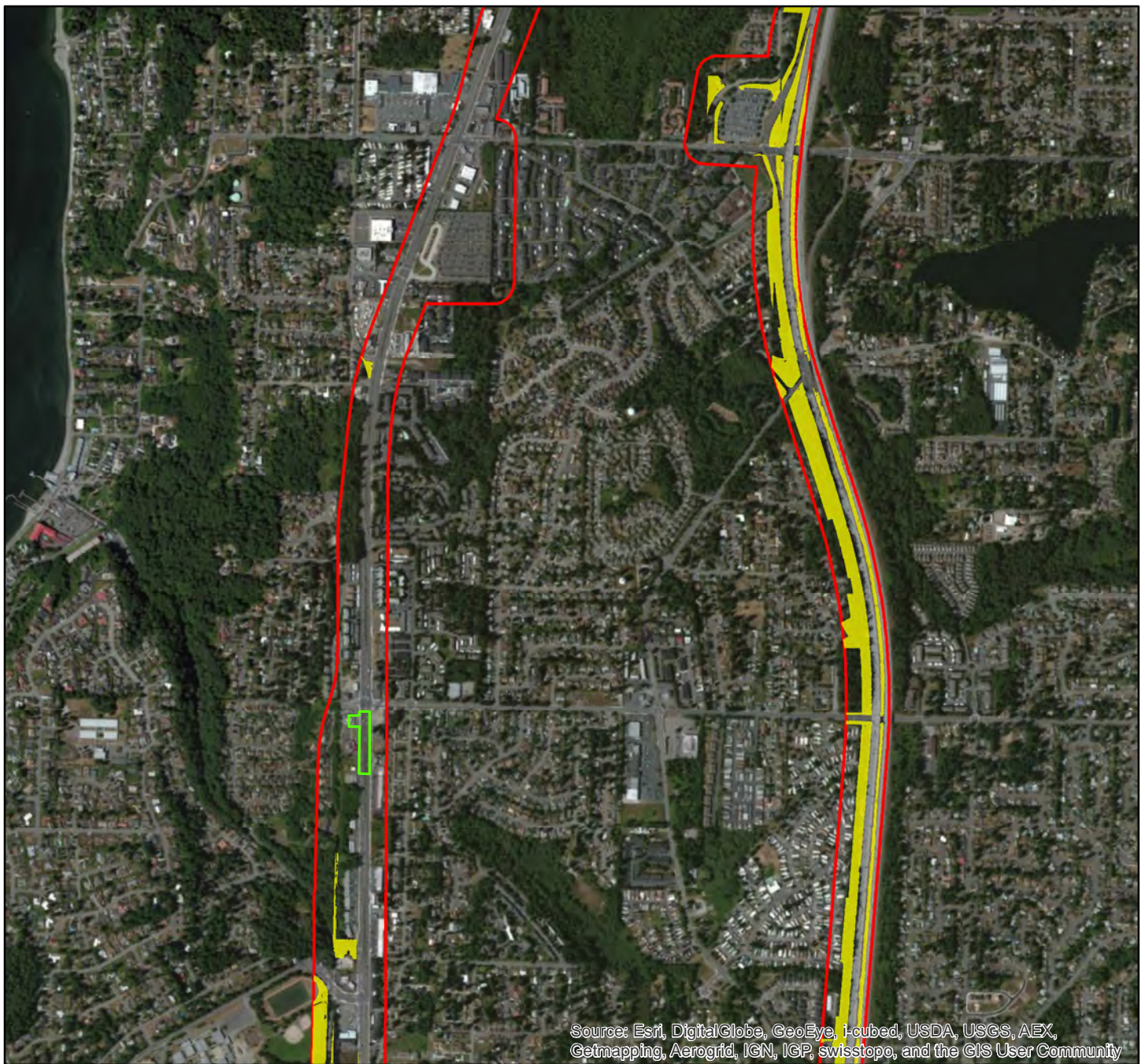


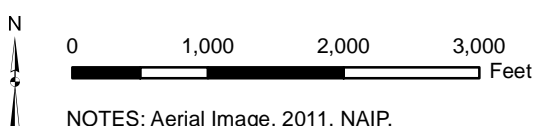
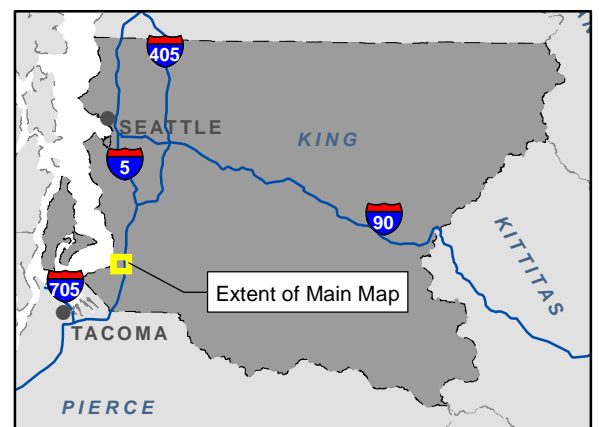
FIGURE 2
APE & Impervious Surface
Federal Way Link Extension Project
King County, WA



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NOTES: Aerial Image, 2011, NAIP.

FIGURE 2
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 Federal Way Link Extension Project
 King County, WA



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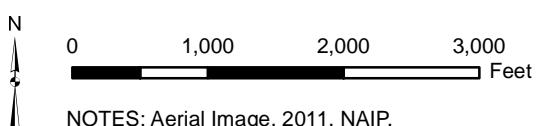
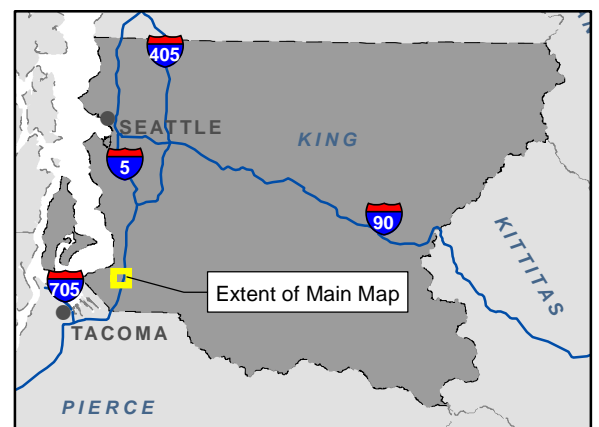


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA

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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Harry Smiskin
Tribal Chair
Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Harry Smiskin:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives to be evaluated in the Draft EIS are described below.

- **SR 99 Alternative:** The SR 99 alternative would consist of light rail guideway along the SR 99 median except for transitioning to the west side or east side of the roadway to access the three baseline stations at South Kent-Des Moines Road, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal Way Transit Center stations will be evaluated. The SR 99 alternative also includes additional station locations in the vicinities of South 216th Street and South 260th Street. An alignment option along the west side of SR 99 in Federal Way will also be evaluated.
- **I-5 Alternative:** The I-5 alternative consists of light rail guideway along the south side of the proposed SR 509 right-of-way (ROW) directly to I-5, then proceeding along the west side of the I-5 ROW. The guideway deviates west from the I-5 ROW near 317th Street to access the Federal Way Transit Center area. There would be three baseline stations at Kent-Des Moines, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal

Way Transit Center stations will be evaluated. Additionally an alignment option that transitions to the I-5 median to avoid the Midway Landfill is to be evaluated.

- SR 99/I-5 Alternative: The SR 99 to I-5 alternative would be the same as the SR 99 alternative till approximately Kent-Des Moines Road. Here it would transition to the I-5 corridor, with the Kent-Des Moines Station being located near 30th Avenue South, directly South of South 240th Street, this alternative would be the same as the I-5 alternative.
- I-5/SR 99 Alternative: The I-5 to SR 99 alternative would be the same as the I-5 alternative to approximately Kent-Des Moines Road, where it would transition to the SR 99 corridor, with the Kent-Des Moines Station located near 30th Avenue South, directly South of South 240th Street; this alternative would be the same as the SR 99 alternative.

Area of Potential Effect

The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

We look forward to your comments on the APE and the archaeological survey plan. So that we may move forward with the archaeological investigations, we respectfully request that you provide any comments within 30 days.

If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation
Matthew Sterner, DAHP
Kent Hale, Sound Transit

March 2013

FEDERAL WAY LINK EXTENSION

Research Design for Archaeological Fieldwork Draft 1



CENTRAL PUGET SOUND
REGIONAL TRANSIT AUTHORITY

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

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1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N, Range 4 E
Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

4.0 Preliminary Information

The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

5.0 Field Methodology

The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

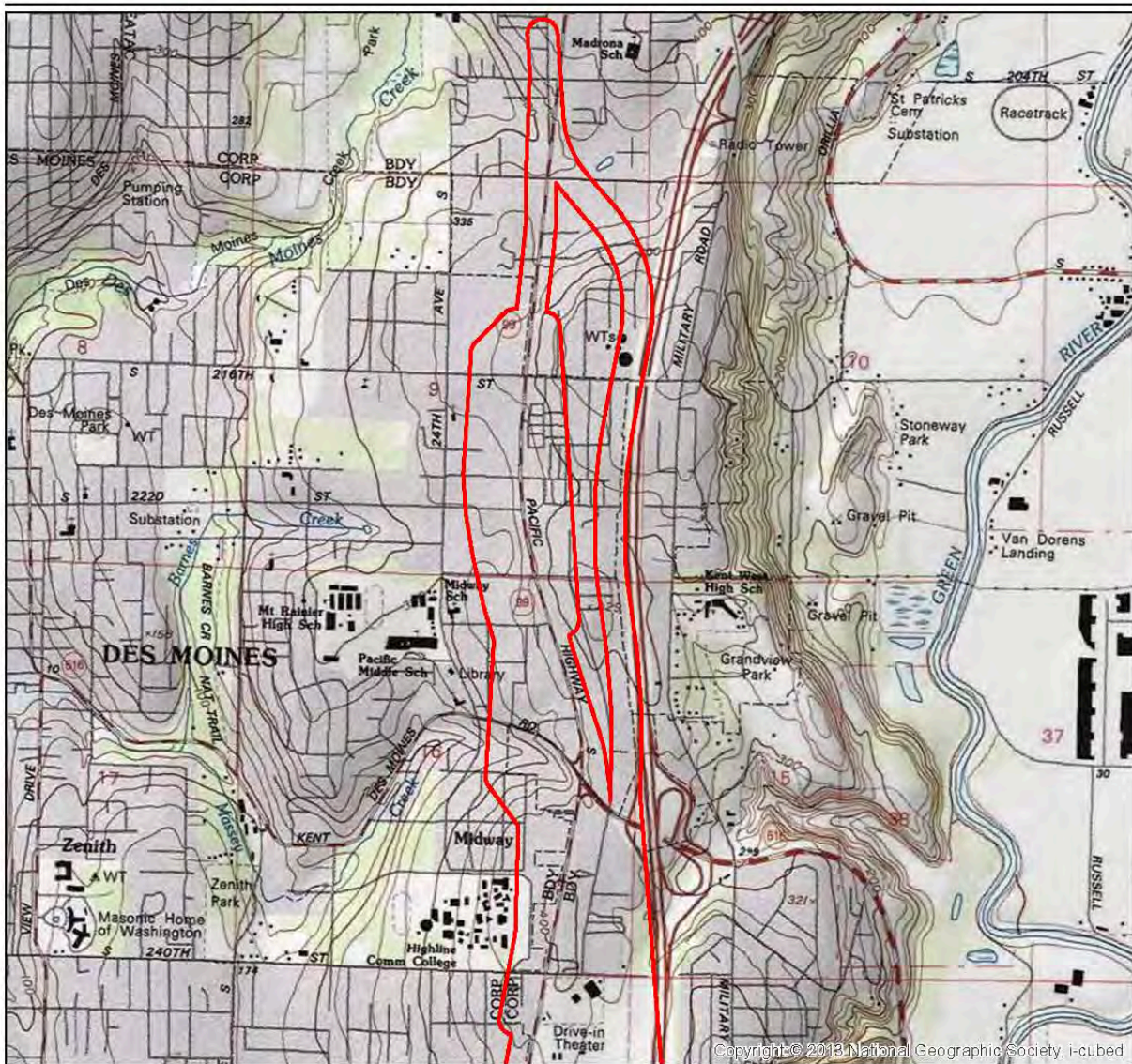
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

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 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
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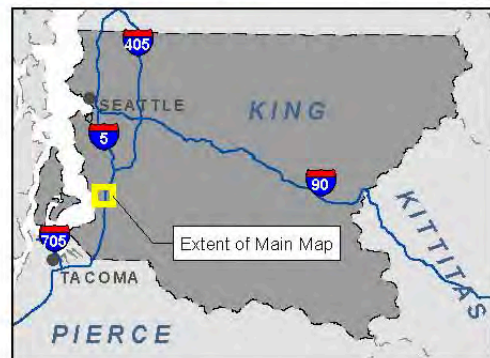
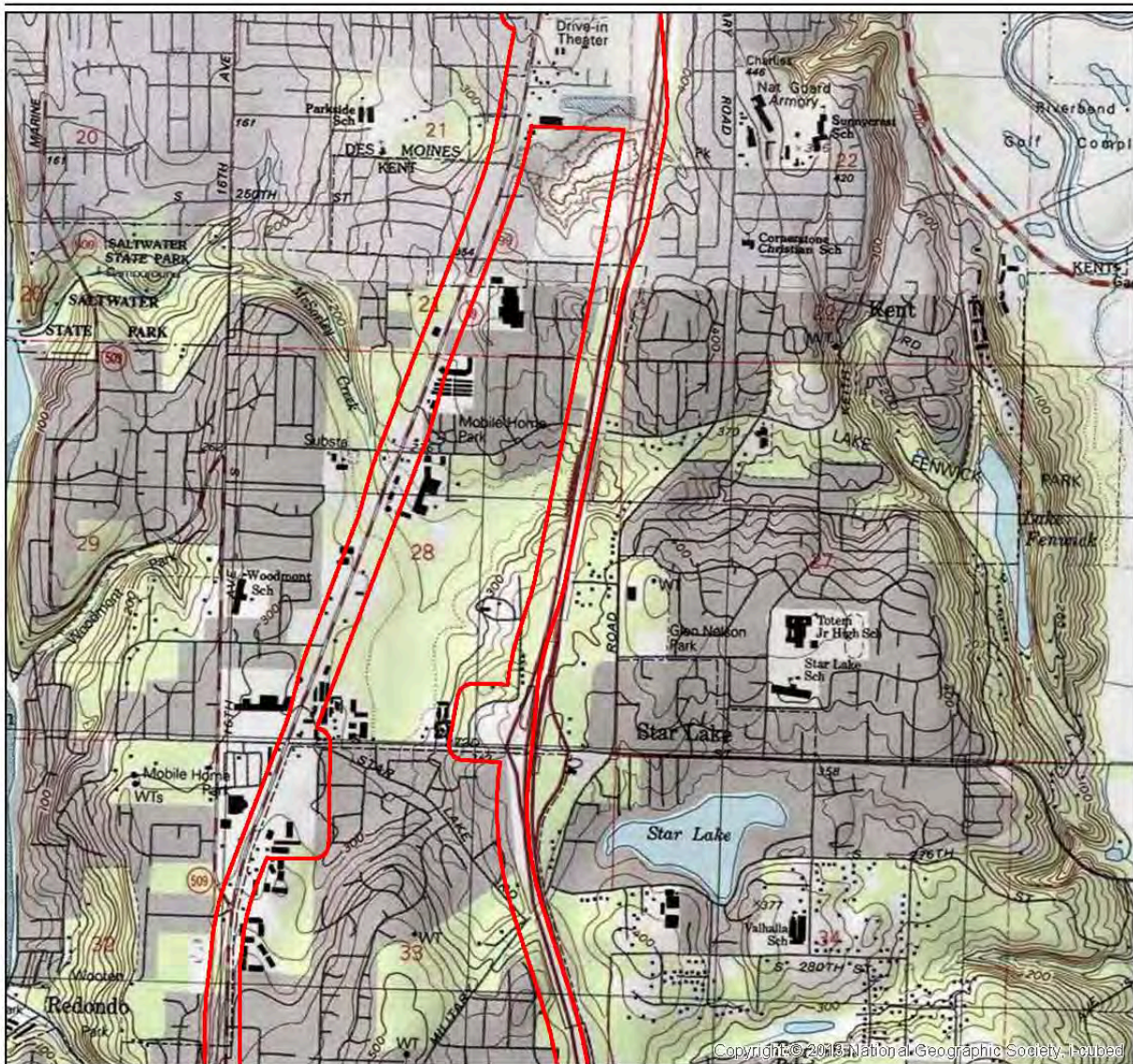


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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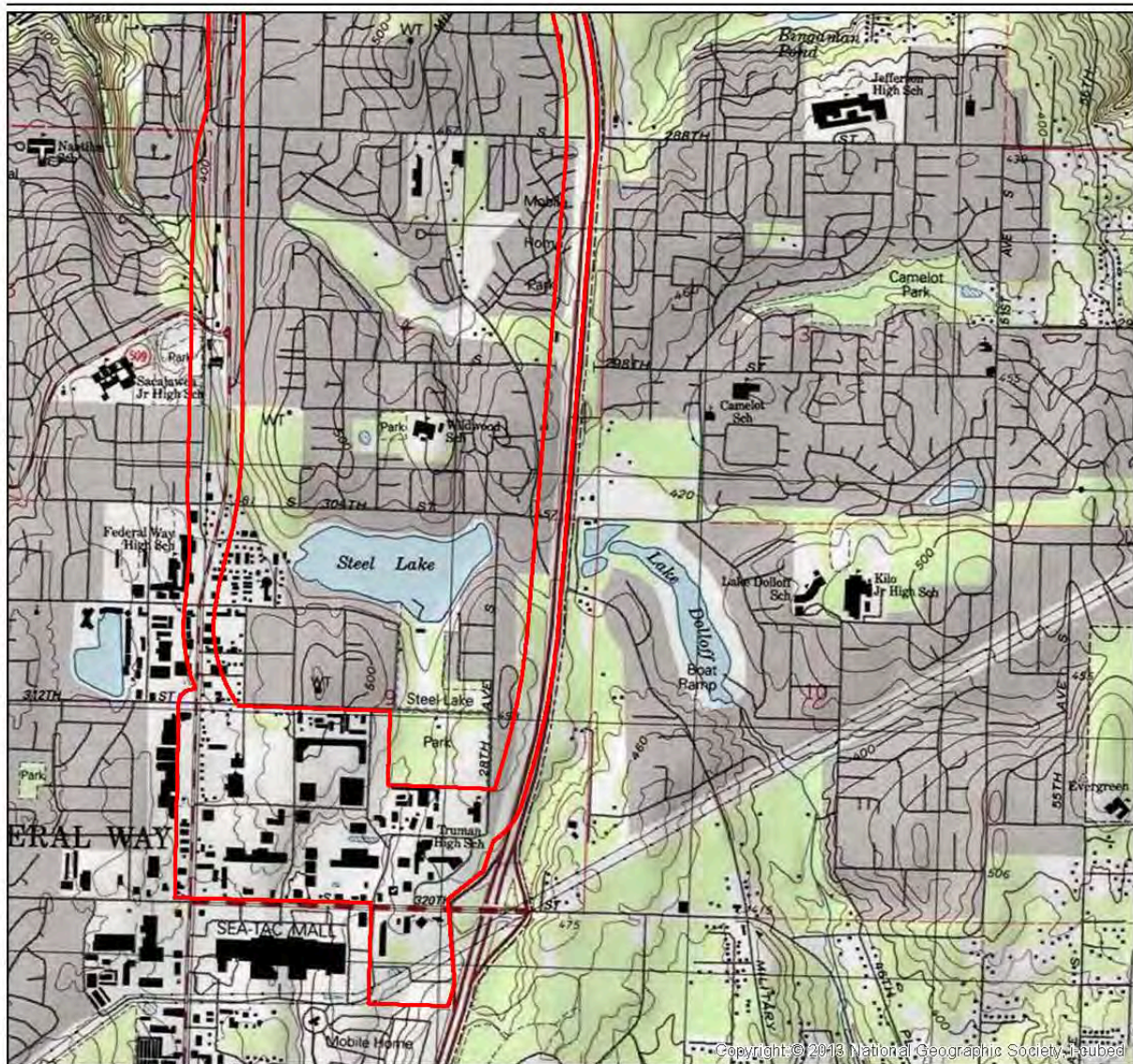


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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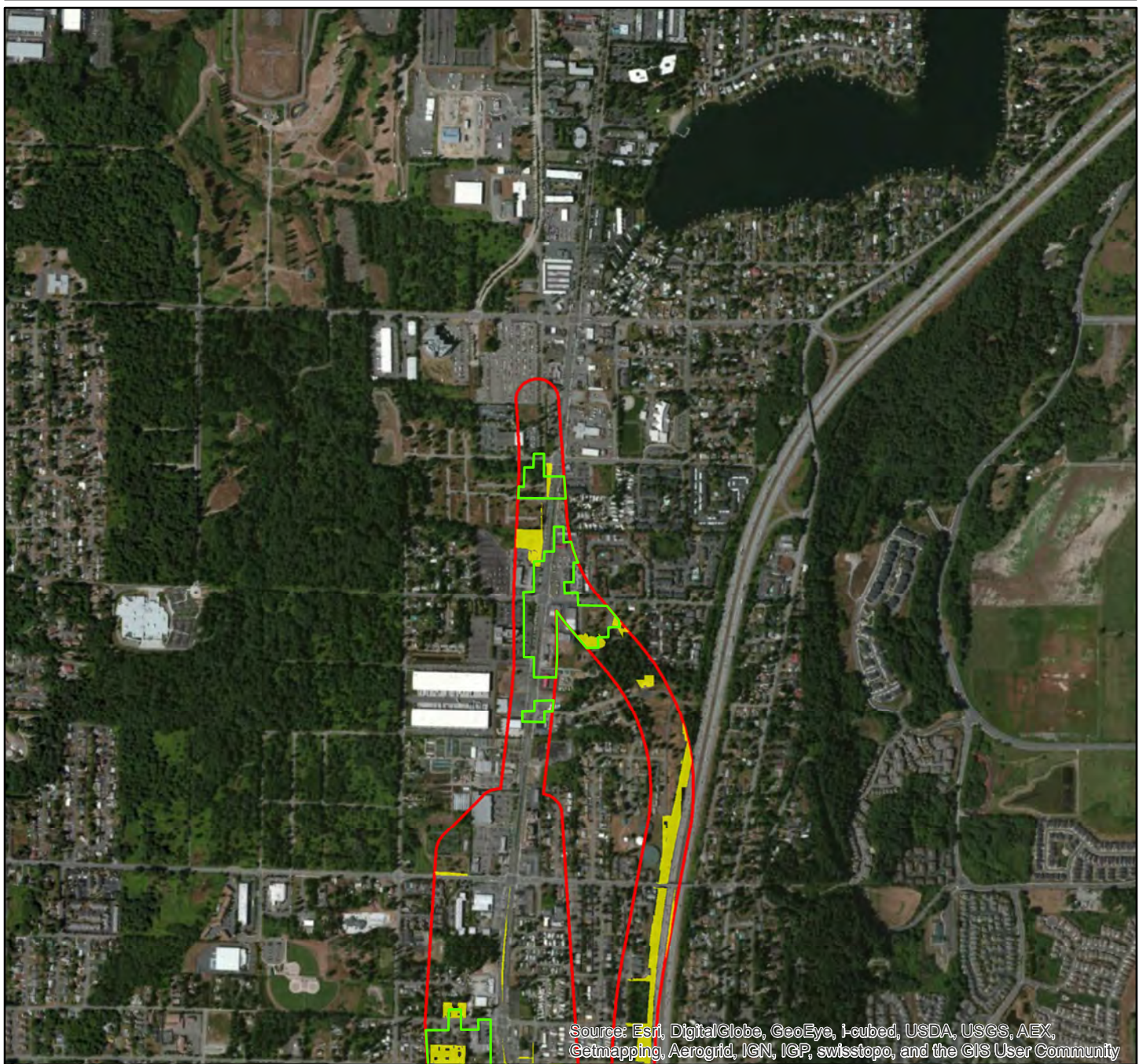


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
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Sources:
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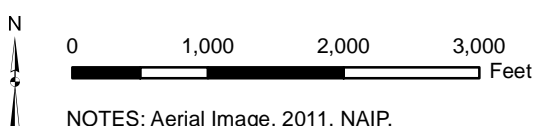
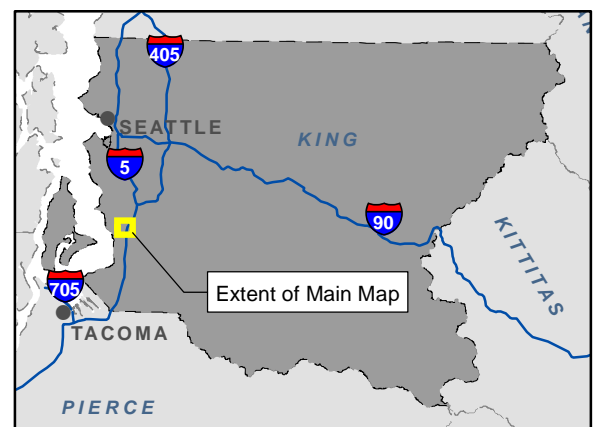
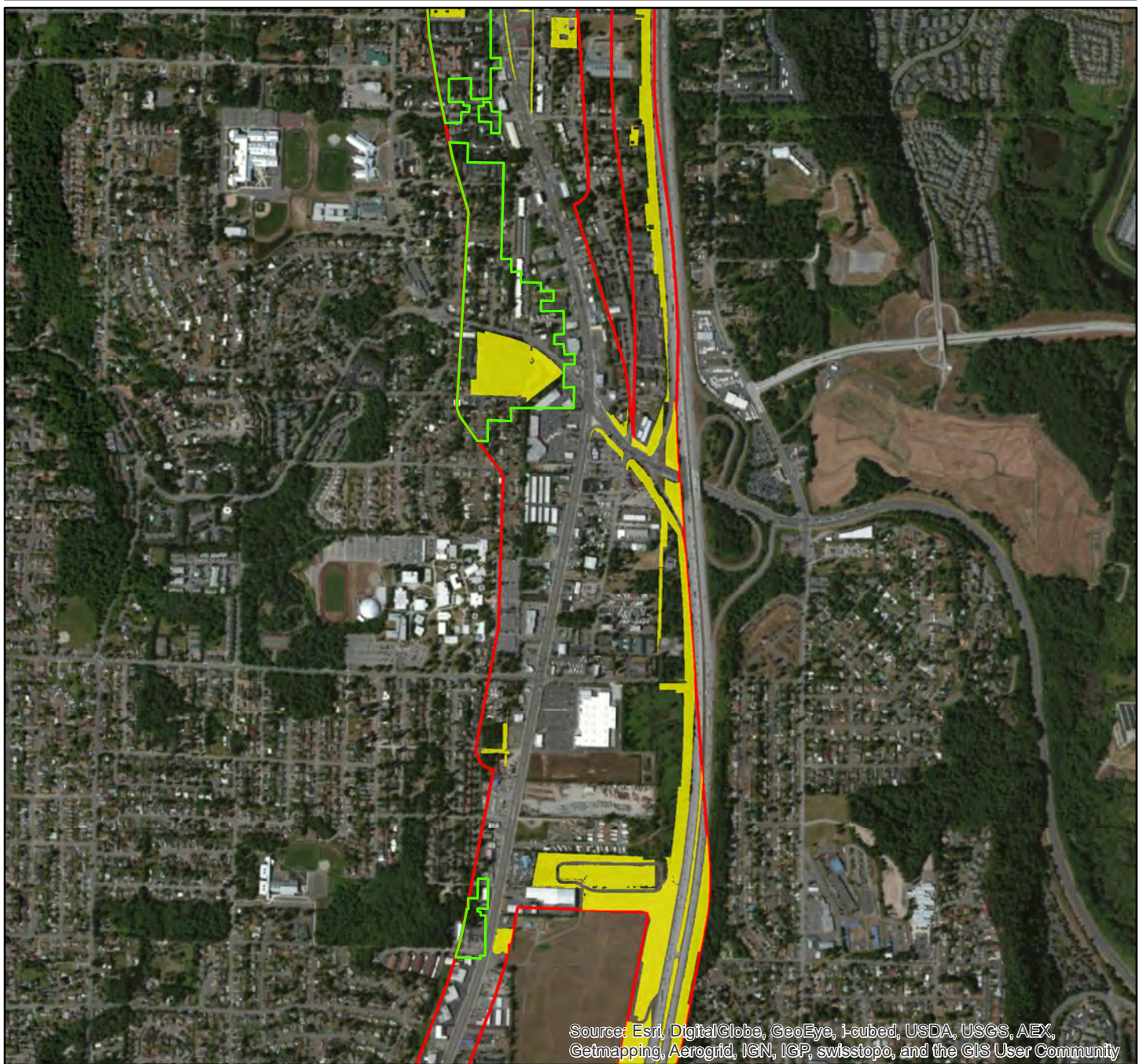


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



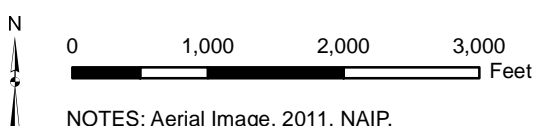
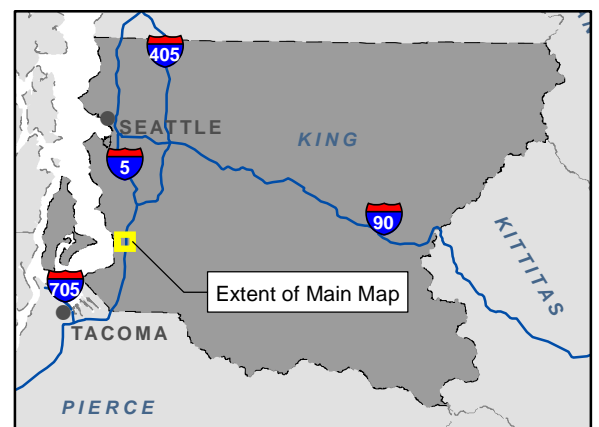
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Sources:

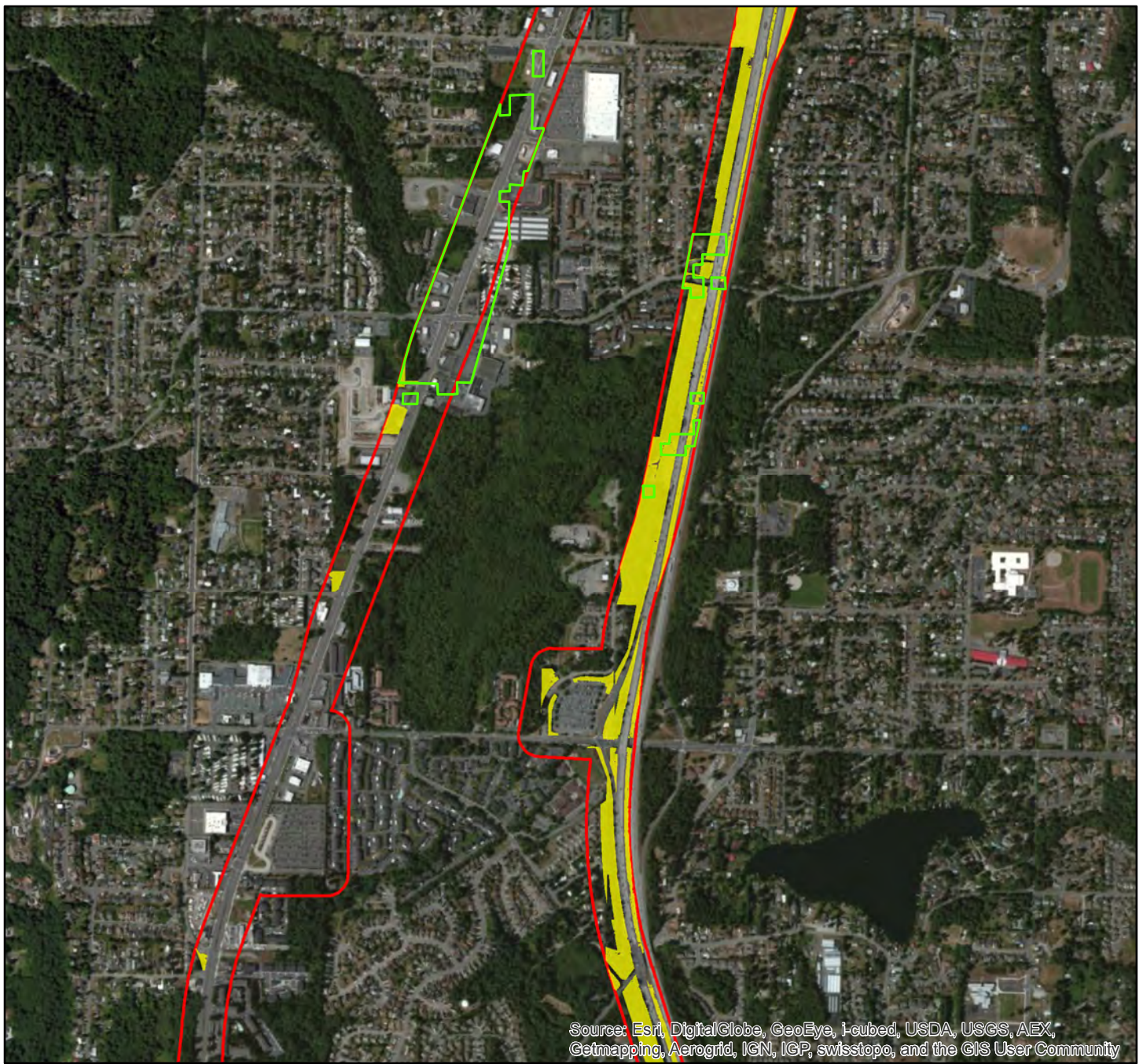
Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.

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NOTES: Aerial Image, 2011, NAIP.

FIGURE 2
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 King County, WA



Legend

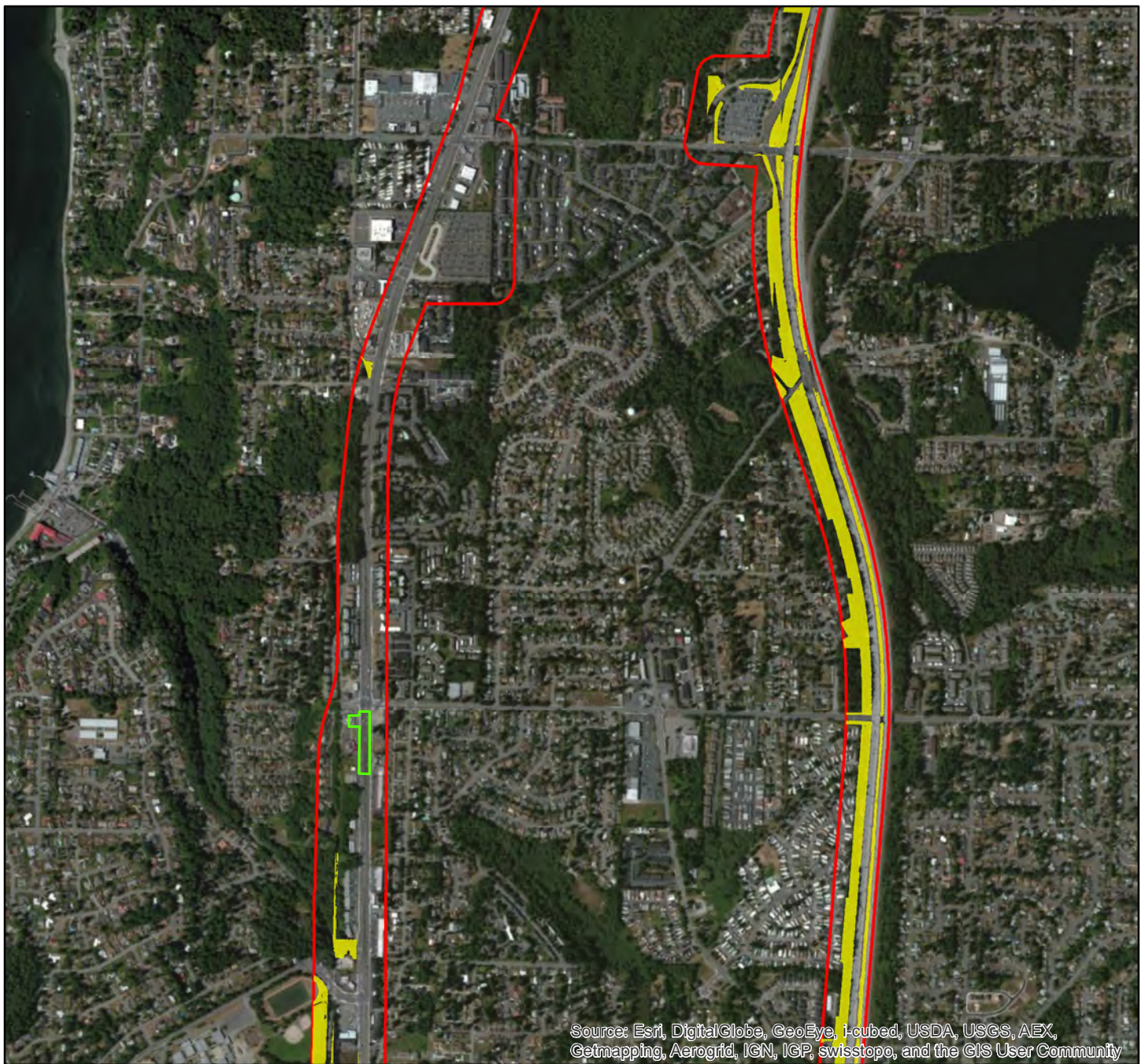
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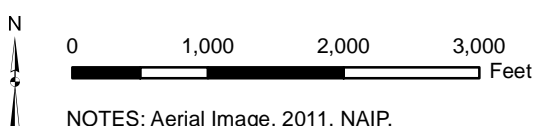
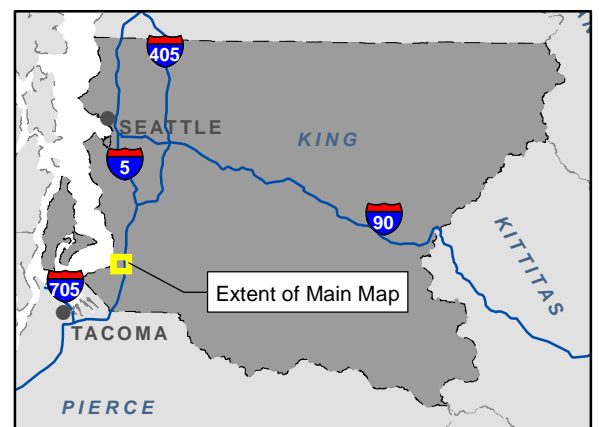


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:

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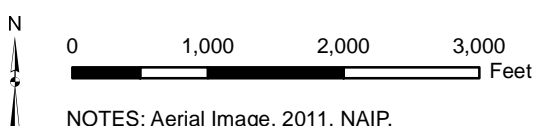
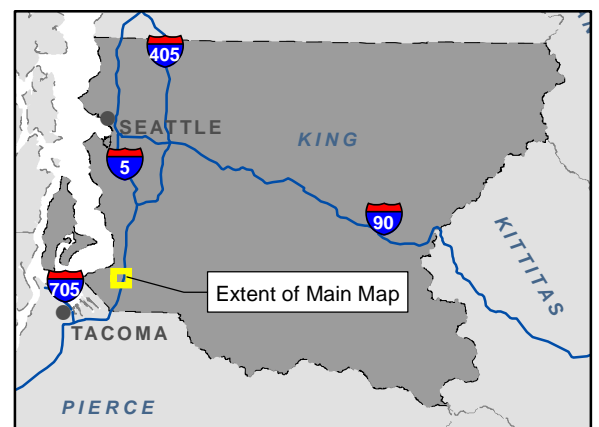


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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Shawn Yanity
Chairman
Stillaguamish Tribe of Indians
3310 Smokey Point Drive
Arlington, WA 98223

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Shawn Yanity:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives to be evaluated in the Draft EIS are described below.

- **SR 99 Alternative:** The SR 99 alternative would consist of light rail guideway along the SR 99 median except for transitioning to the west side or east side of the roadway to access the three baseline stations at South Kent-Des Moines Road, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal Way Transit Center stations will be evaluated. The SR 99 alternative also includes additional station locations in the vicinities of South 216th Street and South 260th Street. An alignment option along the west side of SR 99 in Federal Way will also be evaluated.
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Area of Potential Effect

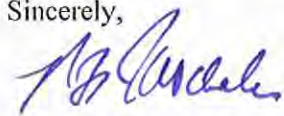
The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

We look forward to your comments on the APE and the archaeological survey plan. So that we may move forward with the archaeological investigations, we respectfully request that you provide any comments within 30 days.

If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Kerry Lyste, Stillaguamish Tribe of Indians
Matthew Sterner, DAHP
Kent Hale, Sound Transit

March 2013

FEDERAL WAY LINK EXTENSION

Research Design for Archaeological Fieldwork Draft 1



CENTRAL PUGET SOUND
REGIONAL TRANSIT AUTHORITY

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

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1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N, Range 4 E
Sections 4, 5, 8, 9, & 16
Township 22 N, Range 4 E
Sections 4, 9, 10, 15, 16, 21, 22, 28, 32, & 33

3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

4.0 Preliminary Information

The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

5.0 Field Methodology

The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

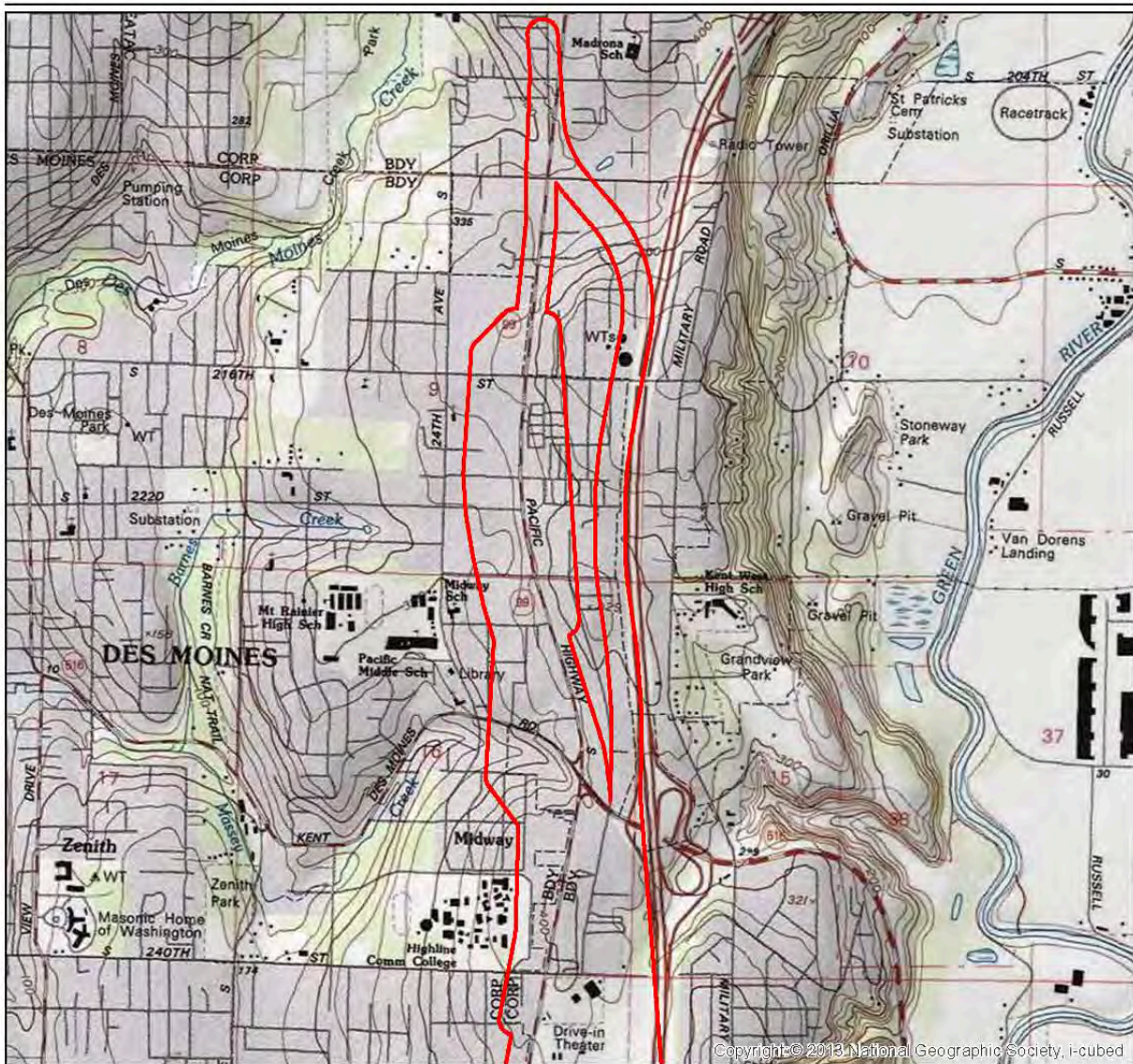
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

Archaeological sites and isolates, if encountered, will be documented and evaluated as needed to reach a finding of effect for the undertaking. Recommendations regarding the treatment of potentially eligible historic properties that may be identified will be included in the technical report. The technical report will be prepared meeting the Washington State Standards for Cultural Resource Reporting.



Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

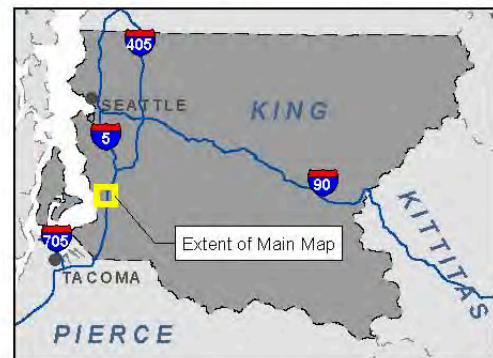
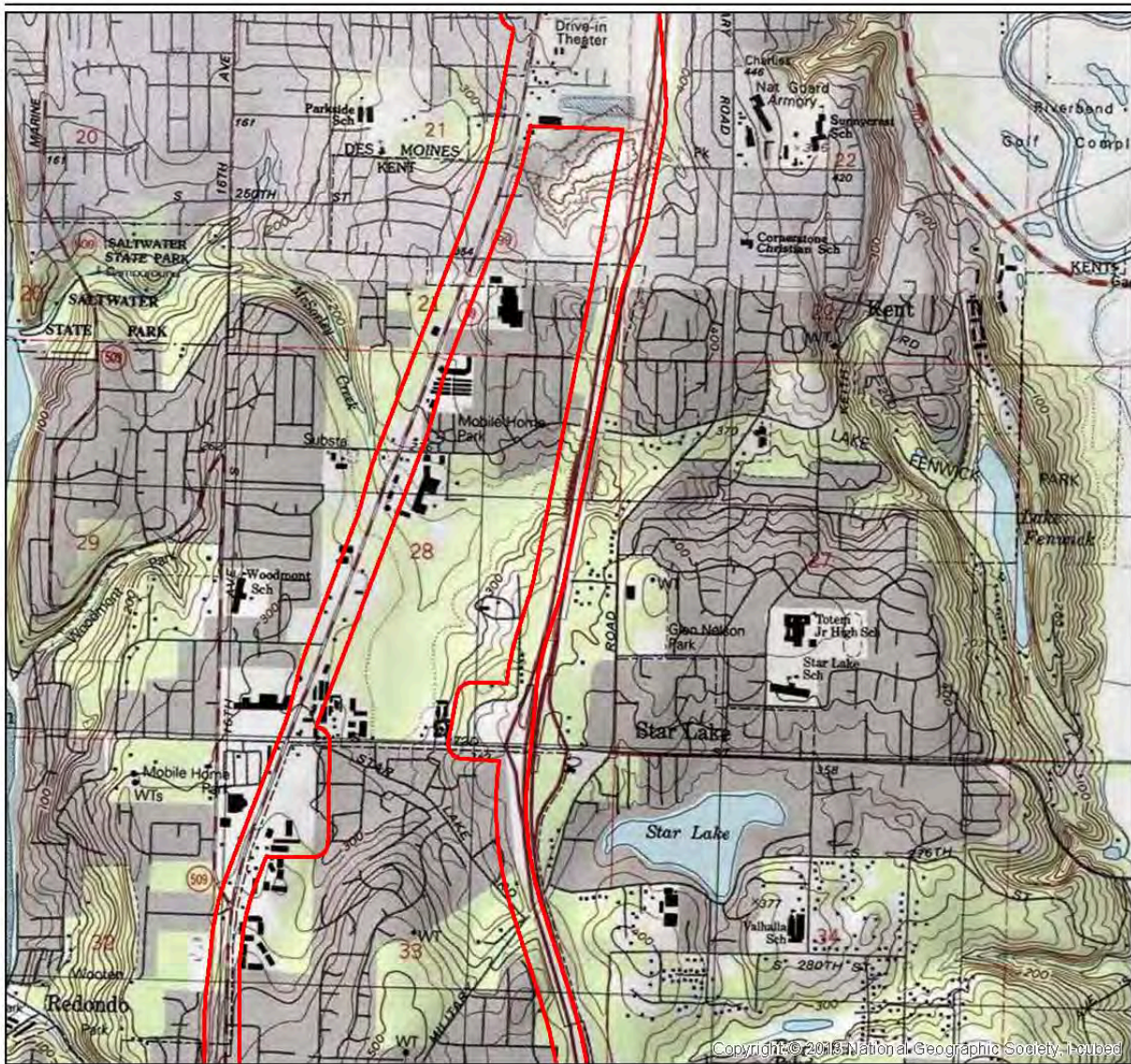


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
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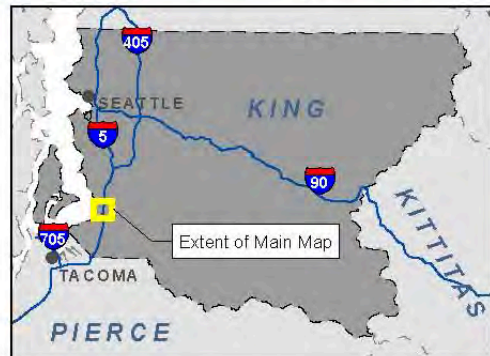
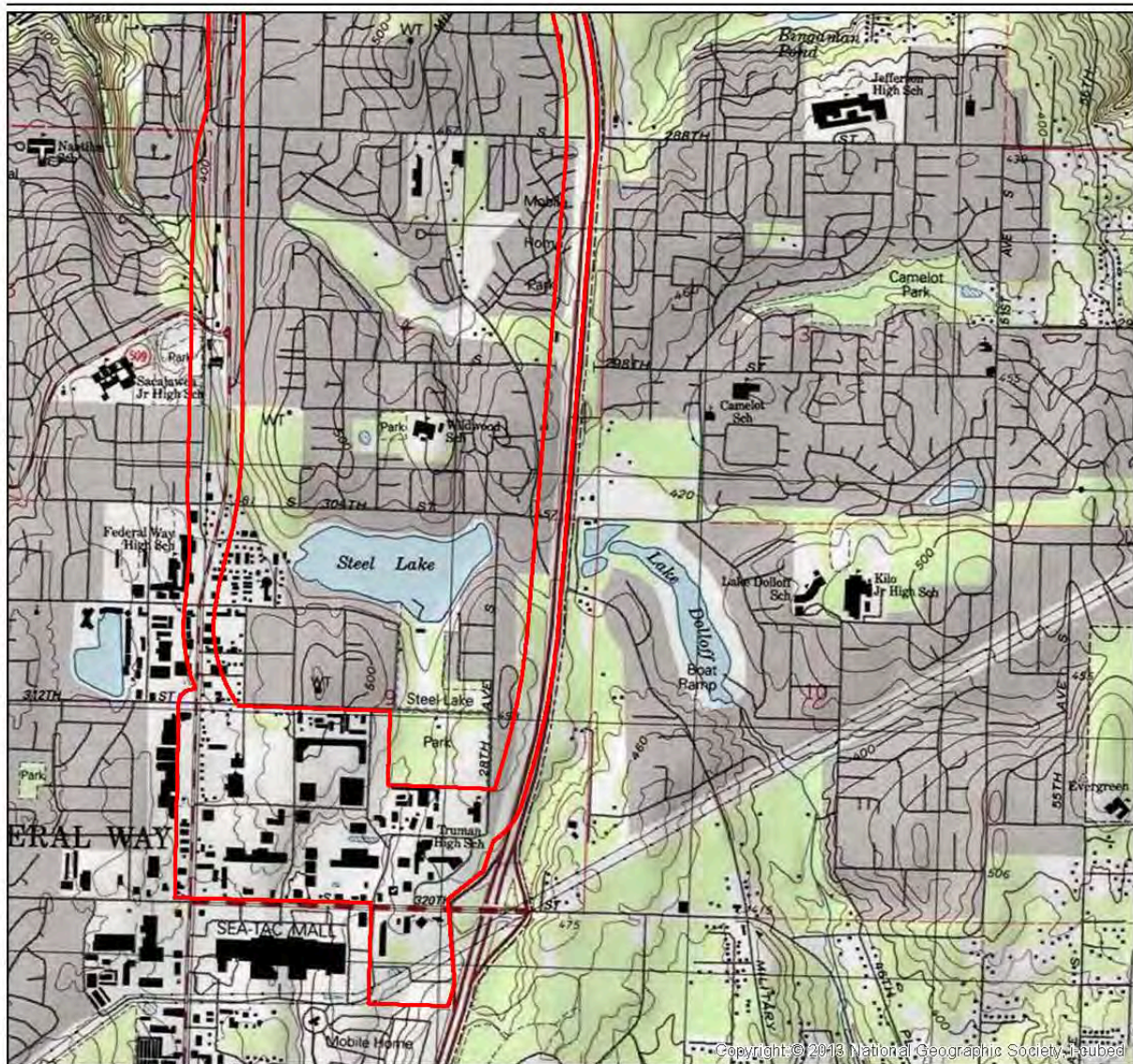


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



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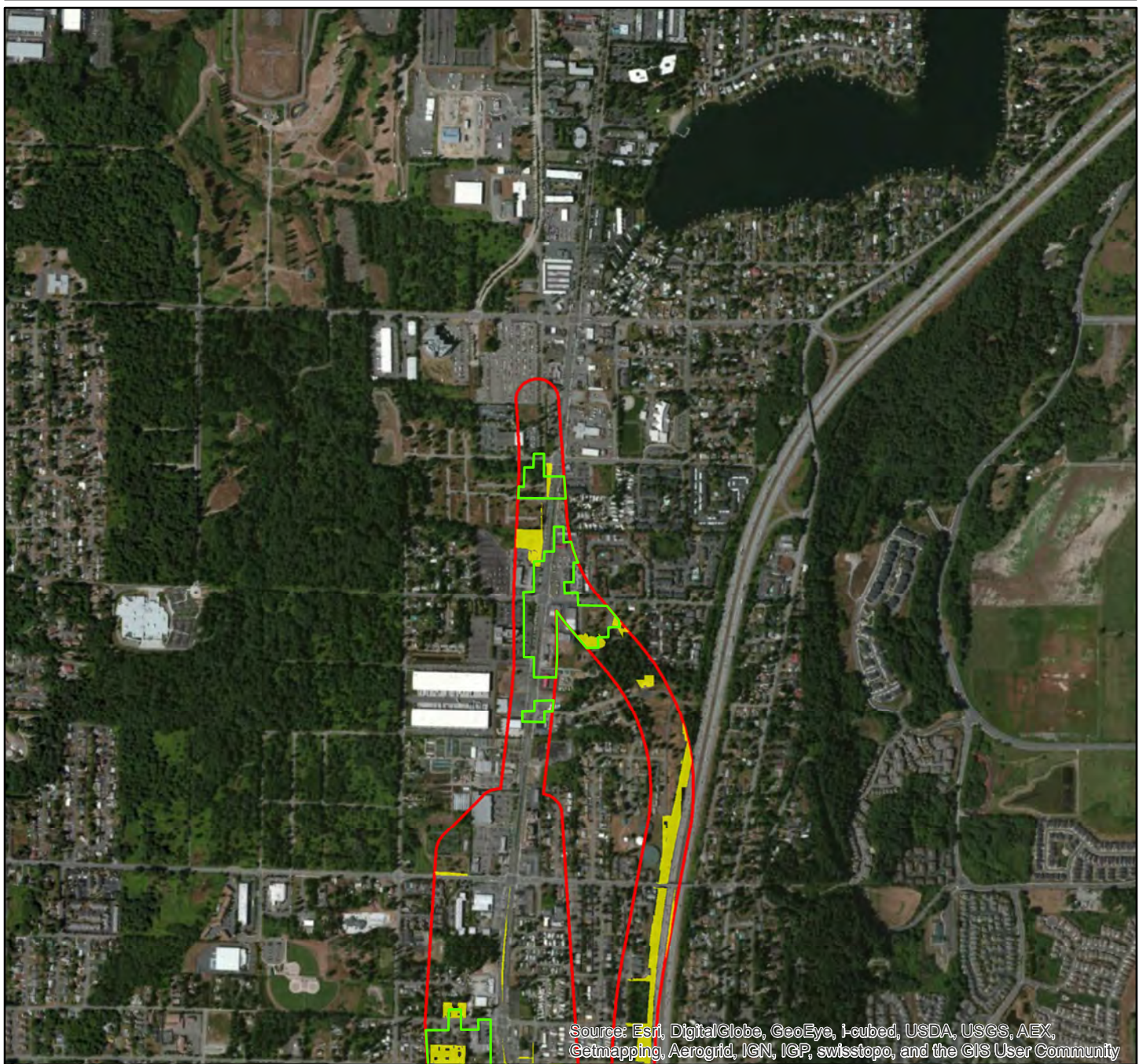


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FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
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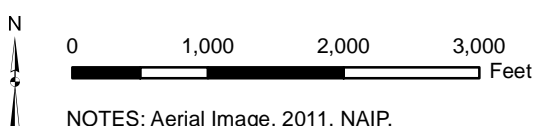
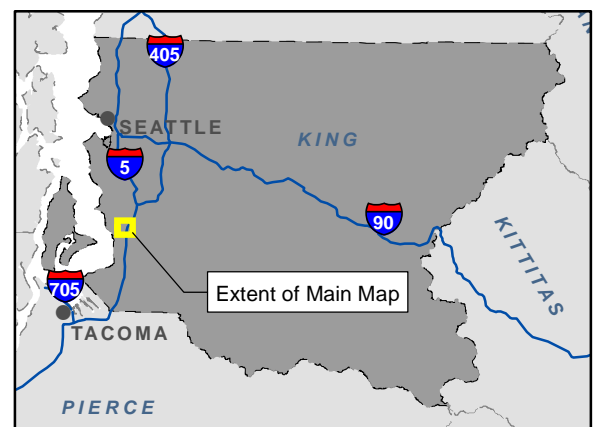
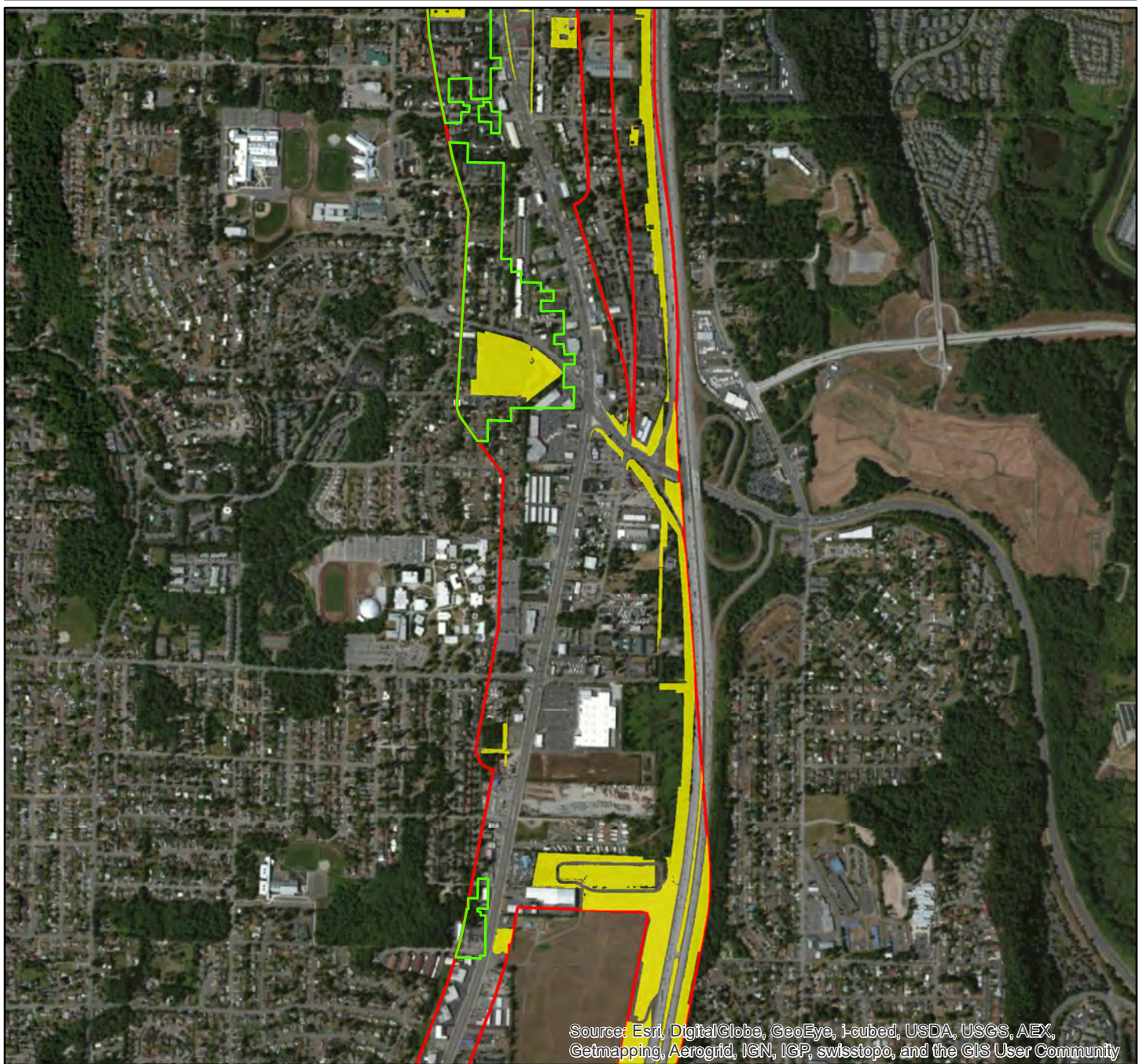


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APE & Impervious Surface
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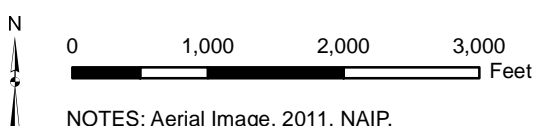
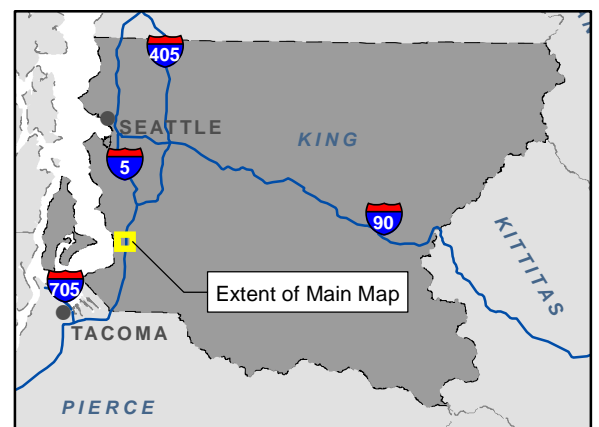
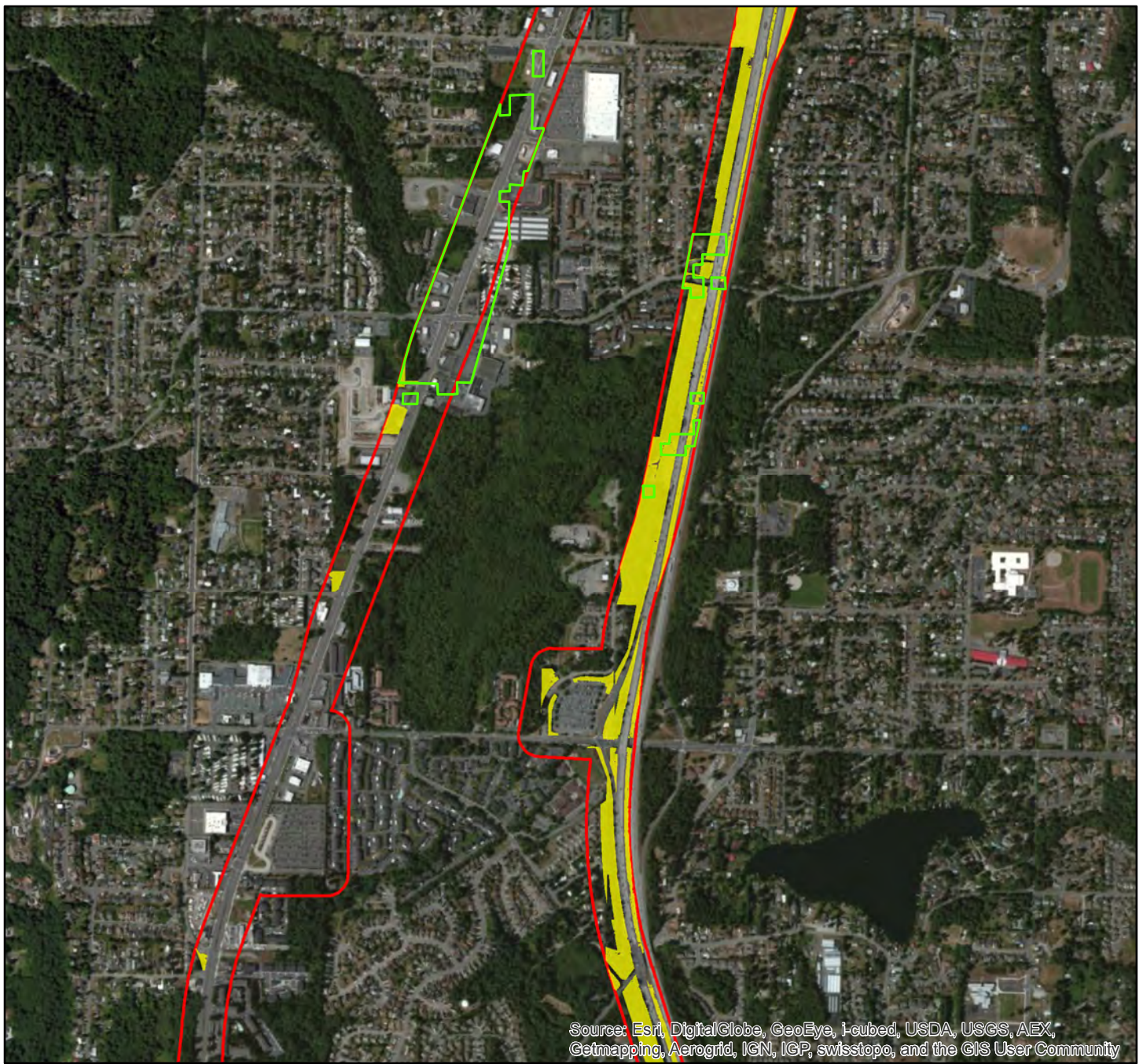


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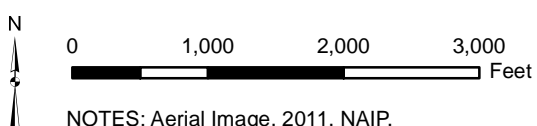
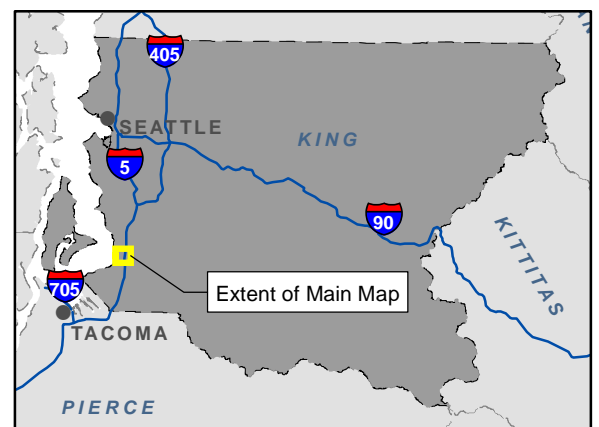
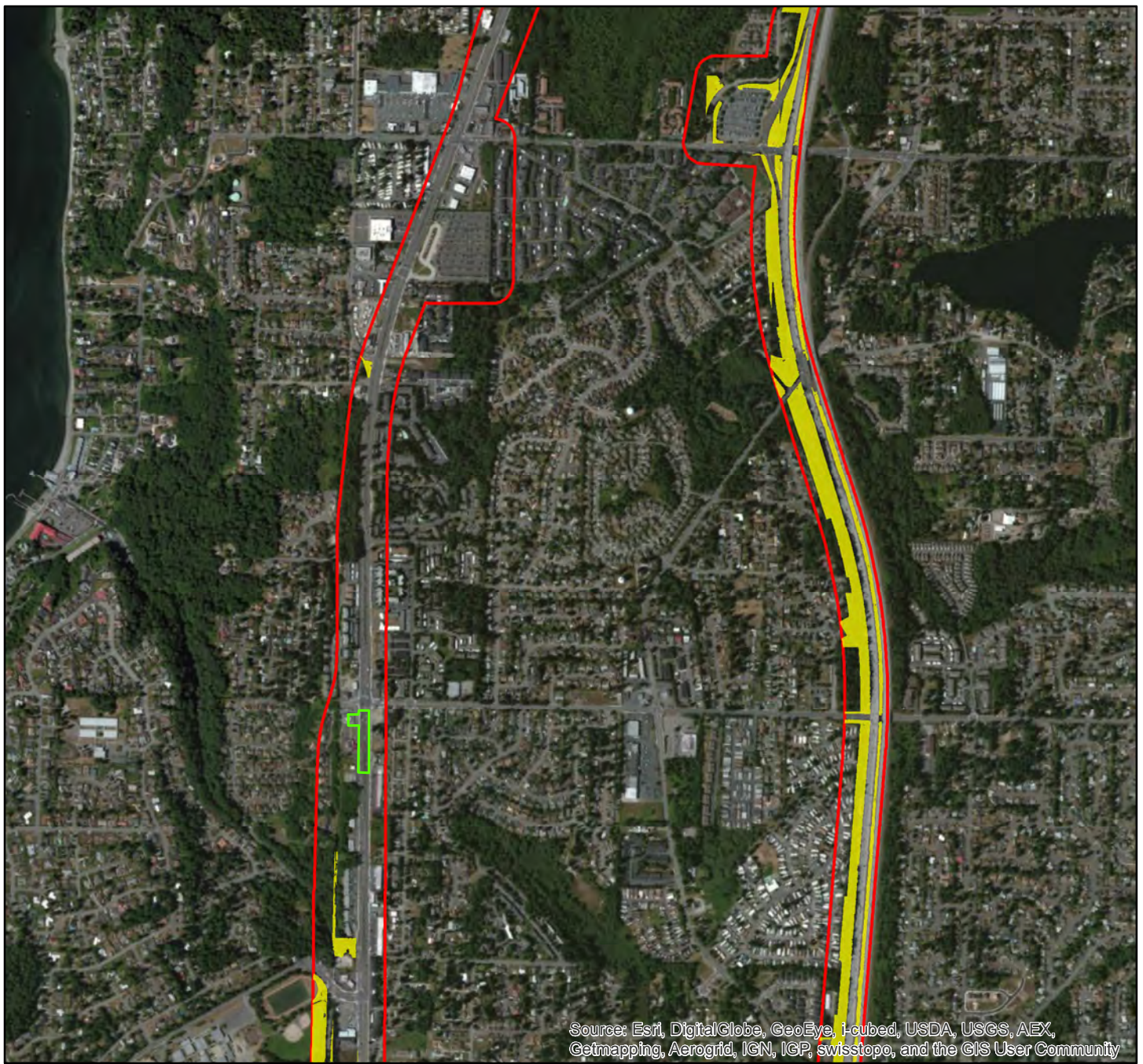


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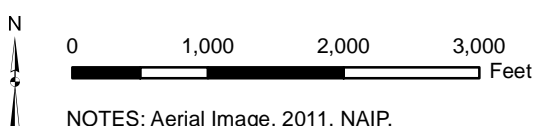
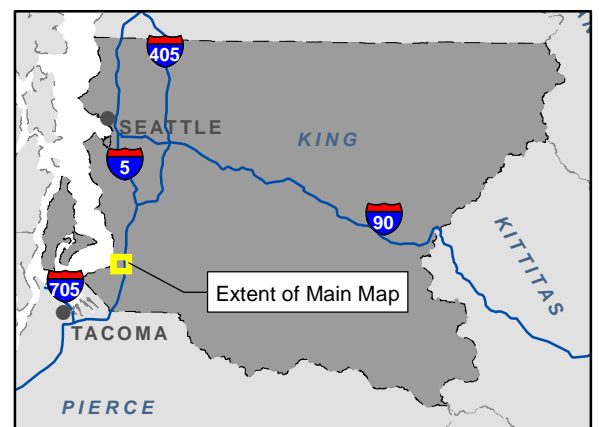


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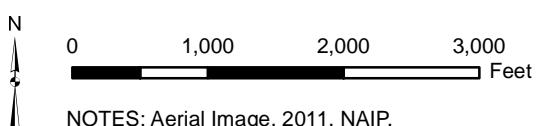
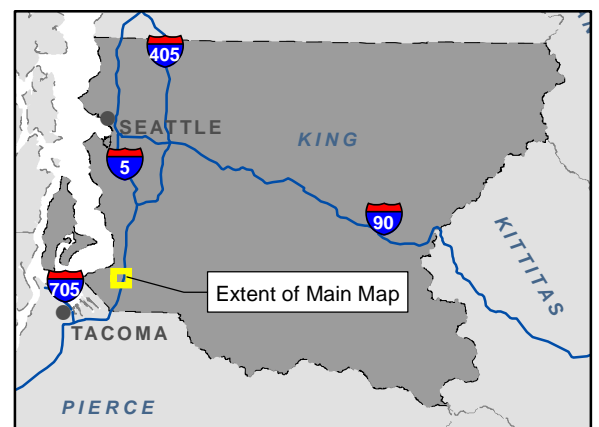


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U.S. Department
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915 Second Avenue
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206-220-7954
206-220-7959 (fax)

April 2, 2014

Virginia Cross
Tribal Chair
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

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Area of Potential Effect & Archaeological Survey Plan**

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R.F. Krochalis
Regional Administrator

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cc: Laura Murphy, Muckleshoot Indian Tribe
Matthew Sterner, DAHP
Kent Hale, Sound Transit

March 2013

FEDERAL WAY LINK EXTENSION

Research Design for Archaeological Fieldwork Draft 1



CENTRAL PUGET SOUND
REGIONAL TRANSIT AUTHORITY

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

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3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

Phase I will occur during preparation of the Draft EIS within public right-of-way and publicly owned parcels where access has been granted. For all other parcels (public and private), only the reconnaissance survey will be completed prior to the Draft EIS. Areas identified for a more intensive Phase I survey will be surveyed after the Preferred Alternative has been identified and before the Final EIS, where access can be obtained. If access to these parcels cannot be obtained prior to the Final EIS, the more intensive survey will occur during final design once the property has been acquired by Sound Transit. If areas requiring a Phase II survey are identified prior to the Final EIS, this survey will be completed and a determination of eligibility will be submitted to DAHP.

4.0 Preliminary Information

The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

5.0 Field Methodology

The Phase I fieldwork will include an archaeological survey consisting of background research of areas recently surveyed, review of the statewide predictive model provided by DAHP, a review of available geologic information from geotechnical borings and the Washington State Department of Natural Resources, and a reconnaissance level survey of portions of the APE that contain native sediments and have not been surveyed within the past 5 years. The reconnaissance survey will include inspecting portions of the APE to identify locations appropriate for further archaeological investigations, or Areas of Interest (AOIs).

Once AOIs are identified, an archaeological survey will be conducted in accordance with the guidelines provided by DAHP. Crew members will survey in parallel linear transects spaced no more than 30 meters (98 feet) apart. Any cultural materials identified will be documented and photographed. It is expected that where the ground is not covered in impermeable surfaces (asphalt, concrete, or compacted gravel), ground surfaces will be obscured by vegetation. At the discretion of the Project Archaeologist, locations will be identified where subsurface test units (STUs) may be employed to sample sediments in these areas. STUs will be excavated minimally to 60 centimeters (cm) (2 feet) below the ground surface or until obstructed. All sediments will be screened through a 0.6-cm (1/4-inch) wire mesh screen. If buried cultural materials are encountered in any STU, one STU will be excavated up to 4.5 meters (15 feet) away in each cardinal direction (north, south, east, and west) to establish site boundaries without intruding on impervious surfaces, or areas outside of the APE. Where access and site conditions allow, this method will be employed until two adjacent sterile STUs are encountered. Field documentation will include descriptions of the stratigraphic profile, soil type descriptions, and descriptions of any cultural

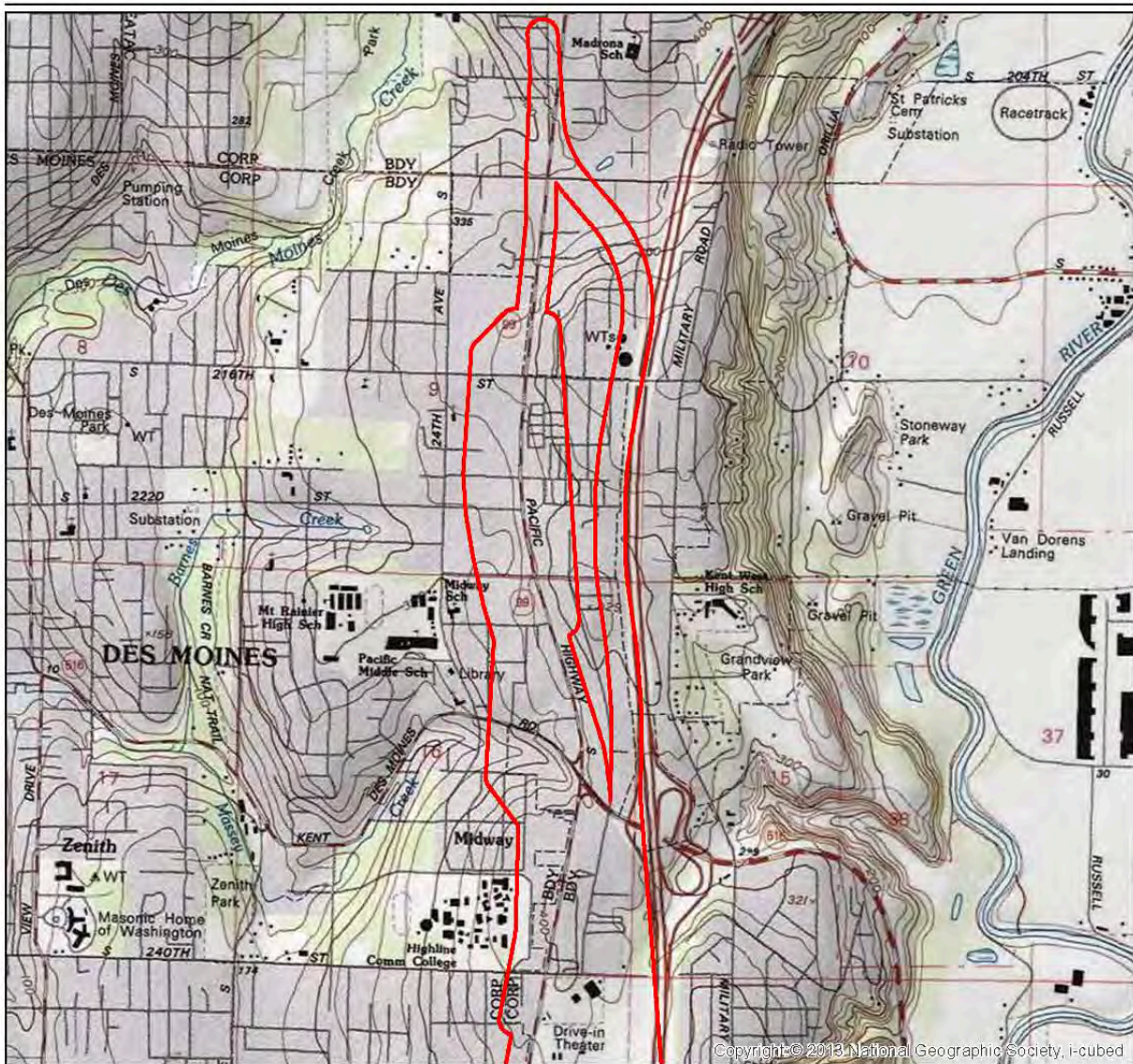
materials identified. Global Positioning System (GPS) coordinates and photographs will be collected for each STU. Any artifacts encountered will be analyzed, photographed, and recorded in the field, then reburied in the STU from which they originated. Collection of artifacts is not proposed for this phase of the study. An archaeologist will also review boring logs for any geotechnical borings during development of the Final EIS.

Once site boundaries have been established, the information gathered will be used to complete a Washington State Site or Isolate Inventory Form, as appropriate. Recommendations for site eligibility will be provided where possible, but this phase does not include formal Phase II evaluations that include completion of National Register Evaluation Forms. Per Washington State law (Revised Code of Washington 19.122 E2SHB 1634), it is assumed that utility locates will be conducted prior to the initiation of any subsurface archaeological testing. If no potentially eligible archaeological sites are discovered in the course of the survey, no additional fieldwork (Phase II) will be required. If potentially eligible archaeological sites are discovered, formal Phase II investigations may be recommended. Phase II investigations (evaluations) will be conducted once the Preferred Alternative is identified where potentially National Register eligible sites that cannot be avoided are discovered. A Phase II survey plan will be prepared if and when necessary.

6.0 Report

The results of the archaeological survey will be incorporated into the FWLE Historic and Archaeological Resources Technical Report completed for this undertaking. The results from Phase 1 on accessible properties will be incorporated into the version of this technical report released with the Draft EIS. The results from any additional properties where access will be gained between the Draft EIS and the Final EIS will be incorporated into the version of this technical report released with the Final EIS.

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Legend

Area of Potential Effects (APE)

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
 Township 21 N Range 4 E
 Sections 4, 5, 8, 9 & 16
 Township 22 N Range 4 E
 Sections 4, 9, 10, 15, 16, 21, 22, 28, 32 & 33



0 0.25 0.5 0.75 1 mi

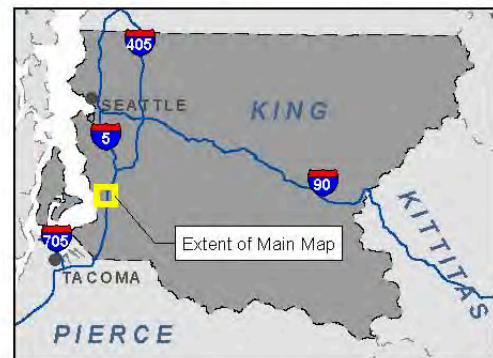
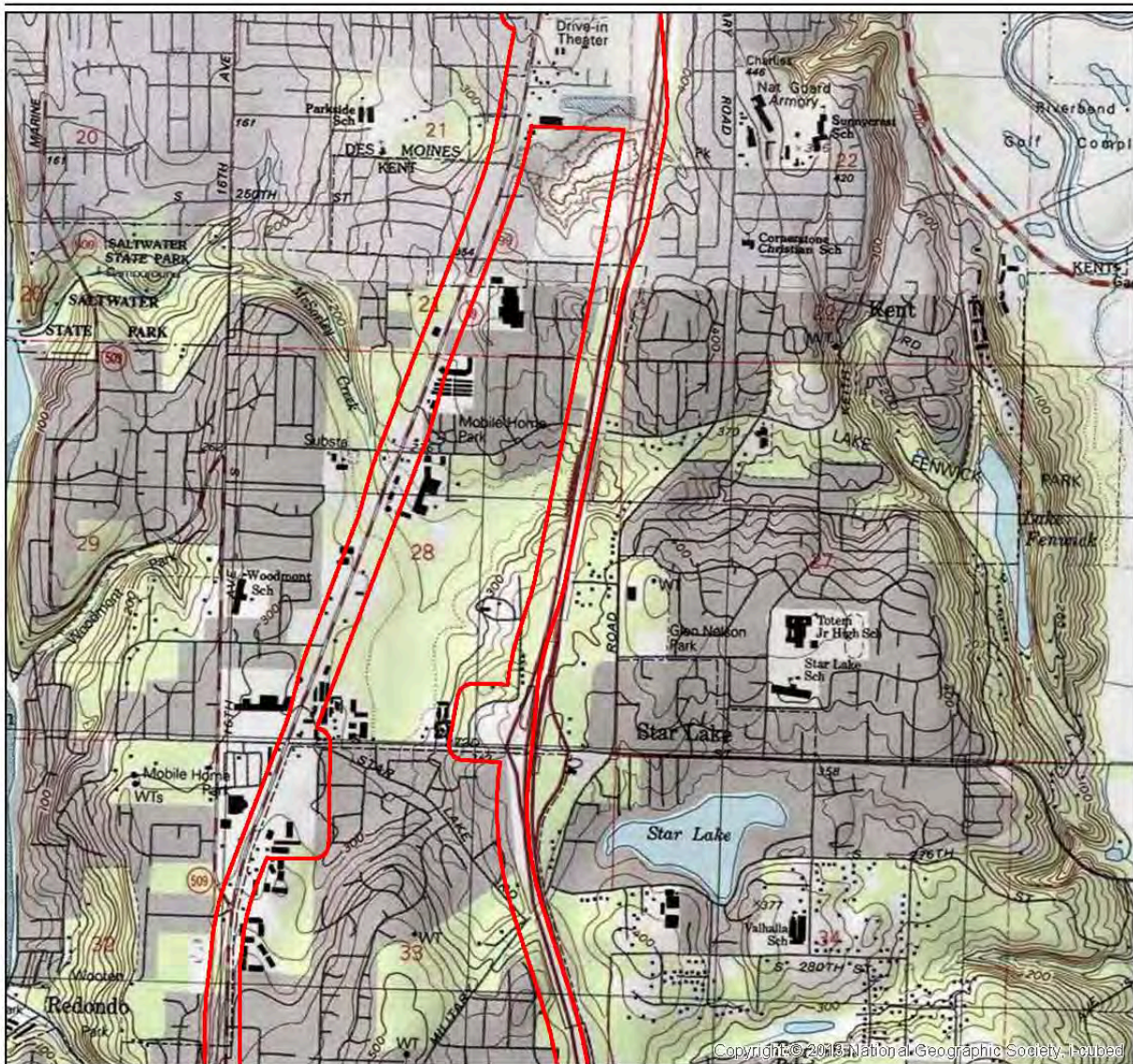


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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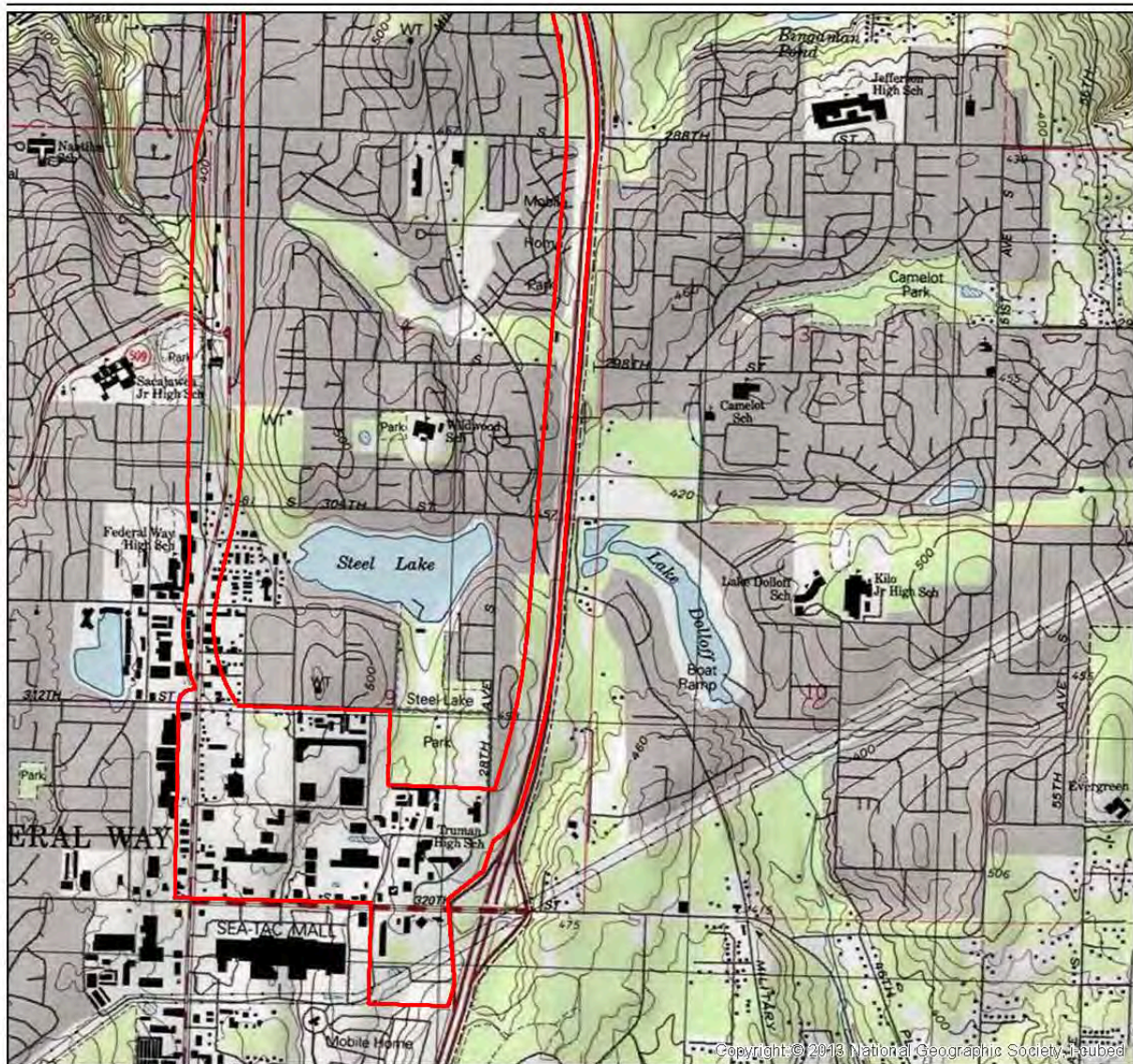


0 0.25 0.5 0.75 1 mi



FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

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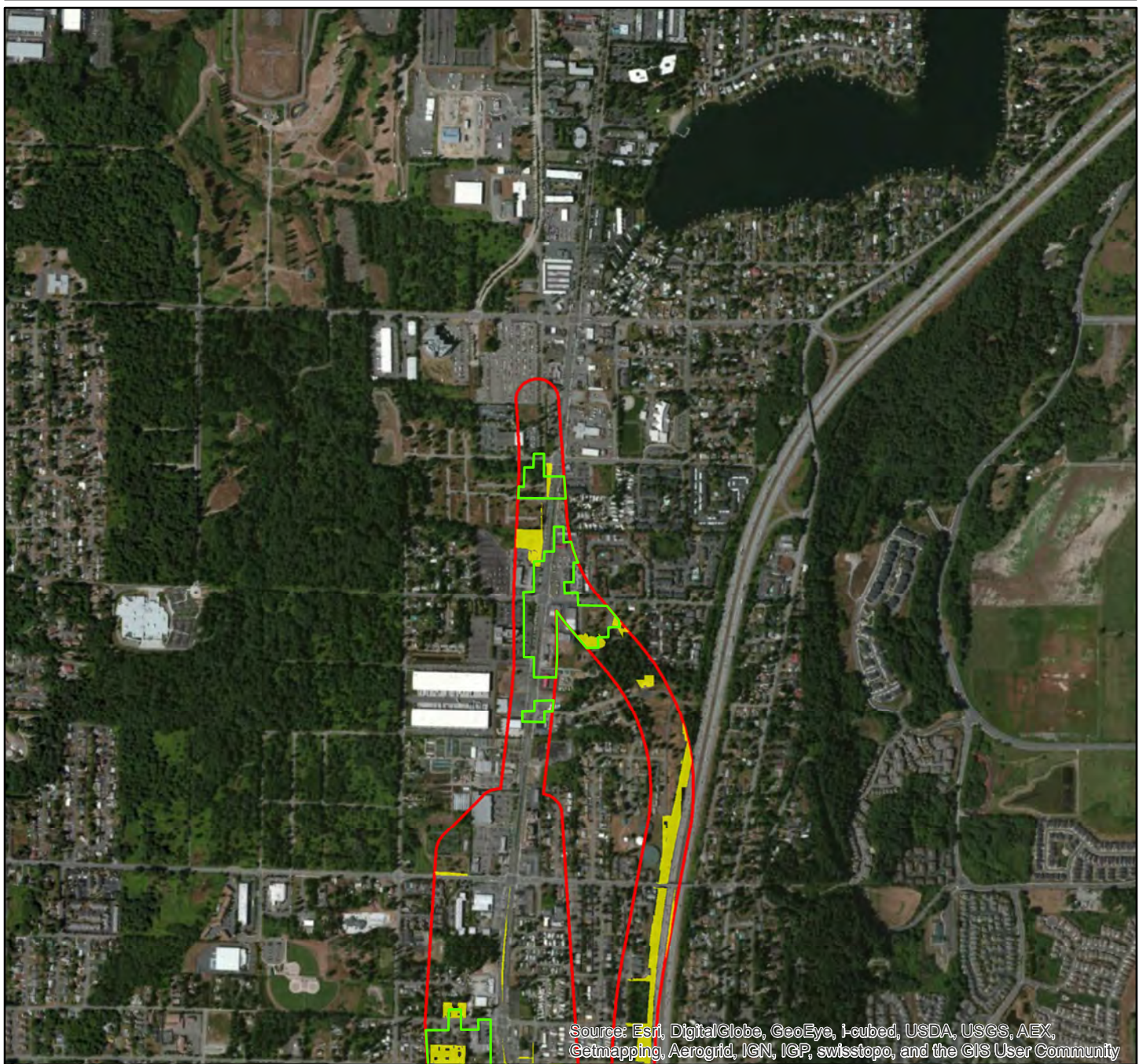


0 0.25 0.5 0.75 1 mi



FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
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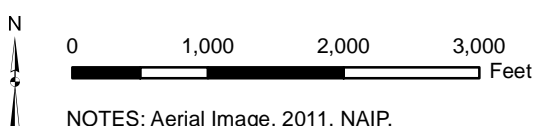
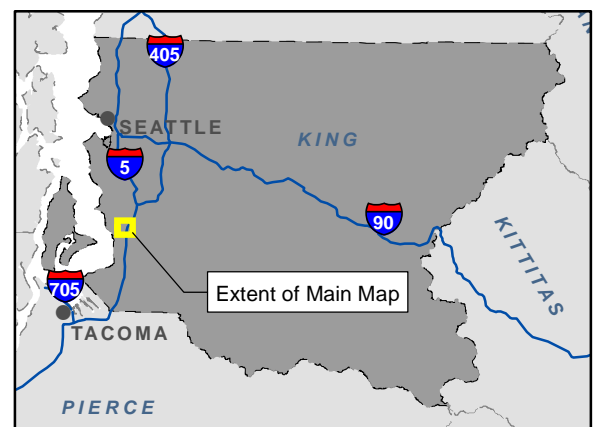
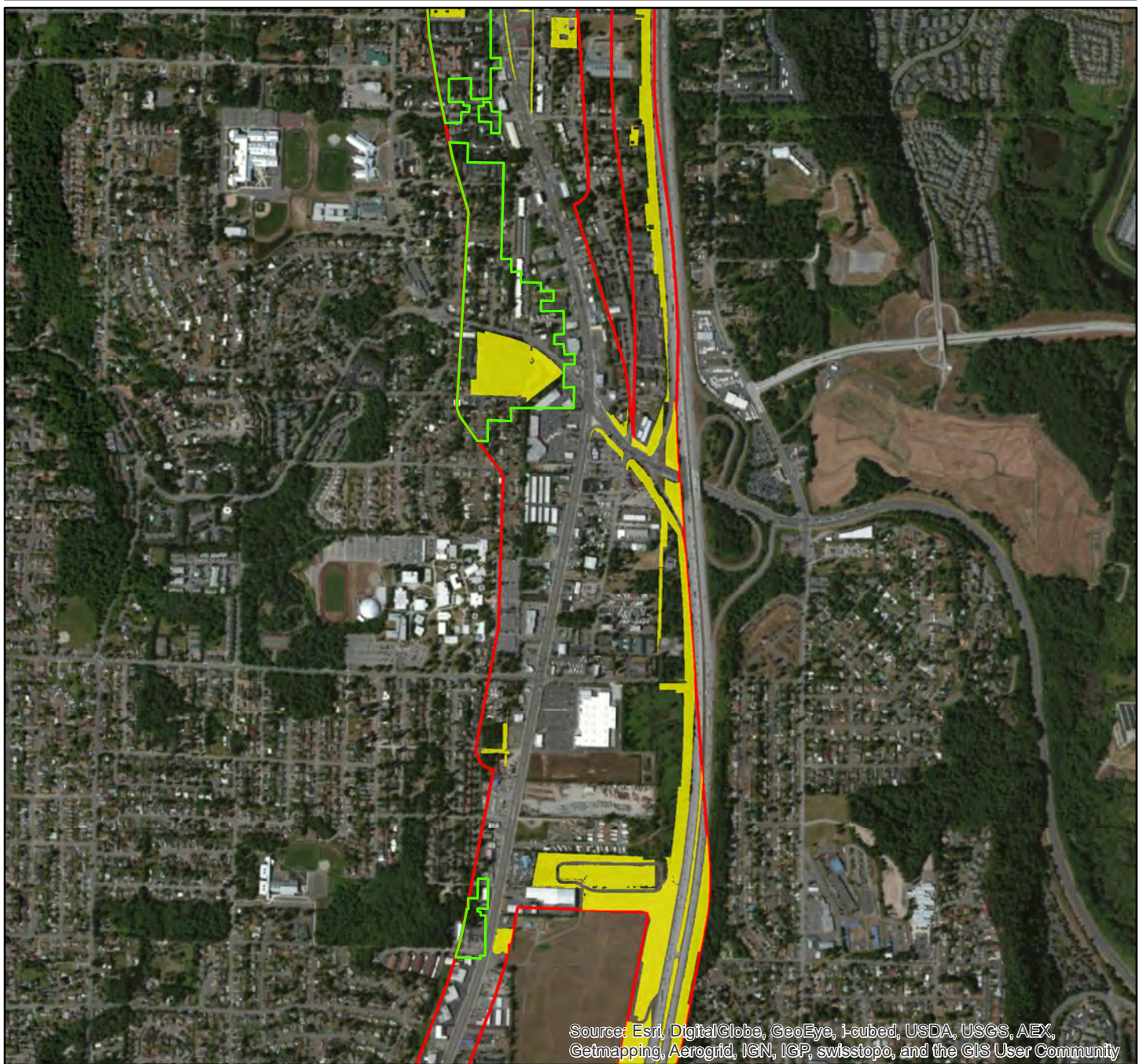


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



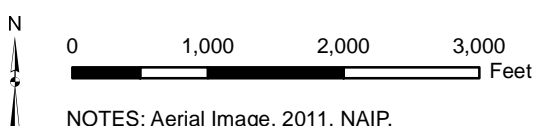
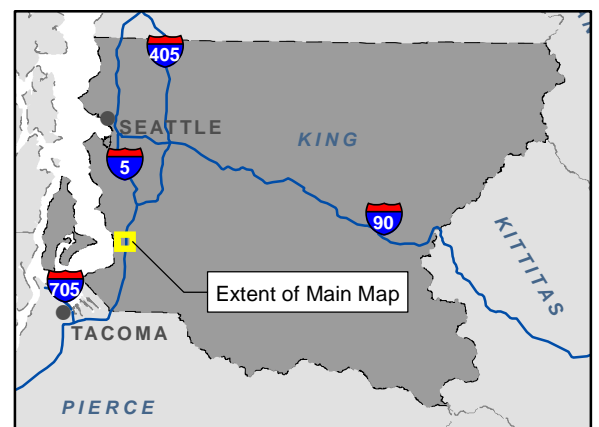
Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
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Sources:

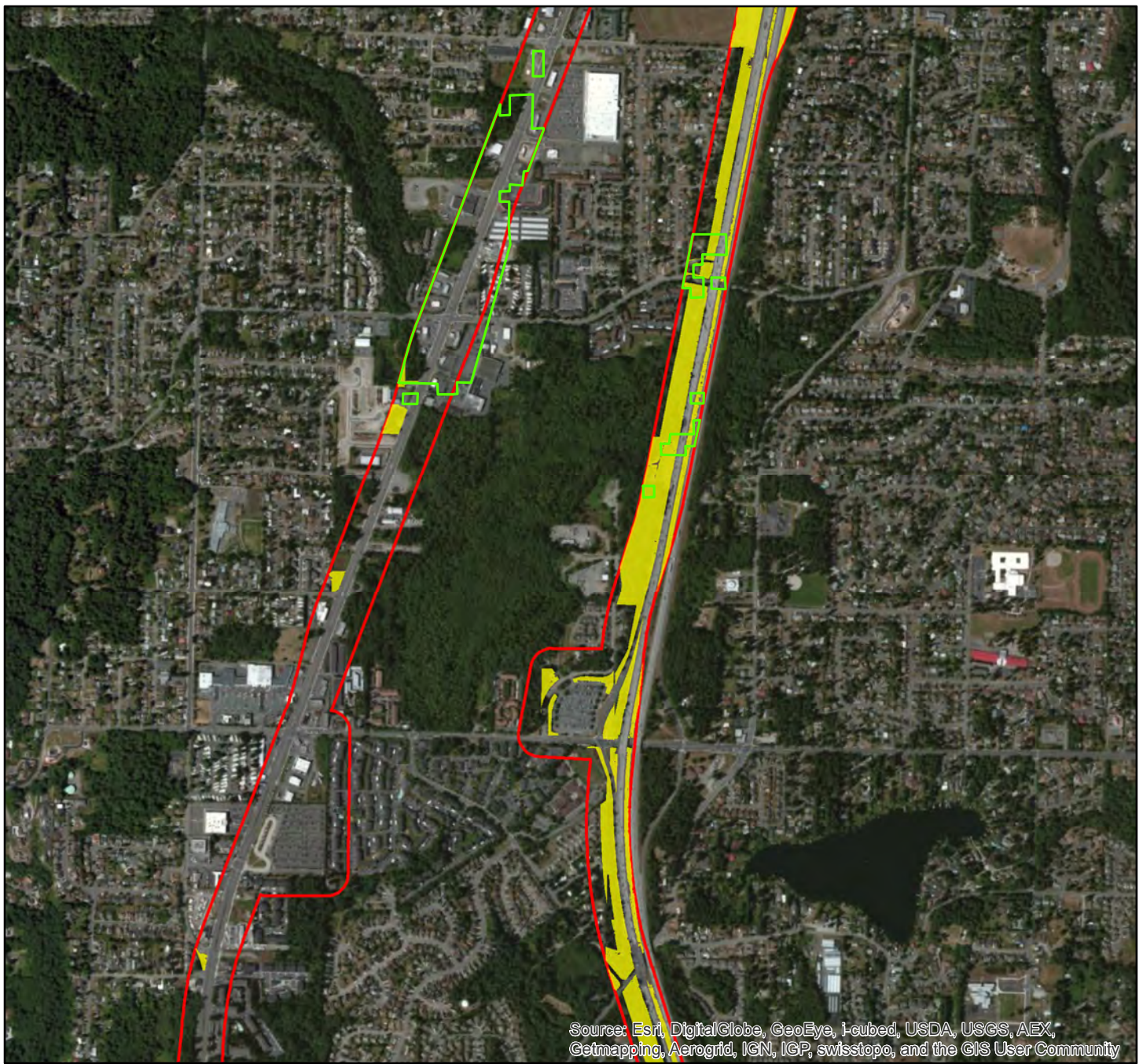
Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.

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NOTES: Aerial Image, 2011, NAIP.

FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



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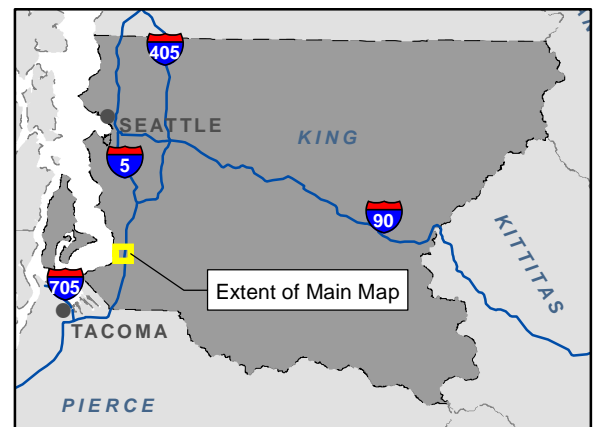
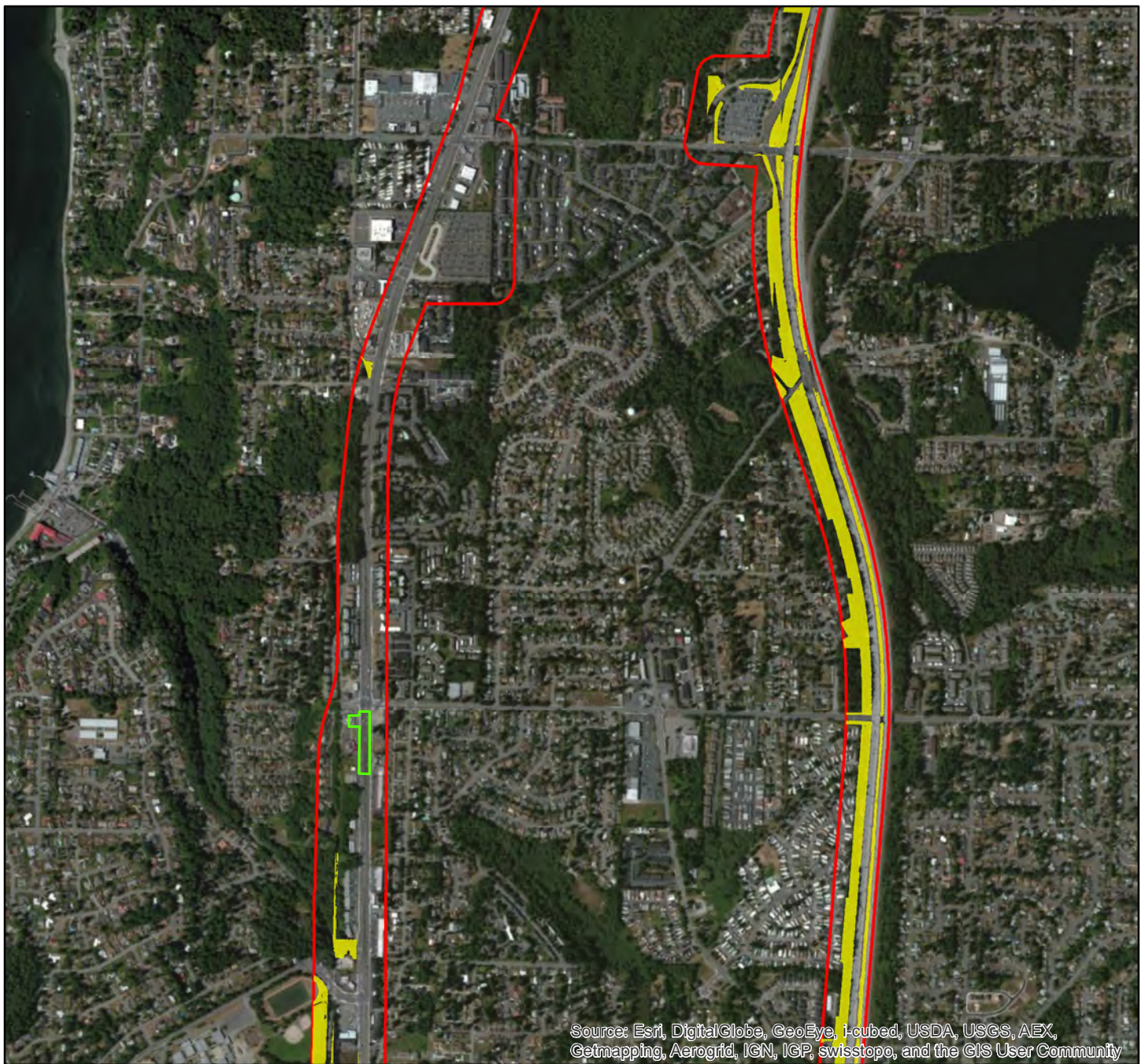


FIGURE 2
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 Federal Way Link Extension Project
 King County, WA



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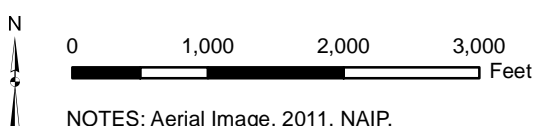
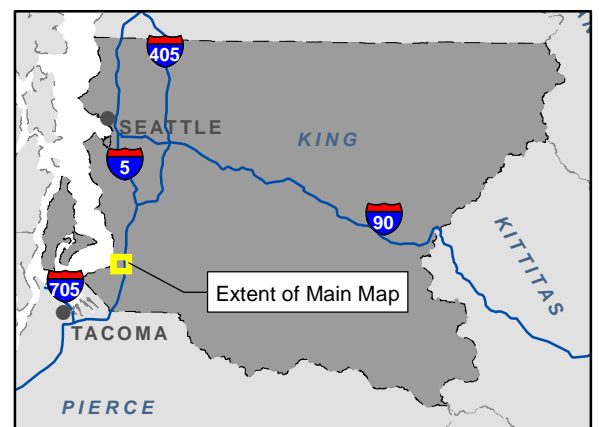


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 Federal Way Link Extension Project
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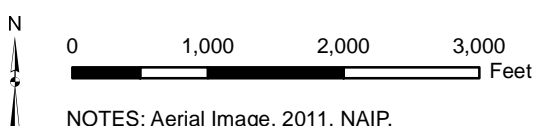
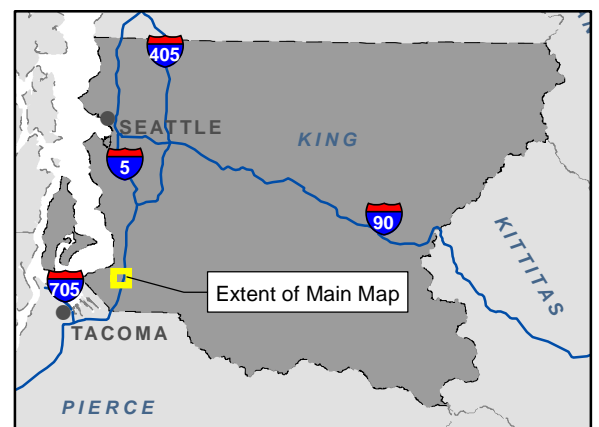


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA

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

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 2, 2014

Carolyn Lubenau
Tribal Chair
Snoqualmie Tribe
PO Box 969
Snoqualmie, WA 98065

**Re: Sound Transit Federal Way Link Extension
Area of Potential Effect & Archaeological Survey Plan**

The Honorable Carolyn Lubenau:

The Federal Transit Administration (FTA) initiated Section 106 consultation for the Sound Transit Federal Way Link Extension (FWLE), previously Federal Way Transit Extension, in June 2013. Since then, an area of potential effect (APE) and an archaeological survey plan have been developed for the project. The project and APE are described below. This letter invites your review and comments on the APE and the enclosed archaeological survey plan.

Project Description:

The FWLE Draft Environmental Impact Statement (EIS) will evaluate a set of light rail alignments and stations that would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. The alternatives to be evaluated in the Draft EIS are described below.

- **SR 99 Alternative:** The SR 99 alternative would consist of light rail guideway along the SR 99 median except for transitioning to the west side or east side of the roadway to access the three baseline stations at South Kent-Des Moines Road, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal Way Transit Center stations will be evaluated. The SR 99 alternative also includes additional station locations in the vicinities of South 216th Street and South 260th Street. An alignment option along the west side of SR 99 in Federal Way will also be evaluated.
- **I-5 Alternative:** The I-5 alternative consists of light rail guideway along the south side of the proposed SR 509 right-of-way (ROW) directly to I-5, then proceeding along the west side of the I-5 ROW. The guideway deviates west from the I-5 ROW near 317th Street to access the Federal Way Transit Center area. There would be three baseline stations at Kent-Des Moines, South 272nd Street, and the Federal Way Transit Center. Optional station locations for the Kent-Des Moines and Federal

Way Transit Center stations will be evaluated. Additionally an alignment option that transitions to the I-5 median to avoid the Midway Landfill is to be evaluated.

- SR 99/I-5 Alternative: The SR 99 to I-5 alternative would be the same as the SR 99 alternative till approximately Kent-Des Moines Road. Here it would transition to the I-5 corridor, with the Kent-Des Moines Station being located near 30th Avenue South, directly South of South 240th Street, this alternative would be the same as the I-5 alternative.
- I-5/SR 99 Alternative: The I-5 to SR 99 alternative would be the same as the I-5 alternative to approximately Kent-Des Moines Road, where it would transition to the SR 99 corridor, with the Kent-Des Moines Station located near 30th Avenue South, directly South of South 240th Street; this alternative would be the same as the SR 99 alternative.

Area of Potential Effect

The APE extends 200 feet from each side of the center of the guideway alignments. It also includes a radius of approximately 200 feet from the outer limits of station locations and ancillary facilities. Specific locations and footprints for the Kent-Des Moines station, and the Federal Way Transit Center station have not been finalized. In these areas the APE includes the entirety of the area between Kent-Des Moines Road, South 240th Street, SR 99, and I-5; and most of the area between South 312th Street and South 320th Street in Federal Way (see Figure 1, page 3 and Figure 2, page 5). Excluded from consideration is part of Steel Lake Park.

The APE also includes the areas where the project could directly disturb prehistoric and historic-period archaeological resources. Although the locations of project elements are not precisely known at this stage of the project, they are anticipated to be within the 200 foot buffer around the project elements described above. Details regarding the depth of construction will vary by alternative and will be developed as the project continues through project review and design.

We look forward to your comments on the APE and the archaeological survey plan. So that we may move forward with the archaeological investigations, we respectfully request that you provide any comments within 30 days.

If you have any questions or need further information, please feel free to contact Steve Saxton, FTA, at 206-220-4311 or james.saxton@dot.gov or Kent Hale, Sound Transit, at 206-395-5103 or kent.hale@soundtransit.org.

Sincerely,



R.F. Krochalis
Regional Administrator

Enclosures: Archaeological Survey Plan

cc: Steven Mullen Moses, Snoqualmie Tribe
Matthew Sterner, DAHP
Kent Hale, Sound Transit

March 2013

FEDERAL WAY LINK EXTENSION

Research Design for Archaeological Fieldwork Draft 1



CENTRAL PUGET SOUND
REGIONAL TRANSIT AUTHORITY

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Sound Transit Federal Way Link Extension

Research Design for Archaeological Fieldwork

Prepared by

Keith Mendez, M.A., CH2M HILL, Inc.

March 2014

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1.0 Introduction

The Federal Transit Authority (FTA) and Sound Transit have proposed the Federal Way Link Extension (FWLE) project to expand the Sound Transit Link light rail system from SeaTac to the cities of Des Moines, Kent, and Federal Way in King County. The proposed project would extend Link light rail transit service from the future Angle Lake Link light rail station at South 200th Street in SeaTac to the Federal Way Transit Center area in Federal Way. The project corridor is approximately 7.6 miles long and parallels State Route 99 (SR 99) and Interstate 5 (I-5). It generally follows a topographic ridge between Puget Sound and the Green River Valley where the city limits of SeaTac, Des Moines, Kent, and Federal Way meet. Sound Transit is preparing an environmental impact statement (EIS) in compliance with the National Environmental Policy Act and the Washington State Environmental Policy Act. The Draft EIS is expected to be published in late 2014 or early 2015. Following public and agency comments on the Draft EIS, the Sound Transit Board will identify a Preferred Alternative. The Final EIS will evaluate the Preferred Alternative further, and following publication of the Final EIS and issuance of the Record of Decision (ROD) by FTA, the Sound Transit Board will identify the project to be built. Final design and right-of-way acquisition will not occur until after the ROD and board decision.

Section 106 consultation was initiated with the Washington State Department of Archaeology and Historic Preservation (DAHP), the federally-recognized Muckleshoot, Puyallup, Snoqualmie, Stillaguamish, Suquamish, and Yakama tribes, and the non-federally recognized Duwamish and Snohomish tribes on June 13, 2013. DAHP concurred with the Area of Potential Effect (APE) notification on December 30, 2013. An archaeological survey will be employed to meet the reasonable and good faith effort identification requirements of Section 106 and the Washington State Standards for Cultural Resource Reporting. This document outlines the methodology that will be employed during this effort.

2.0 Project Location

Des Moines, WA / Poverty Bay, WA 7.5' USGS Quads
Township 21 N, Range 4 E
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3.0 Research Design

The archaeological survey is intended to gather information in two phases about the historic and pre-contact archaeological record. The purpose of the research design is to provide a methodology for conducting the survey, inventory, data collection, and report preparation.

The Phase I field work will include a reconnaissance level survey of the footprint of the design alternatives, and subsurface testing of areas of interest to identify archaeological sites. Phase II field work would include additional archaeological excavation that might be needed to evaluate properties for inclusion in the National Register of Historic Places if any such properties are identified during Phase I.

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The APE has been defined to include all design alternatives to be included in the Draft EIS (Figure 1). Impervious surface data were received from King County and overlaid on the APE to identify all portions of the APE that contain impervious surfaces such as roads, parking lots, or buildings. This information was examined to identify portions of the APE that could be inspected for the presence of historic properties (Figure 2). Out of a total APE containing 1,261 acres, impervious surfaces account for 565 acres. The remaining 696 acres include parcels in public and private ownership. This investigation examines only those parcels in public ownership that are not identified as impervious, which account for approximately 187.37 acres.

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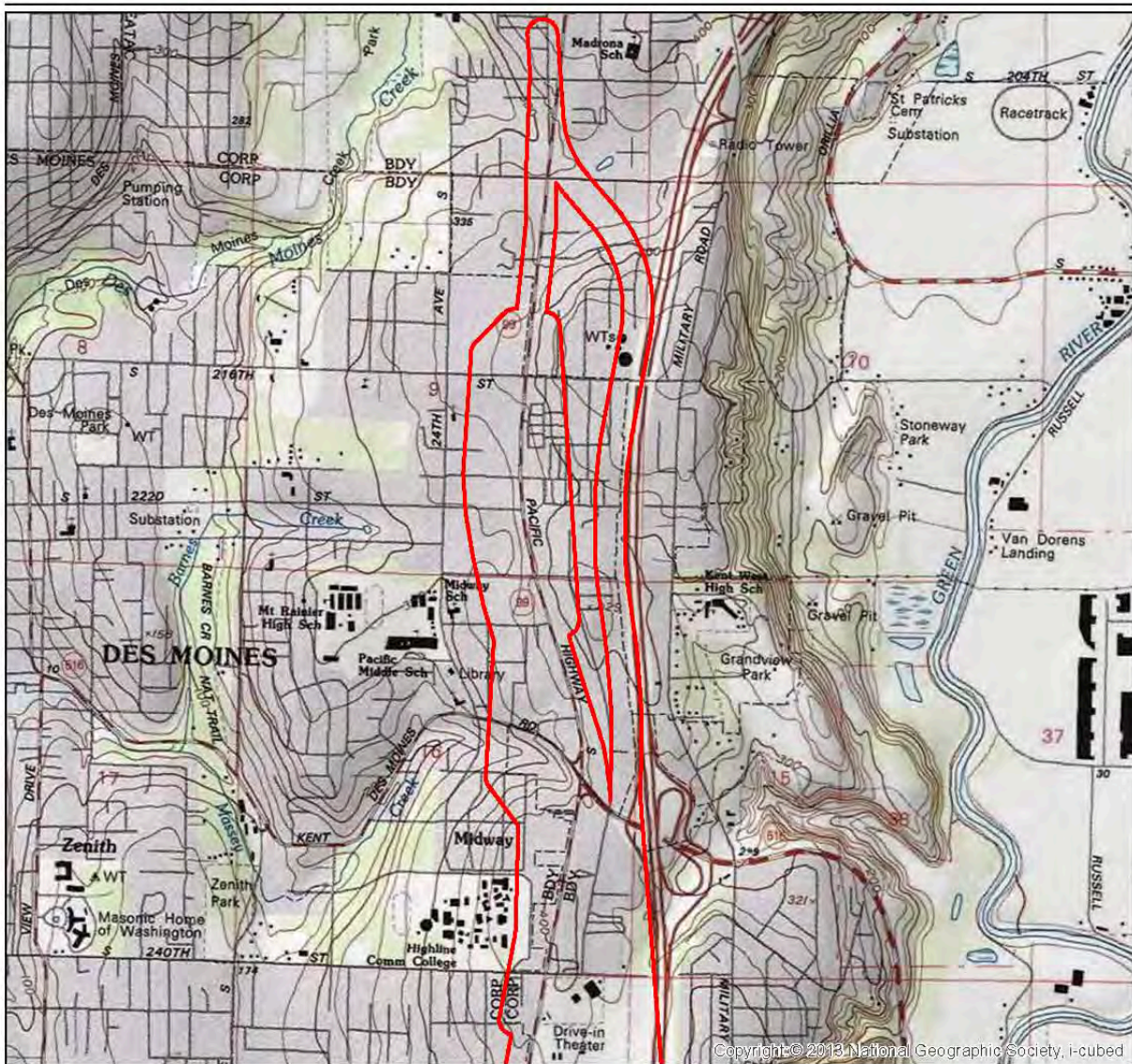
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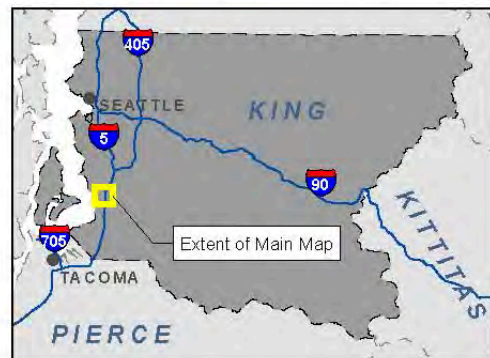
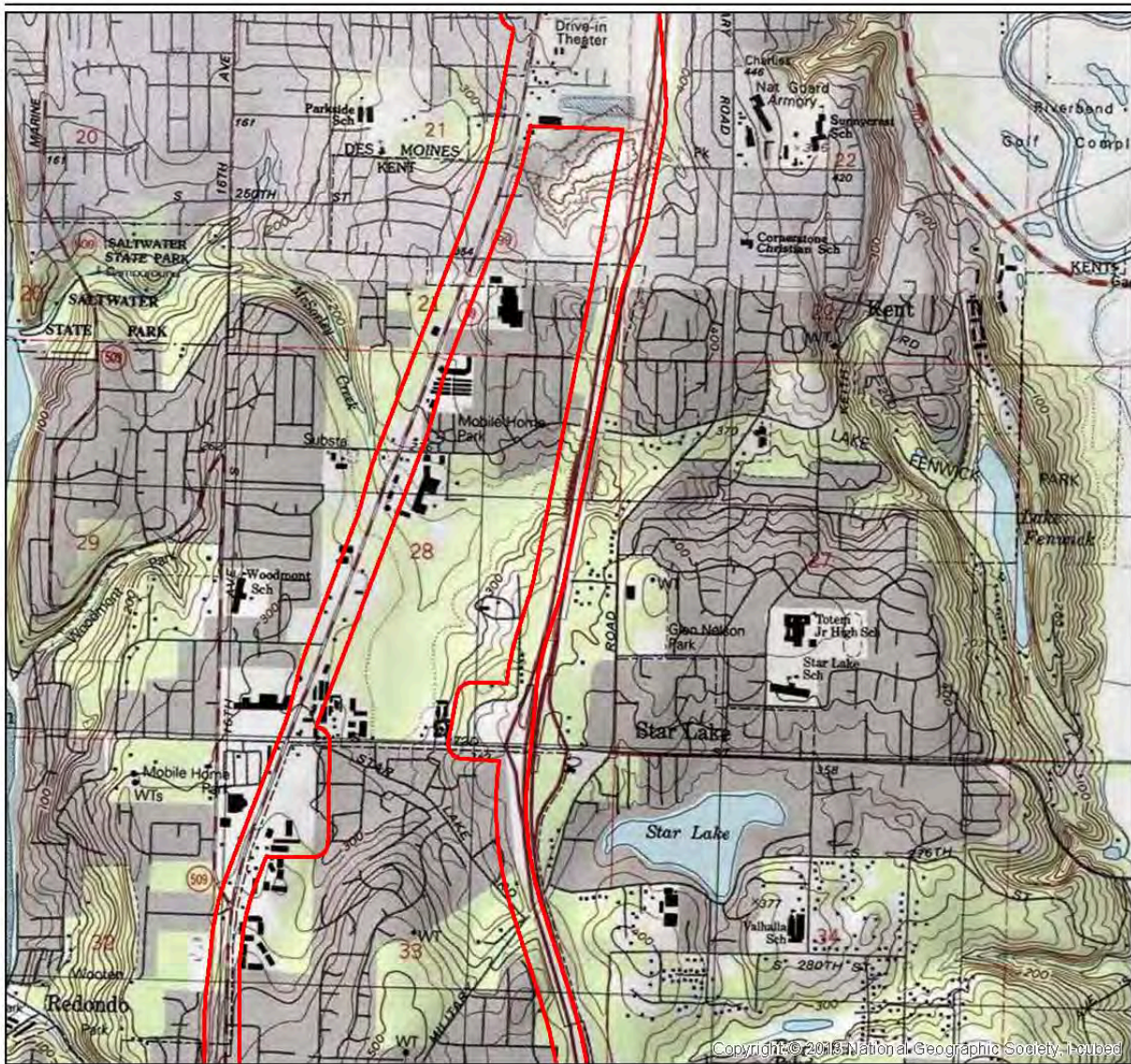


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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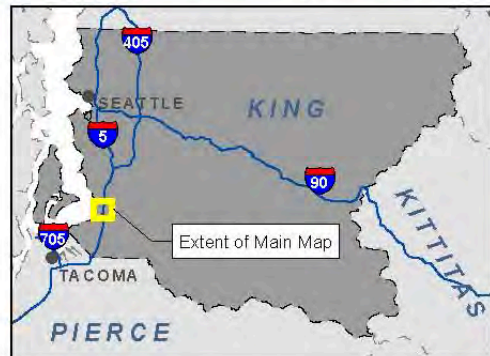
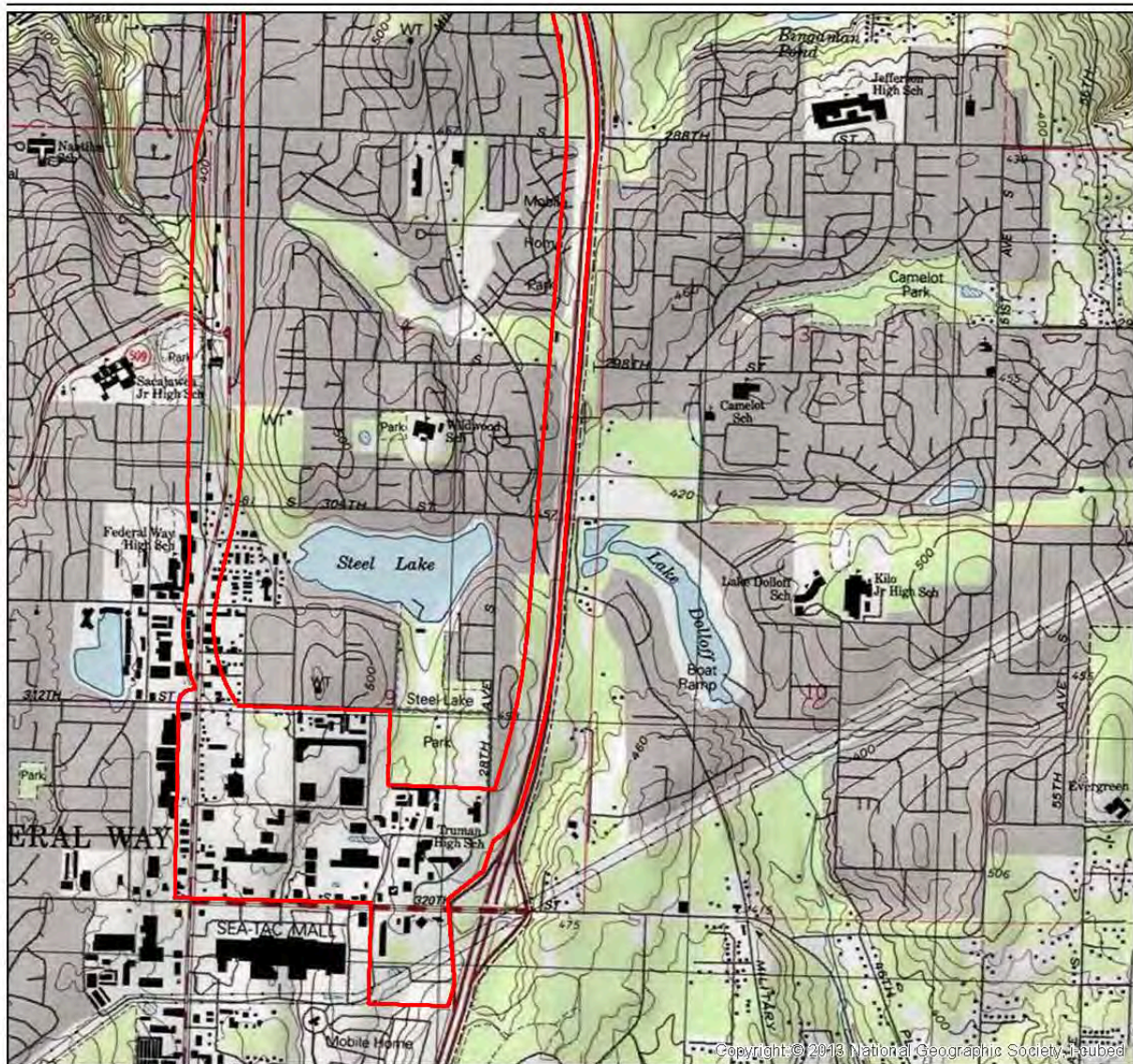


FIGURE 1
Area of Potential Effects (APE)

Federal Way Link Extension Project
 King County, WA



Legend

Area of Potential Effects (APE)

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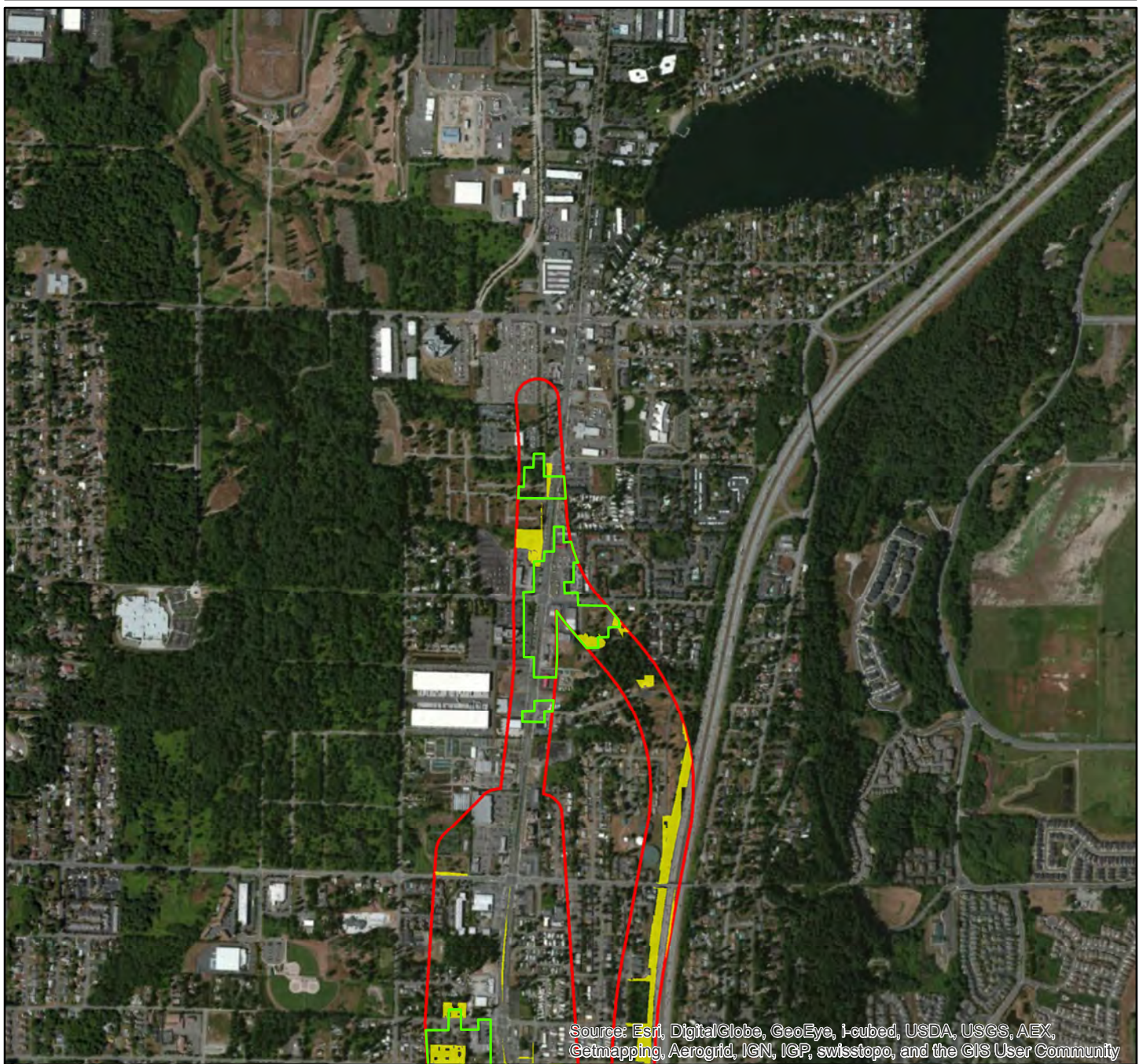


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Federal Way Link Extension Project
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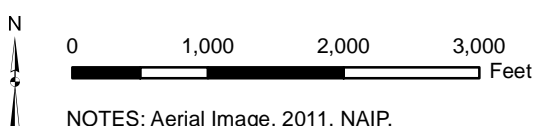
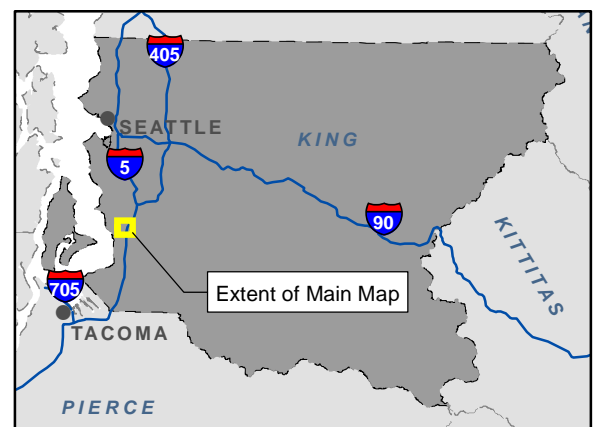
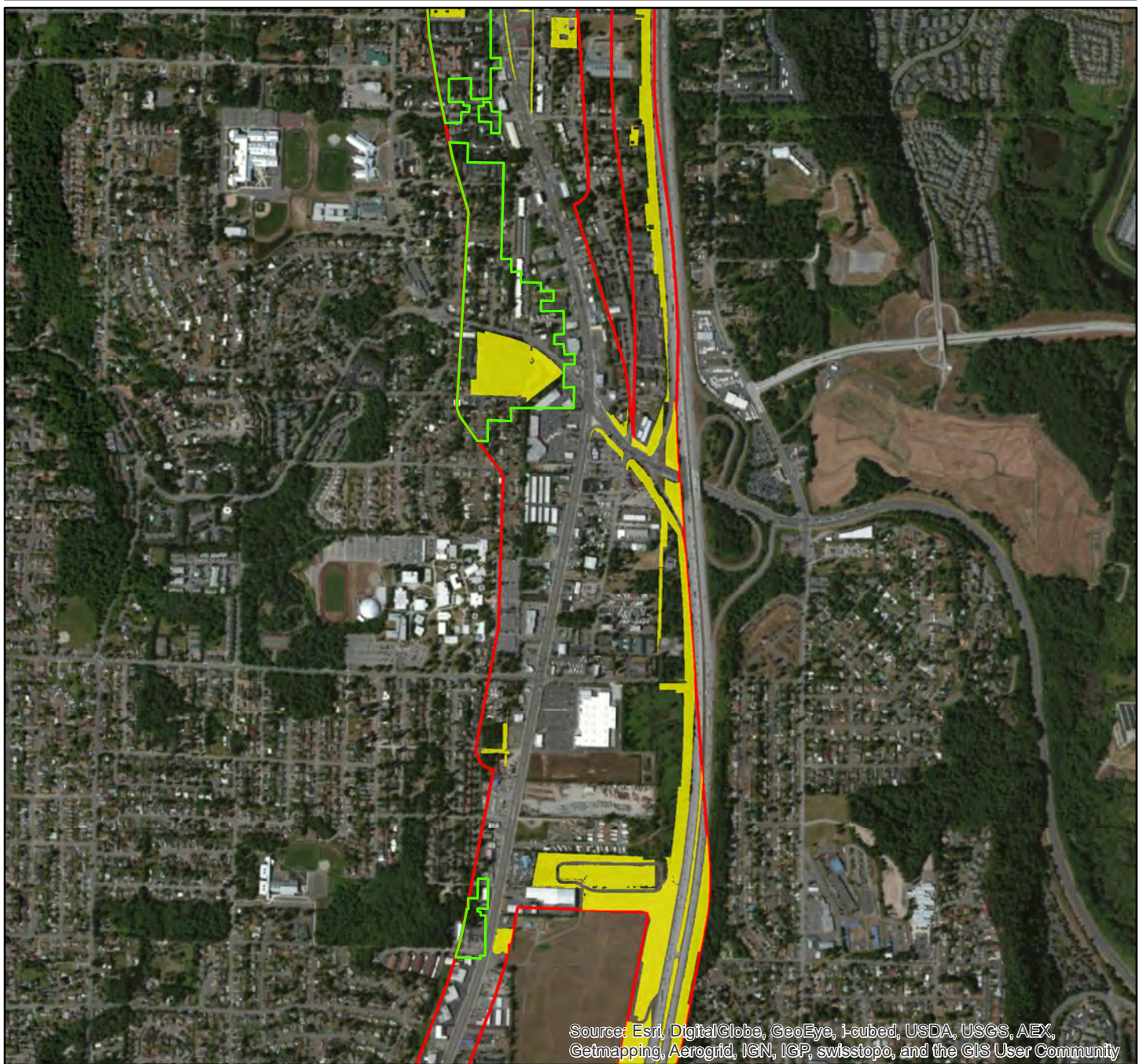


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
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Legend

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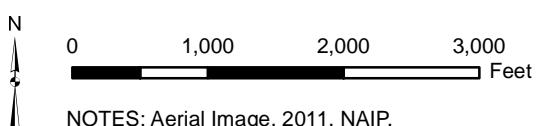
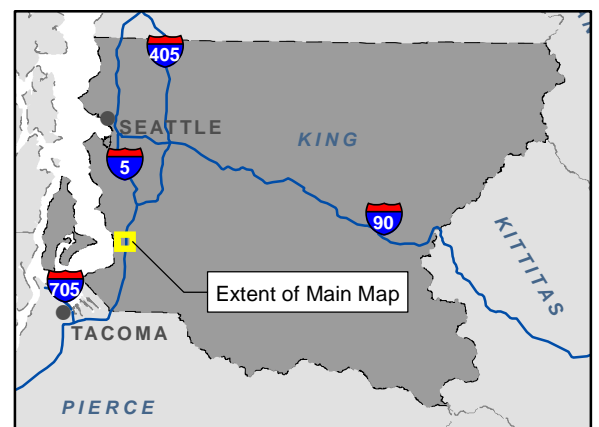
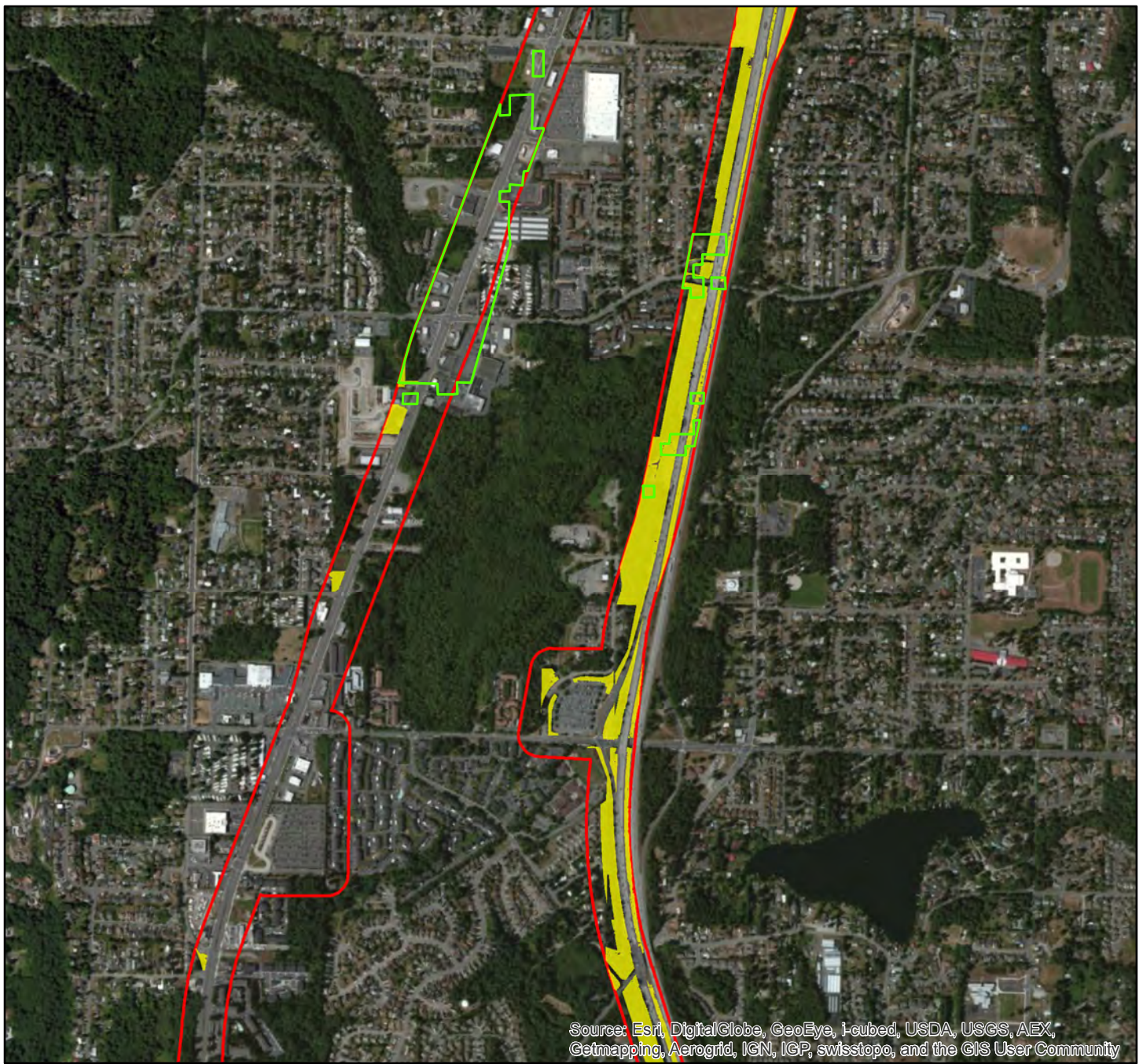


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
 Statewide Predictive Model: Environmental Factors with Archaeological Resources Results. Washington Information System for Architectural and Archaeological Records Data, Department of Archaeology and Historic Preservation. 2014.
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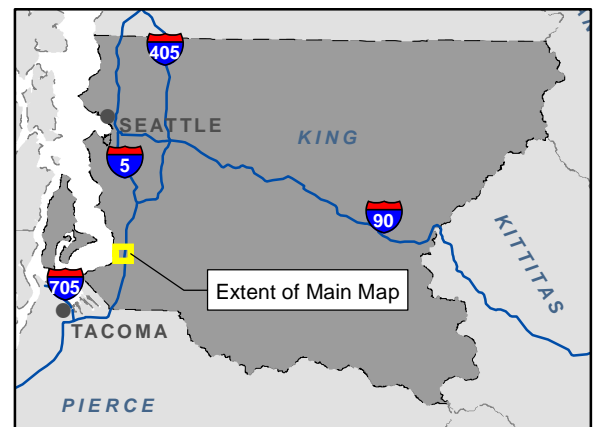
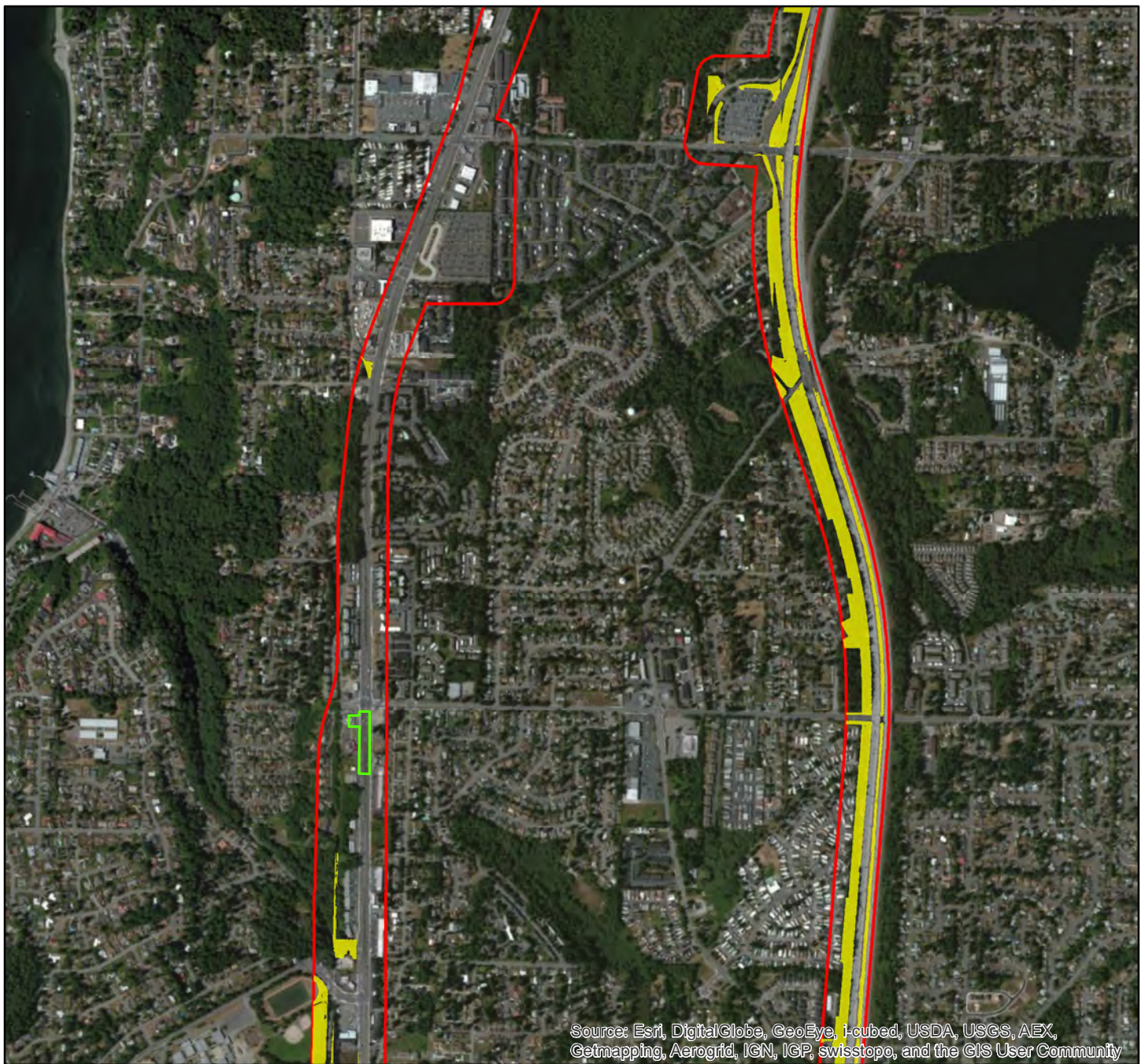


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
- Moderate To Very High Risk Cultural
- Public Lands, Non-Impervious

Sources:
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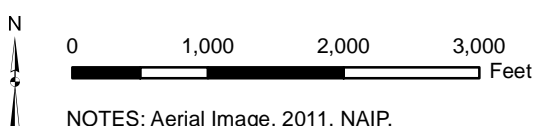
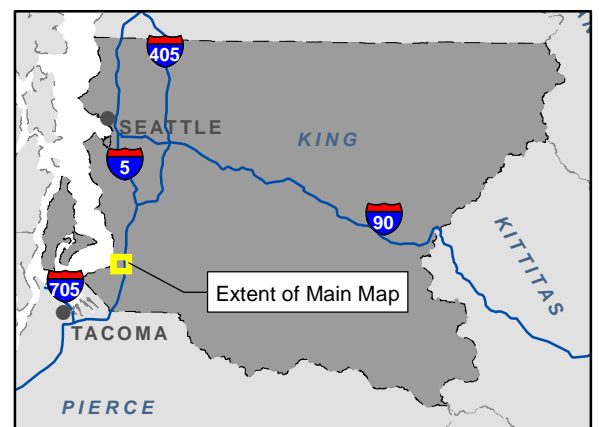


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA



Legend

- Area of Potential Effects (APE)
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- Public Lands, Non-Impervious

Sources:

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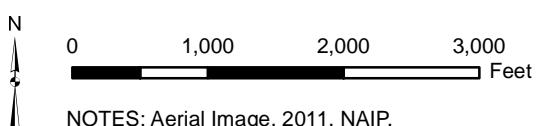
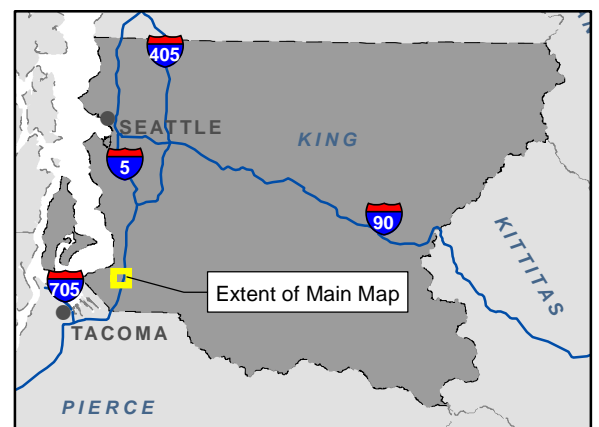


FIGURE 2
APE & Impervious Surface
 Federal Way Link Extension Project
 King County, WA

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U.S. Department
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**Federal Transit
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REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

April 28, 2014

Michael Houser
State Architectural Historian
Department of Archaeology and Historic Preservation
PO Box 148343
Olympia, WA 98504-8343

**Re: Sound Transit: Federal Way Link Extension
Log No. 102912-18-FTA
Highline Water District Property Eligibility Determination**

Dear Mr. Houser:

Thank you for reviewing the Historic Property Inventory (HPI) forms that FTA submitted for the Federal Way Link Extension (FWLE) project on February 20, 2014. An HPI form for the water tanks owned by the Highline Water District (King County District 75 Water Tanks) was included in the February submission. FTA determined that the Highline Water District property is not eligible for the National Register of Historic Places (NRHP); as you know, however, the Department of Archaeology and Historic Preservation (DAHP) disagreed with this finding on March 14, 2014.

In response to your invitation at a subsequent meeting, FTA submits the following additional information and discussion supporting our conclusion that the water tanks are not eligible.

Background

The Highline Water District property has four individual structures: two elevated water towers, and two ground-level tanks. The FWLE I-5 Alternative would necessarily remove the largest ground-level water tank. The tank would likely be replaced elsewhere on the same property to provide an up-to-date and functionally equivalent water storage structure. The other three structures would not be physically impacted by the I-5 Alternative.

Previous Documentation

DAHP's database includes HPI forms for the two elevated water towers from December 2012, under a survey entitled "Mansion Hill SE73XC001 cellular." These forms (attached for your

convenience) were prepared by a cellular telephone company for the Federal Communications Commission (FCC). The FCC documentation states that “the water tower[s] retains sufficient integrity to be potentially eligible for the NRHP under Criterion C.” However, the HPI addresses only the structures’ integrity and does not describe how or even which part of Criterion C the elevated water towers meet. The HPI form does not explain the structures’ significance and provides no historic context in which to consider any potential significance. DAHP concurred with the determination of potential eligibility in January 2013.

Criterion C Requirements and Guidance

You are deeply knowledgeable about the regulatory requirements surrounding Criterion C, but the brief summary below provides helpful context for the water tower discussion.

Criterion C states that the quality of significance in American history is present in structures that possess integrity and that “embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.” 36 CFR 60.4(c).

The National Park Service’s Bulletin 15 provides guidance on how to apply the criteria for NRHP eligibility evaluations. Bulletin 15 makes clear that eligible properties (under any criteria) must be significant and must be evaluated within their historic context: “To qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area....The significance of a historic property can be judged and explained only when it is evaluated within its historic context” (pg. 7). With respect to Criterion C specifically (discussed at pp. 17-20), it states:

- “This criterion applies to properties *significant for their physical design or construction...*” [emphasis added].
- “A structure is eligible as a specimen of its type or period of construction if it is *an important example (within its context)* of building practices of a particular time in history” [emphasis added].
- “[T]he first requirement, that properties ‘embody the distinctive characteristics of a type, period, or method of construction,’ refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. ... To be eligible under this portion of the Criterion, a property must clearly illustrate, through ‘distinctive characteristics,’ the following:
 - The pattern of features common to a particular class of resources,
 - The individuality or variation of features that occurs within the class,
 - The evolution of that class, or
 - The transition between classes of resources.”

- “A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; *it must be demonstrated to be significant as well*” [emphasis added].

FWLE Evaluation

In accordance with 36 CFR 800.4(c)(1), which allows an agency official to reevaluate properties previously determined eligible for the NRHP due to “incomplete prior evaluations,” FTA submitted an HPI form addressing all four structures on the Highline Water District property. The FWLE HPI form recognized that the tanks retain integrity but also addressed Criterion C’s other requirements for finding eligibility, concluding:

The property is not eligible for the NRHP under Criterion C as it contains typical elevated water towers and ground level tanks that lack any distinguishing features and do not embody the distinctive characteristics of a type, period, or method of construction; they are not the work of a master and do not possess high artistic value. Many water storage structures in the United States have been recognized for their architectural significance and unique designs, but these four structures are unremarkable and thousands of similar ones exist throughout the country. In addition, the Highline Water District itself has nine similar water storage structures, so these four are not unique to the area. . .

In other words, the water tank lacks significance not only because there are thousands of similar structures, but because “it lacks any distinguishing features” and “does not embody the distinctive features of a type, period, or method of construction.”

- It is not clear what “pattern of features” is particular to this class of resources, and the 2012 HPI form did not identify any. Brief research conducted by Sound Transit’s historic preservation professionals found no discernible pattern. The Highline water tanks are devoid of stylistic architectural features or unique engineering qualities, so the patterns normally discussed under this criteria do not apply.
- The 2012 HPI form also failed to identify any distinctive characteristics that water tanks might possess which could convey the design or fabrication of earlier people. Some water towers are elevated, some are not; most are oval or round in shape with a top that is curved to shed water; they are constructed primarily of metal, but sometimes wood; some sit on multiple pilings while some have only a single pylon. In summary, they are typical, unremarkable examples of simple, utilitarian structures. There is also no distinct individuality or variation of features within the class, and the property in question does not demonstrate any evolution or transition.
- The 2012 HPI form gave no historic context for evaluating significance. Context is critical for determining whether the water tower is an important example (as opposed to just a typical example). As described above, an eligibility finding requires that a building be an important (not just typical) example within its context. The FWLE HPI form includes context for both the development of the community and the history of the

Highline Water District and, as noted, finds the structures are not significant elements within that context.

Conclusion

While the water tank retains integrity and may be representative of its period, FTA finds that the available information (including the 2012 HPI form) does not allow us to conclude that it is significant in terms of NRHP criteria. FTA therefore invites DAHP to reconsider its determination that the Highline Water District property is eligible for the NRHP. If DAHP continues to find the property significant, we would like to request a meeting to discuss next steps.

Please contact Steve Saxton (FTA) at 206-220-4311 or james.saxton@dot.gov or Kent Hale (Sound Transit) at 206-398-5103 or Kent.Hale@soundtransit.org if you have any questions. Thank you for your assistance.

Sincerely,



Kenneth A. Feldman
Deputy Regional Administrator

cc (by email): Kent Hale, Sound Transit

July 3, 2014

Mr. Steve Saxton
Federal Transit Administration
915 2nd Avenue
Federal Building, Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:
Log: 102912-18-FTA
Property: Federal Way Link Transit Extension
Re: Highline Water District – Water Tanks

Dear Mr. Saxton:

Thank you for contacting our office. I have carefully reviewed the additional materials you provided to our office for the various water tanks associated with the Highline Water District. Thank you for sending those. This resource includes four individual objects: two elevated water towers and two ground level water towers. The collection of object was recorded on one HPIF.

After consulting with other colleagues in the office and other SHPO's across the county, I stand by my initial assessment that the towers are ELIGIBLE for listing on the National Register of Historic Places. The towers are significant under criteria C as resources that *"embody the distinguishing characteristics of their type and period of construction"*. The collection of towers were built by the Horton Tank Co., a subsidiary of the Chicago Bridge & Iron Company; proprietors, engineers and erectors of water towers, standpipes, oil tanks, gas holders, and smoke stacks. This company is an international business who's products have a have a deep and long-lasting impact on the development of countless communities across the US. Additionally their projects have added in the growth of thousands of business and military bases across the globe. The collection of tanks in Highline, represents a collection of several types and models of tanks, thus demonstrating in one location, characteristics of water tanks over a period of time.

Additionally, the water tanks are eligible under criteria A for their direct contribution to the broad patterns of growth and development of the Highline community. Without such tanks, the community would not have been able to establish itself, nor growth beyond the initial aspirations of the communities founders.

Keep in mind that this determination does not stop the plans of the Sound Transit Light Rail system. Under Section 106, the review is a process which requires consultation and mitigation when eligible resources are effected with the simple idea of being good stewards of cultural resources.

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

Sincerely,



Michael Houser
State Architectural Historian
(360) 586-3076 michael.houser@dahp.wa.gov



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

August 18, 2014

Mr. Steve Saxton
Federal Transit Administration
915 2nd Avenue
Federal Building, Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:
Log: 102912-18-FTA
Property: Federal Way Link Transit Extension
Re: Highline Water District Clarification

Dear Mr. Saxton:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The Federal Way Link Transit Extension has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

In our continuing discussion regarding the water features associated with the Highline Water District (one elevated tower constructed in 1950, one elevated tower constructed in 1962, one ground-level tank constructed in 1959, and one ground-level tank constructed in 1968), DAHP has reconsidered its National Register of Historic Places eligibility evaluation of this group of features. While the two elevated towers and the 1959 ground-level tank may be eligible for listing in the National Register of Historic Places (NRHP), the analysis of the water system in terms of the development of Highline is completely lacking. In the absence of a developed context describing the relationship of the water retention features to the Highline community, we should not consider the features as a cohesive group.

Additionally, Criterion C needs to be expanded to discuss the water towers and tanks as examples of a type. cursory research into the history of the Chicago Bridge and Iron Co., and their subsidiary the Horton Tank Company, indicates that the company built over 25,000 of these things so a property type could be established. It may have already been established as part of other context statements or nominations but neither the HPI nor anyone's letters detailed this information. Thus, we cannot find these individually eligible but they may be contributing features of either the water system district, or a larger residential district that may have not been surveyed. In any case, the information has not been presented to make a definitive decision.

In any case, we cannot find any justification to determine the 1968 ground-level water tank eligible for listing in the NRHP. It does not meet the 50-year timeline, would not be individually eligible, and does not meet the criteria of exceptional significance. A possible solution to the issue may require a re-evaluation of the area of potential effects (APE) for this alternative, narrowing the APE to include only structures that will be physically impacted or removed as a



result of the project. If the remaining three water features will be avoided by physical impacts resulting from the undertaking, their NRHP eligibility evaluation can be revisited in the future.

We look forward to continuing consultation on this issue. If you have any questions or require clarification of any kind, please don't hesitate to contact me.

Thank you for the opportunity to review and comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Sterner", followed by a long horizontal flourish.

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

Cc: Dan Drais, FTA





U.S. Department
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REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

August 29, 2014

Matthew Sterner
State Historic Preservation Officer
Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Re: Sound Transit Federal Way Link Extension
DAHP Log: 102912-18-FTA Preliminary Draft Historic and Archaeological Technical Report

Dear Mr. Sterner:

The Federal Transit Administration (FTA) and Sound Transit are preparing environmental documentation for the Federal Way Link Extension (FWLE), which extends light rail from SeaTac to Federal Way in King County, Washington. FTA initiated Section 106 consultation on the project in June 2013 and the Department of Archaeology and Historic Preservation (DAHP) concurred with the area of potential effect (APE) in December 2013. FTA and Sound Transit are now developing the Draft Environmental Impact Statement (DEIS) for the project.

In accordance with Section 106 of the National Historic Preservation Act and as a part of our continuing consultation, FTA is submitting the preliminary Draft Historic and Archaeological Resources Technical Report for the Draft EIS for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments on the preliminary Draft Historic and Archaeological Resources Technical Report are requested by September 29, 2014. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosure: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft EIS Executive Summary with CD

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206-220-7959 (fax)

August 29, 2014

Virginia Cross
Tribal Chair
Muckleshoot Indian Tribe
39015 172nd Ave SE
Auburn, WA 98092

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Virginia Cross:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Karen Walter, Natural Resources, Muckleshoot Indian Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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206-220-7954
206-220-7959 (fax)

August 29, 2014

Bill Sterud
Tribal Chair
Puyallup Tribe of Indians
3009 Portland Ave
Tacoma, WA 98404

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Bill Sterud:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Brandon Reynon, Cultural Resources, Puyallup Tribe
Bill Sullivan, Natural Resources, Puyallup Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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206-220-7959 (fax)

August 29, 2014

Carolyn Lubenau
Tribal Chair
Snoqualmie Indian Tribe
PO Box 969
Snoqualmie, WA 98065

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Carolyn Lubenau:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

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Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Steven Mullen-Moses, Cultural Resources, Snoqualmie Indian Tribe
Cindy Spiry, Natural Resources, Snoqualmie Indian Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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

August 29, 2014

Shawn Yanity
Tribal Chair
Stillaguamish Tribe of Indians
PO Box 277
Arlington, WA 98223

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Shawn Yanity:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Historic and Archaeological Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: John Miller, Cultural Resources, Stillaguamish Tribe
Pat Stevenson, Natural Resources, Stillaguamish Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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206-220-7954
206-220-7959 (fax)

August 29, 2014

Leonard Forsman
Tribal Chair
Suquamish Tribe
PO Box 498
Suquamish, WA 98392

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable Leonard Forsman:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

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Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Dennis Lewarch, Cultural Resources, Suquamish Tribe
Alison O'Sullivan, Natural Resources, Suquamish Tribe
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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206-220-7954
206-220-7959 (fax)

August 29, 2014

JoDe Goudy
Tribal Chair
Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948

**Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological and Ecosystems Technical Reports**

The Honorable JoDe Goudy:

In a letter dated June 11, 2013, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Federal Way Link Extension. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2014 FTA invited the tribe's comments on the APE and the archaeological survey plan.

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Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or james.saxton@dot.gov or Kent Hale, Sound Transit, at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosures: Preliminary Draft Historic and Archaeological Technical Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

cc: Johnson Meninick, Cultural Resources, Yakama Nation
Phillip Rigdon, Natural Resources, Yakama Nation
Matthew Sterner, Department of Archaeology and Historic Preservation
Kent Hale, Sound Transit

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August 29, 2014

Cecile A. Hansen, Tribal Chair
Duwamish Tribe
4705 W Marginal Way SW
Seattle, WA 98106

Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological Resources and Ecosystems
Technical Reports

Dear Chair Evans:

Sound Transit initiated consultation Snohomish Tribe in June 2013 for preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Link Extension project, pursuant to the National Environmental Policy Act (NEPA). Since the initiation of consultation, Sound Transit has identified alternatives for study in the EIS and developed a proposed Area of Potential Effect (APE) for the project. In March 2014 Sound Transit invited the tribe's comments on the APE and the archaeological survey plan.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, we are submitting to you for review and comment the preliminary Draft Historic and Archaeological Resources Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. An executive summary of the preliminary Draft EIS, also included, describes the project background and alternatives evaluated. Finally, a CD with the entire Draft EIS is included with the Executive Summary.

Your comments are requested by September 29, 2014. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact me at (206) 398-5103 or at kent.hale@soundtransit.org.

Sincerely,

Kent Hale
Environmental Planner

Enclosures: Preliminary Draft Historic and Archaeological Resources Technical
Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

Cc: Steve Saxton, Federal Transit Administration
(via e-mail) Matthew Sterner, Department of Archaeology and Historic Preservation

Central Puget Sound Regional Transit Authority • Union Station
401 S. Jackson St., Seattle, WA 98104-2826 • Reception: (206) 398-5000 • FAX: (206) 398-5499
www.soundtransit.org

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CHIEF EXECUTIVE OFFICER

Joni Earl

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August 29, 2014

Michael Evans, Tribal Chair
Snohomish Tribe
11014 19th Ave SE Ste#8, PMB #101
Everett, WA 98208

Re: Sound Transit Federal Way Link Extension
Preliminary Draft Historic and Archaeological Resources and Ecosystems
Technical Reports

Dear Chair Evans:

Sound Transit initiated consultation Snohomish Tribe in June 2013 for preparation of an Environmental Impact Statement (EIS) for the proposed Federal Way Link Extension project, pursuant to the National Environmental Policy Act (NEPA). Since the initiation of consultation, Sound Transit has identified alternatives for study in the EIS and developed a proposed Area of Potential Effect (APE) for the project. In March 2014 Sound Transit invited the tribe's comments on the APE and the archaeological survey plan.

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Sincerely,

Kent Hale
Environmental Planner

Enclosures: Preliminary Draft Historic and Archaeological Resources Technical
Report
Preliminary Draft Ecosystems Technical Report
Preliminary Draft EIS Executive Summary with CD

Cc: Steve Saxton, Federal Transit Administration
(via e-mail) Matthew Sterner, Department of Archaeology and Historic Preservation

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*Washington State Secretary of
Transportation*

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King County Council Chair

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King County Councilmember

Peter von Reichbauer
King County Councilmember

CHIEF EXECUTIVE OFFICER

Joni Earl

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October 2, 2014

Mr. Richard F. Krochalis
Regional Administrator
Federal Transit Administration
915 Second Avenue
Federal Building, Suite 3142
Seattle, Washington 98174-1002

Attn: Steve Saxton

In future correspondence please refer to:

Log: 102912-18-FTA

Property: Federal Way Link Transit Extension

Re: Historic Property Inventory Forms – Batch 2

Dear Mr. Krochalis:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced property has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

The table attached to your correspondence contains determinations of eligibility on (384) properties that have not previously been evaluated. However, (8) additional properties were submitted to HPI that are not accounted for in the table. These (8) properties have been evaluated, as well. Of the (392) new HPI forms submitted, we concur that (386) are ineligible for inclusion on the National Register under Criterion C. However, we cannot concur with your determination that the following (6) properties are ineligible for the National Register without further evaluation:

- 1436 S 312th St, Federal Way (US Bank)
- 23226 30th Ave S, Des Moines (King's Arms Motel)
- 23418 Pacific Hwy S, Kent (Dollar Tree)
- 23616 Pacific Hwy S, Kent (Midway Moto Sports Auto Sales)
- 28631 Pacific Hwy S, Federal Way (J n B Furniture)
- 23454 30th Ave S, Kent (Life Saver) – not included on table

Please submit a more in-depth evaluation of the architectural significance of each of the abovementioned properties under Criterion C. The only evaluation of architectural significance for each of these properties submitted to HPI is a boilerplate statements that read: *"The property is not eligible for the NRHP under Criterion C as it contains typical mid-twentieth century commercial retail buildings and does not embody the distinctive characteristics of a type, period, or method of construction; it is not the work of a master and does not possess high artistic*

value." This overly generic statement is not a fair evaluation of these properties, and should be expanded upon.

Though typical to the mid-twentieth century, architectural features on the abovementioned properties appear to be distinctive characteristics that are contrary to your evaluation. To say that a property is not eligible under Criterion C *because* it contains typical features of a particular era is antithetical to the notion that a historic property should convey its architectural significance through features that characterize a particular era, type of building, or style. We recommend additional research and consultation with subject matter experts such as the Society for Commercial Archaeology in order to adequately evaluate these properties' architectural significance within the context of mid-century modern architecture. You might also consider consulting with or using research tools developed by CalTrans on appropriate evaluation of mid-century modern resources.

We look forward to evaluating the individual resources located at the Highline Water District, and to receiving the additional requested information regarding the (6) properties above in order to complete our evaluation. Thank you for the opportunity to review and comment. Should you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nick Vann".

Nicholas Vann, AIA
Historical Architect
(360) 586-3079
Nicholas.Vann@dahp.wa.gov



Hale, Kent

From: james.saxton@dot.gov
Sent: Thursday, November 20, 2014 2:25 PM
To: matthew.sterner@dahp.wa.gov
Cc: daniel.drais@dot.gov; Hale, Kent; Green, Erin; fta.tro10mail@dot.gov
Subject: O - Sound Transit Federal Way Link Extension, Log No. 102912-18-FTA, Addiitonal Information
Attachments: FWLE Combined Revised HPI Forms 10-27-14.pdf

Matthew,

FTA submitted HPI forms to DAHP on February 20th and August 28th, 2014 for the Federal Way Link Extension (FWLE). In the August 18, 2014 letter, DAHP noted that additional information is needed on the King County District 75 water tanks and that the four tanks should be evaluated separately. DAHP also requested additional information in the October 2, 2014 letter on the following six properties:

- 436 S 312th St, Federal Way (US Bank)
- 23226 30th Ave S, Des Moines (King's Arms Motel)
- 23418 Pacific Hwy S, Kent (Dollar Tree)
- 23616 Pacific Hwy S, Kent (Midway Moto Sports Auto Sales)
- 28631 Pacific Hwy S, Federal Way (J n B Furniture)
- 23454 30th Ave S, Kent (Life Saver)

To address DAHP's request, revised HPI forms have been prepared. Four new forms for each of the water tanks have been submitted in WISAARD. Updated HPI forms for the six other properties have also been submitted in WISAARD and are linked to the forms previously submitted in August.

Based on the information included in the HPI forms, none of the properties meet the National Register criteria. Therefore, FTA requests your concurrence with the finding that all ten properties are not eligible for listing in the National Register of Historic Places.

Please contact Steve Saxton (FTA) at 206-220-4311 or james.saxton@dot.gov or Kent Hale (Sound Transit) at 206-398-5103 or Kent.Hale@soundtransit.org if you have any questions. Thank you for your assistance.

Steve Saxton
FTA, Region 10
206-220-4311

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

December 24, 2014

Mr. Richard F. Krochalis
Federal Transit Administration
915 Second Avenue
Federal Building, Suite 3142
Seattle, Washington 98174-1002

In future correspondence please refer to:

Log: 102912-18-FTA

Property: Federal Way Link Transit Extension

Re: Re-Evaluation of Cultural Resources Report, Determined Eligible

Dear Mr. Krochalis:

As a result of comments made during a recent meeting between the Department of Archaeology and Historic Preservation (DAHP), the Federal Transit Administration (FTA), and Sound Transit, I am drafting this letter to clarify DAHP's progress in the Section 106 review of the Federal Way Link Transit Extension project. Based upon ongoing discussions and evaluations following the submittal of the Historic and Archaeological Technical Report to DAHP in August of this year, to date, DAHP believes the following historic properties that fall within the area of potential effect (APE) for the project are eligible for listing in the National Register of Historic Places (NRHP):

- the US Bank Building located at 1436 S 312th St., Federal Way,
- five structures associated with the Highline Community College, 2400 S 240th St, Des Moines, and
- the Calvary Lutheran Church located at 2415 S 320th St., Federal Way.

DAHP feels that the four water storage tanks located at 21420 31st Ave S, SeaTac, part of the Highline Water District, are not eligible for listing in the NRHP. Finally, we also concur with your determination that the remaining 398 historic properties submitted to our office for review are not eligible for listing in the NRHP.

Regarding the Phase I archaeological investigation that was undertaken for the technical report, I have no concerns with the work that has been performed to date and presented in the report. That said, I fully expect that FTA and Sound Transit realize that more intensive archaeological investigation will be required following the selection of the preferred alternative for the project. The Phase I investigation that was performed provides an excellent broad stroke of expectations regarding the archaeological environment but falls far short of properly evaluating the potential to impact intact archaeological resources within the proposed corridor. Once a preferred alternative is selected, a more robust evaluation of potential effects will be expected.

As always, DAHP appreciates receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.



These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Sterner", with a long horizontal flourish extending to the right.

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

Cc: Kent Hale, Sound Transit

