

3.7 Cultural Resources

The cultural and historic resources of a community tell the story of its past. Federal and state laws protect historic properties (also called significant cultural resources), which can include historic buildings, structures, districts or objects, and archaeological sites; archaeological districts; and Traditional Cultural Properties (places important to the beliefs, customs, or practices of local communities).

Has any new information has been developed since the Draft EIS?

In February 2010, WSDOT completed cultural resources investigations on the Grass Creek mitigation site, which is the proposed compensatory mitigation site for project effects on wetlands and intertidal mudflats. The cultural resources study area was amended to include this site. Cultural resources investigations consisted of archaeological investigations and a historic resources survey to determine whether significant cultural resources were located within the site.

What regulations apply to cultural resources?

Federal Regulations

NEPA states that the federal government must use all practicable means to preserve important cultural and historic aspects of our heritage. Section 106 of the National Historic Preservation Act states that agencies must consider a project's effects on districts, sites, structures, and objects that are listed in or eligible for inclusion in the NRHP. A cultural resource is eligible for the NRHP if it is at least 50 years old; possesses exceptional significance and integrity of physical characteristics, such as integrity of location, workmanship, materials, design, setting, feeling, and association; and if it meets at least one of the following criteria:

- A. Association with events that have made a significant contribution to the broad patterns of our history
- B. Association with the lives of persons significant in our past
- C. Embodiment of distinctive characteristics of a type or period, method of construction, or representative of the work of a master, or possesses high artistic values, or represents a significant and indistinguishable entity (for example, a district) whose components lack individual distinction

What is the Cultural Resources Discipline Report?

This section was derived from Appendix I, Cultural Resources Discipline Report, which includes the following information:

- Detailed information about the cultural resources study area
 - Complete information about the cultural resource investigations for this project.
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What is a historic property?

A historic property is a significant cultural resource. A cultural resource is "significant" if it is found to meet the criteria for eligibility to local, state, and national registers, and if it possesses integrity of its original historical features and characteristics.

What federal legislation protects cultural resources?

The National Historic Preservation Act—passed in 1966 and most recently amended in 1992—is intended to protect our nation's significant cultural resources by means of stewardship, funding, guidance, and partnership with agencies, Native American Tribes, and private parties. Section 106 of the National Historic Preservation Act is part of the legislation that provides guidance and instruction for implementing and fulfilling the intent of the National Historic Preservation Act by requiring federally funded and/or permitted projects to complete cultural resource studies as a part of the project's planning process.

- D. Has yielded, or is likely to yield, information important in history or prehistory

State Regulations

Washington's SEPA legislation states that cultural resources in or adjacent to a project area that are listed in or eligible for national, state, or local historic registers, and sites that are of archaeological, scientific, or cultural importance must be identified (RCW 43.21C). SEPA also states that projects must propose actions to reduce or control impacts on cultural resources. The Archaeological Sites and Resources Act prohibits knowingly excavating or disturbing precontact and historical archaeological sites on public and private land without a permit from the DAHP (RCW 27.53). The Indian Graves and Records Act protects Native American graves from disturbance and calls for appropriate reinterment of Native American remains with the tribes of origin, and additional laws protect the locations of sensitive archaeological resources, especially those related to Native Americans (RCW 27.44; RCW 42.56.300).

Local Regulations

The cities of Hoquiam and Tacoma maintain local registers of historic places, which include individually registered city landmarks, historic districts, and conservation districts. The Tacoma Landmarks Preservation Commission maintains the Tacoma Register of Historic Places, and the Hoquiam Historic Preservation Commission is responsible for the Hoquiam Register of Historic Places. Properties are nominated to these registers by the respective commissions and designated by city council resolution. Changes to the exteriors of listed properties are subject to review by the respective commissions. The City of Aberdeen currently does not have a local historic preservation program.

What cultural resources are in the study area?

The rich natural mosaic of trees, plants, and animals has attracted human settlement to the Grays Harbor region for many centuries. The first evidence of human occupation on the Pacific Northwest coast dates from nearly 12,000 years ago (Carlson 1990; Matson and Coupland 1995). Few excavated archaeological sites exist in the Grays Harbor region, and nearly all of those date to within the past 1,000 years. Older, unidentified sites likely exist locally as well, because they are found elsewhere on the Pacific Northwest coast and especially on the eastern Olympic Peninsula (Wessen 1983, 1990). The present communities of Aberdeen and Hoquiam represent several hundred years of development

What is precontact?

Precontact refers to the period before European explorers and settlers established contact with the indigenous Native American people who inhabited the region.

history and include a number of recognized historic landmarks. The industrial, commercial, and residential development that has occurred in the Grays Harbor area over the last century has likely adversely affected precontact and cultural resources in the region. However, this trend likely slowed significantly after the passage of the 1966 National Historic Preservation Act.

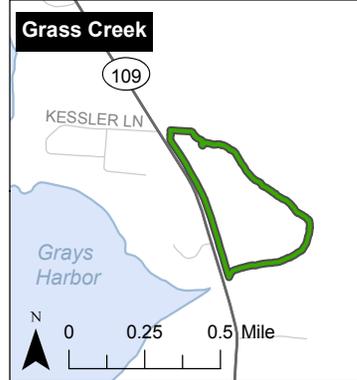
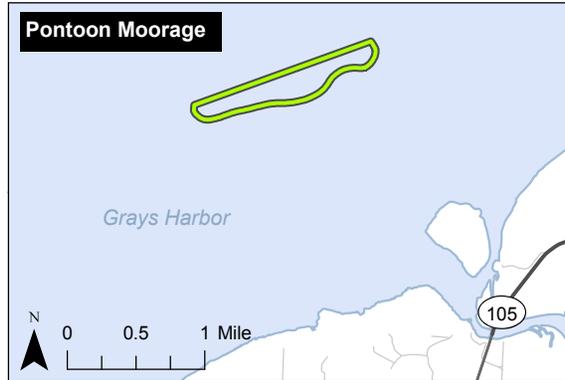
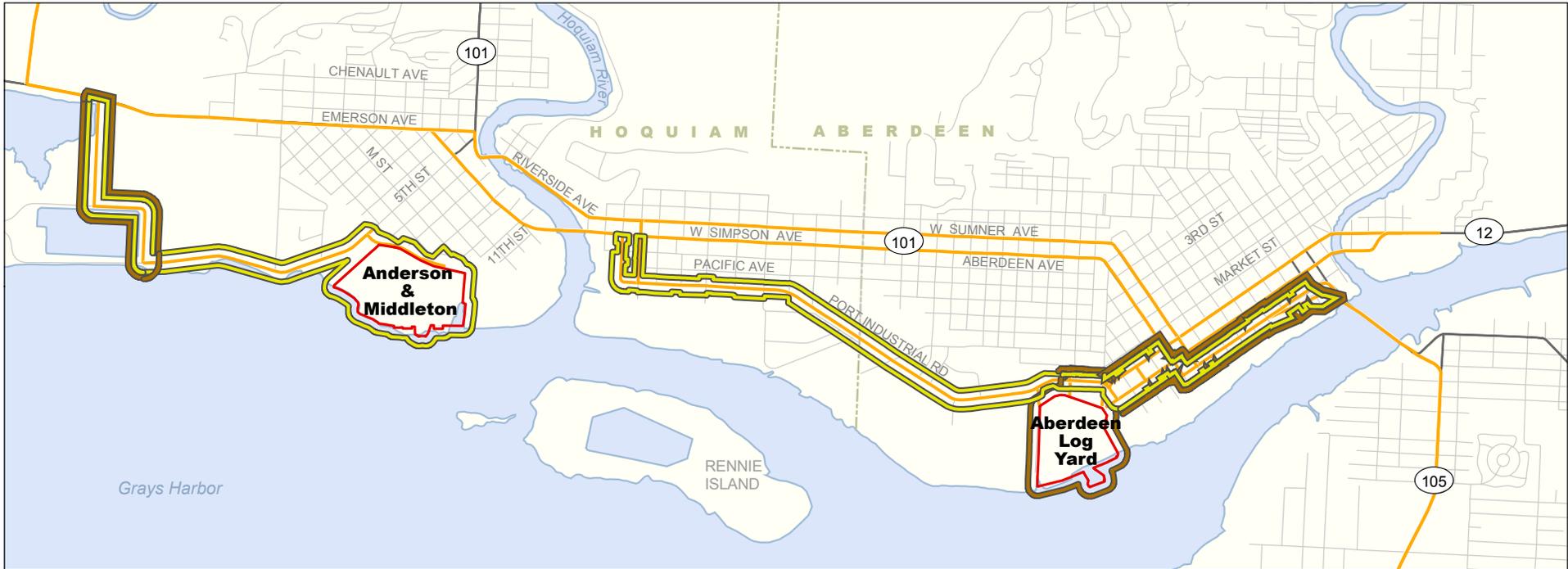
In developing the cultural resource study area—referred to as the Area of Potential Effects (APE)—WSDOT consulted with interested Native American tribes and the DAHP. The APE is defined as areas specific to each alternative and consists of horizontal and vertical components. The horizontal APE for both the Anderson & Middleton and Aberdeen Log Yard alternatives includes their entire properties and the proposed truck haul routes from their entrances and exits to existing truck routes along US 101 and SR 109, the CTC casting basin facility, the pontoon moorage sites, and a buffer of one tax parcel or 200 feet (whichever is less) around each. The CTC facility is considered as part of the APE because it is an option separate from either Grays Harbor build alternative. The vertical APE for both build alternatives includes the maximum proposed below- and above-ground construction extent for the proposed casting basin.

Exhibit 3.7-1 shows the APE for both build alternatives, the proposed pontoon moorage location, and the Grass Creek mitigation site. The APE includes haul routes for each build alternative. The section of the Aberdeen Log Yard Alternative haul route that is shown west of the Anderson & Middleton site accommodates the potential transport of excavated material from the Aberdeen Log Yard site to the City of Hoquiam sewage lagoon. The City of Hoquiam is planning to decommission and fill a portion of this lagoon, and excavated material from this project could be used as fill material. Also, the City of Aberdeen requested that trucks traveling from the Anderson & Middleton site to US 101 use Port Industrial Road to help reduce traffic on a commercial and residential section of US 101.

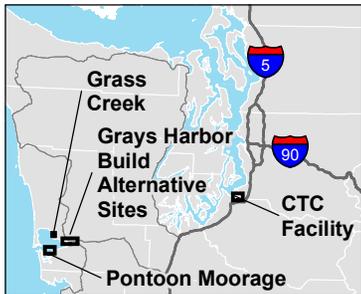
WSDOT cultural resource specialists conducted research and field investigations, including archaeological investigations and a historic resources survey, to determine whether significant cultural resources were located within the APE. The archaeological investigations included coring and mechanical trenching. Geological coring was first used to characterize the deposits at both build alternative sites and to assess the likelihood of encountering deeply buried archaeological sites. Following this effort, systematic archaeological trenching was conducted at intervals of 30 meters (about 98 feet) across both Grays Harbor build alternative sites in an effort to locate archaeological materials.

What is an Area of Potential Effects?

An Area of Potential Effects—or APE—is the geographic area where the character or use of historic properties might be directly or indirectly affected because of a project undertaking (36 CFR 800.16).



Source: Grays Harbor County (2006) GIS Data (Waterbody and Street), Grays Harbor County (2007) GIS Data (City Limit), WSDOT (2004) GIS Data (State Route), Pierce County (2006) GIS Data (City Boundary), Pierce County (2007) GIS Data (Street), Ecology (2001) GIS Data (Shoreline). Horizontal datum for all layers is State Plane Washington South NAD 83; vertical datum for layers is NAVD88.



- Anderson & Middleton Alternative part of the Area of Potential Effects
- Aberdeen Log Yard Alternative part of the Area of Potential Effects
- CTC facility site part of the Area of Potential Effects
- Grass Creek part of the Area of Potential Effects
- Proposed pontoon moorage location part of the Area of Potential Effects
- Potential haul route
- Build Alternative Site
- Existing CTC facility
- City limits

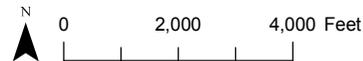


Exhibit 3.7-1. Cultural Resources Areas of Potential Effect for the Study Area

SR 520 Pontoon Construction Project



The historic resources survey involved examining and photographing all buildings and structures in the APE determined to be 45 years of age or older (Exhibit 3.7-2a, -2b, -2c, -2d, and -2e). The target age of 45 years old was selected to include all resources 50 years old at the time of the survey, plus any that might become 50 years old through the course of the site development or initial use. WSDOT surveyed and evaluated all identified cultural resources in the APE to determine their eligibility for listing in the NRHP. The farthest west portion of the haul route shown on Exhibit 3.7-1 is not shown on Exhibit 3.7-2a because no surveyed resources are located there.

CTC Facility

Research and fieldwork investigations indicate that two historic properties are located at the CTC facility part of the APE: Fire Station 15 at 3510 East 11th Street in Tacoma (already listed in the NRHP) and elements of the CTC facility located at 1123 Port of Tacoma Road. The eligible elements of the CTC facility include the administration building, two research and development buildings, and the structural plant. The Hylebos Bridge, which was built in 1939, is not eligible for the NRHP but has been determined eligible for the Washington Heritage Register and is a significant cultural resource at the state level.

Aberdeen Log Yard Alternative (Preferred Alternative)

Two historic properties were identified during research and fieldwork in the Aberdeen Log Yard Alternative part of the APE. The historic properties are residential houses associated with the growth and development of Aberdeen, and both are located along the proposed haul route in Aberdeen. A historical archaeological site is also present on the Aberdeen Log Yard property. The archaeological site, which is the remains of a lumber mill, is not NRHP-eligible.

Archaeological investigations identified features associated with the early twentieth century development at the Aberdeen Log Yard site, including the remnants of a historic lumber mill. Once known as Cow Point, the historic shoreline was located north of the site in 1859, and the entire area consisted of tidal mudflats. By 1906, the Hart-Wood Lumber Company's lumber mill was established in the southern portion of the property on a wharf projecting into the Chehalis River. Between 1913 and 1928, the lumber mill and wharf changed ownership and management but continued to grow in capacity and scale and became known as the American Mill Company's Mill B. During this period, the mill created usable land for its operations by a combination of hydraulic



NRHP Eligibility of Surveyed Resources

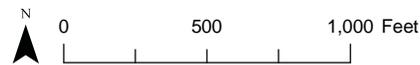
- Not NRHP-eligible resource
- NRHP-eligible property

- Anderson & Middleton Alternative part of the Area of Potential Effects
- Potential haul route
- Build Alternative Site

Source: Grays Harbor County (2006) GIS Data (Waterbody and Street), WSDOT (2006) Aerial Photograph, USDA-FSA (2006) Aerial Photograph. Horizontal datum for all layers is State Plane Washington South NAD 83; vertical datum for layers is NAVD88.

Exhibit 3.7-2a. Properties 45 Years of Age or Older and Identified Historic Properties within the Area of Potential Effects

SR 520 Pontoon Construction Project





NRHP Eligibility of Surveyed Resources

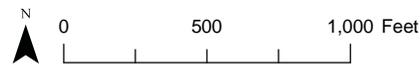
- Not NRHP-eligible resource
- NRHP-eligible property

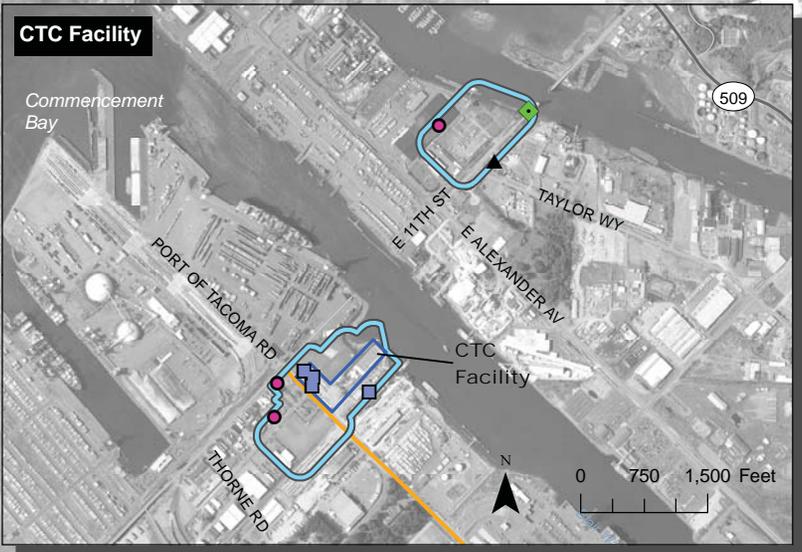
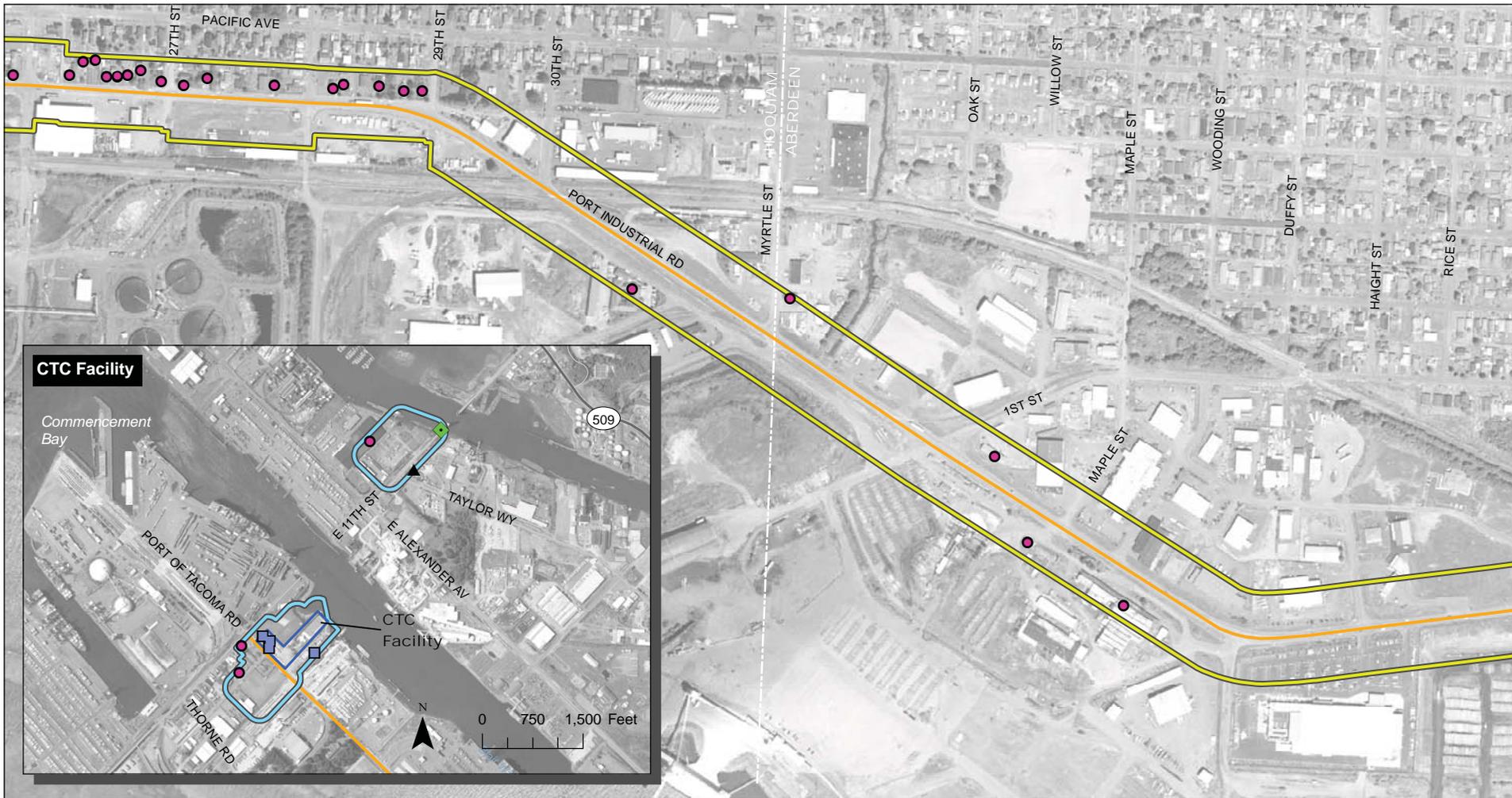
- Anderson & Middleton Alternative part of the Area of Potential Effects
- Potential haul route

Source: Grays Harbor County (2006) GIS Data (Waterbody and Street), WSDOT (2006) Aerial Photograph, USDA-FSA (2006) Aerial Photograph. Horizontal datum for all layers is State Plane Washington South NAD 83; vertical datum for layers is NAVD88.

Exhibit 3.7-2b. Properties 45 Years of Age or Older and Identified Historic Properties within the Area of Potential Effects

SR 520 Pontoon Construction Project





NRHP Eligibility of Surveyed Resources

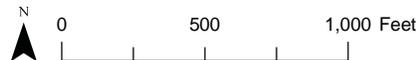
- Not NRHP-eligible resource
- NRHP-eligible property
- ▲ NRHP-listed property
- ◆ WHR-eligible property

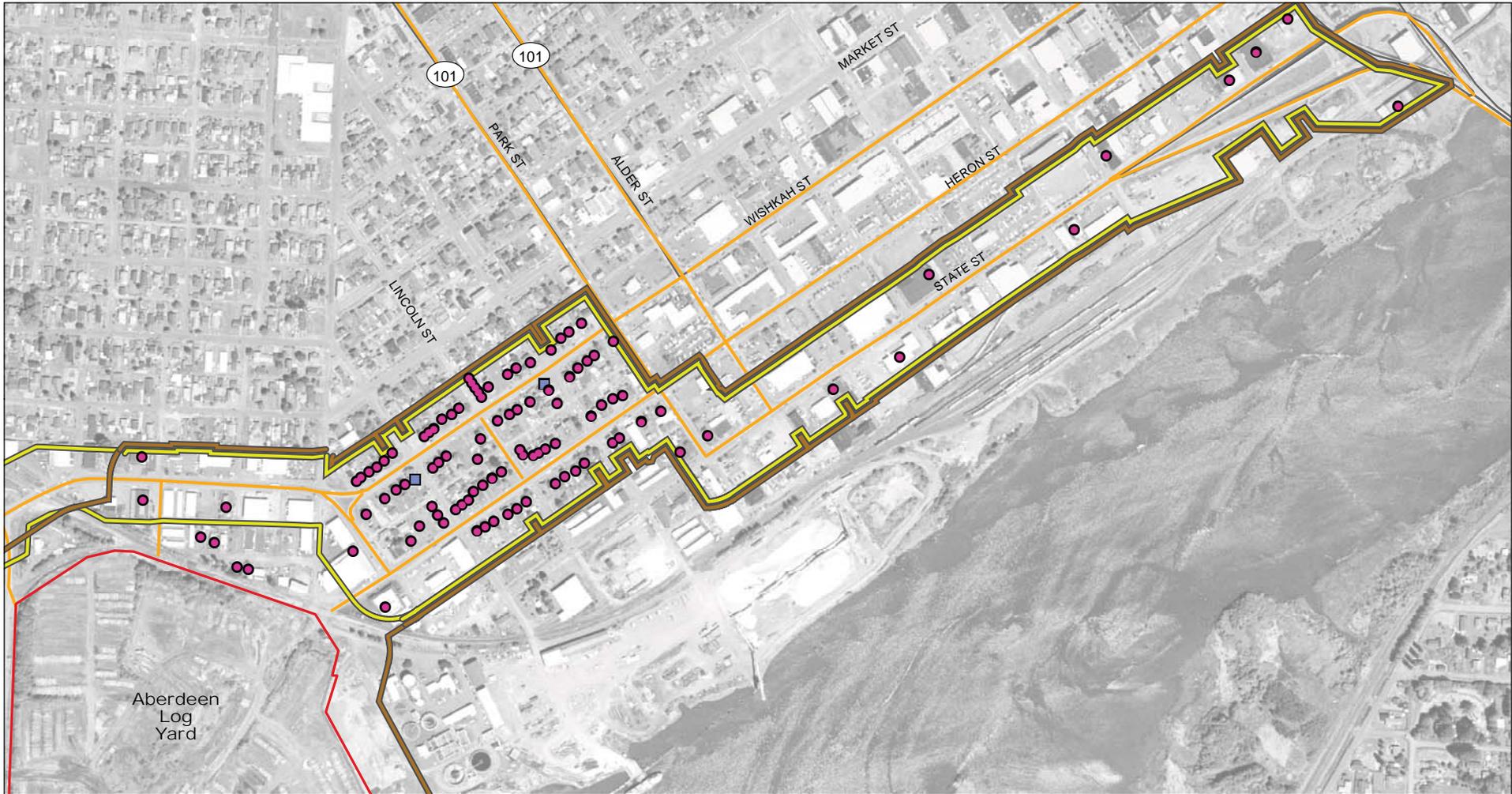
- Anderson & Middleton Alternative part of the Area of Potential Effects
- CTC facility site part of the Area of Potential Effects
- Potential haul route
- Build Alternative Site
- Existing CTC facility

Source: Grays Harbor County (2006) GIS Data (Waterbody and Street), WSDOT (2006) Aerial Photograph, USDA-FSA (2006) Aerial Photograph. Horizontal datum for all layers is State Plane Washington South NAD 83; vertical datum for layers is NAVD88.

Exhibit 3.7-2c. Properties 45 Years of Age or Older and Identified Historic Properties within the Area of Potential Effects

SR 520 Pontoon Construction Project





NRHP Eligibility of Surveyed Resources

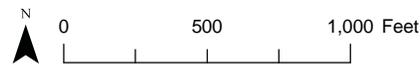
- Not NRHP-eligible resource
- NRHP-eligible property

- Anderson & Middleton Alternative part of the Area of Potential Effects
- Aberdeen Log Yard Alternative part of the Area of Potential Effects
- Potential haul route
- Build Alternative Site

Source: Grays Harbor County (2006) GIS Data (Waterbody and Street), WSDOT (2006) Aerial Photograph, USDA-FSA (2006) Aerial Photograph. Horizontal datum for all layers is State Plane Washington South NAD 83; vertical datum for layers is NAVD88.

Exhibit 3.7-2d. Properties 45 Years of Age or Older and Identified Historic Properties within the Area of Potential Effects

SR 520 Pontoon Construction Project

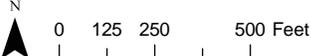




 Area of Potential Effects

Exhibit 3.7-2e Area of Potential Effects for the Grass Creek Mitigation Site

SR 520 Pontoon Construction Project



fill from river dredging and depositing extensive wood refuse waste created as byproducts of lumber processing.

Although the historical lumber mill and its various supporting structures were demolished in the 1960s, several of the more substantial foundations remain below the surface of the Aberdeen Log Yard site. Archaeological investigations uncovered the foundations of the boiler and engine rooms and the waste burner. However, WSDOT (on behalf of FHWA) has determined that this historic property is not eligible for the NRHP. FHWA and WSDOT submitted this determination to DAHP and received DAHP's concurrence on this finding.

Two residential houses were evaluated as historic properties eligible for the NRHP because of their association with the development of residential architecture west of Aberdeen's central business district from the 1900s through the 1920s. They are located within the APE west of Aberdeen's central business district along the designated haul routes at 201 South Washington Street and 1101 West Wishkah Street. These two properties are also within the Anderson & Middleton Alternative part of the APE. See *How would construction of the casting basin facility directly affect cultural resources?* below for more information about these properties.

Anderson & Middleton Alternative

The Anderson & Middleton site has a long history of use and development related to precontact populations of Native Americans in the area and the growth and expansion of Hoquiam. Five NRHP-eligible historic properties were identified in the Anderson & Middleton Alternative portion of the APE. One of these properties is a railroad depot, two are residential houses in Aberdeen, one is a residence in Hoquiam, and one is an archaeological site—remnants of a fish trap complex and a historical lumber mill. The lumber mill works lack sufficient integrity and research potential to contribute to the overall integrity of the site and, therefore, do not contribute to the archaeological site's eligibility for the NRHP (see Appendix A to Appendix I, Cultural Resources Discipline Report).

Before 1900, the shoreline was north of the present-day Anderson & Middleton property boundary and just south of the existing rail line, with the entire site in open water or tidal mudflats. By 1902, the citizens of Hoquiam had established a public dock that projected into the Chehalis River channel due south from 8th Street. (Unlike the rest of this Final EIS, the cultural resources analysis considers the Anderson & Middleton site to be on the Chehalis River rather than Grays Harbor based on historical maps.) In 1903, the Grays Harbor Lumber Company established a lumber mill, lumber yard, and lumber sheds on wharves

west of the city pier. Between 1907 and 1916, the Grays Harbor Lumber Company expanded its property by filling the tideflats between the lumber mill and the shore with fill. Log storage areas eventually extended up to the shoreline, and by 1940, the entire Anderson & Middleton site was entirely on useable land. At this time, the complex was known as the Blagen Mill and its output included finished lumber, shingles, and semiprocessed wood products for a variety of domestic and international clients.

All surface structures on the Anderson & Middleton Alternative site were demolished in the 1960s, but a variety of subsurface foundations and features still remain and were uncovered during archaeological investigations. The foundations and features include portions of a boiler room, waste burner, rail and crane beds, and numerous planked roads used for log storage. These features were considered together as one large historical archaeological site representing an early- to mid-twentieth century lumber industry. WSDOT (on behalf of FHWA) has determined that this historic property is not eligible for the NRHP. WSDOT and FHWA submitted this determination to DAHP and received DAHP's concurrence on this finding.

A second archaeological site, representing precontact Native American fishing activities, was also discovered during the archaeological investigations. One common technique used by people of the Pacific Northwest coast was diversion devices, known as fish traps. These features directed or entrapped fish in an area where they could be easily harvested. Fish traps are usually located in estuaries, within stream channels, or along tidal mudflats. On the southern Pacific Northwest coast, these features tend to be composed of multiple, vertically set wood stakes, ranging from small clusters to very large alignments.

Fish trap features were observed in nine archaeological trenches at the Anderson & Middleton Alternative site. Radiocarbon dating of several of these fish trap stakes revealed that the stakes were around 650 years old. The fish trap complex was evaluated as a historic property eligible for the NRHP.

Beyond the boundaries of the Anderson & Middleton site but within the APE (along the haul route), the historic resources survey identified four NRHP-eligible historic properties. One historic property is the Northern Pacific Railroad Depot at 719 8th Street in Hoquiam, built in 1899. The other properties are residential houses west of Aberdeen's central business district along the designated truck haul routes at 411 22nd Street, 201 South Washington Street, and 1101 West Wishkah Street. The latter two properties are also within the Aberdeen Log Yard

Alternative part of the APE. Each property is associated with the growth and development of Aberdeen in the 1890s and 1900s.

Outside the boundaries of the Anderson & Middleton part of the APE, large beds of sweetgrass—a tall sedge (*Schoenoplectus pungens*) that grows on the flats in the intertidal zone—are known to exist in the area along the shoreline of Bowerman Basin within the Grays Harbor National Wildlife Refuge. The largest and most accessible beds lie west of the Anderson & Middleton Alternative part of the APE; smaller beds were identified within the APE along the designated truck haul route on Paulson Road. Sweetgrass is one of the most important plant resources in Grays Harbor for native weavers from the Chehalis, Quinault, and other regional tribes. According to an ethnographic study prepared for the project (James 2007), these existing beds could be the remnant of a much larger stand of these plants along the north shore of the harbor. Other plants traditionally important to weavers and found in Grays Harbor include cattail, swamp grass, and stinging nettle. None of the traditional plant resources identified in the APE are eligible for the NRHP.

Pontoon Moorage Area

No historic properties were identified in the proposed pontoon moorage area during record searches. WSDOT conducted underwater archaeological investigations within the moorage area, and no cultural resources were identified.

Grass Creek

No historic properties were identified during research and fieldwork of the Grass Creek mitigation site.

Prior to the arrival of Euro-American settlers, the Grass Creek vicinity was inhabited by numerous indigenous peoples. The first Euro-American settlers arrived in this area in the late 1850s. The earliest Grays Harbor County tax records indicate that N.E. Holman owned five lots in the vicinity of Grass Creek in 1908, including the two parcels that make up the project APE. The property was passed to Fred E. Pape and Henry E. Pape in 1918, and remained unimproved until 1926. In 1926, the land within this portion of the APE was improved with the construction of a drainage channel at its perimeter along the creek on the south, east, and north. Available evidence suggests the channel was excavated to provide drainage for the Grass Creek property to make it suitable for use as pasture land. The existing earthen berm that runs adjacent to the drainage channel is part of the original drainage channel.

Although WSDOT identified the historical drainage channel and earthen berm on the Grass Creek property, these features were determined not

eligible for listing in the NRHP. Therefore, no significant cultural resources were identified at the Grass Creek property.

How did WSDOT evaluate direct effects on cultural resources?

To evaluate the proposed project's potential effects on cultural resources according to federal and state regulations, WSDOT cultural resources specialists, in partnership with the DAHP, established the APE, conducted research, and completed field work to identify historic properties. (See the prior section *What cultural resources are in the study area?* for more detail on the field work.) WSDOT cultural resources specialists then analyzed the proposed designs and operations of the build alternatives to determine their effects on the identified historic properties in the APE. WSDOT also consulted with Native American tribes that might have historical ties to the study area and could be affected by the proposed action. In addition to the PCPACT and technical working group meetings discussed in Chapter 1, WSDOT conducted additional outreach with tribes in the Grays Harbor vicinity.

WSDOT initiated preliminary outreach and informal briefings with DAHP and interested and potentially affected tribes in 2005 before the project was formally initiated. DAHP and tribes were formally invited to participate in the NEPA process in 2007. WSDOT initiated formal consultation with interested and potentially affected tribes under Section 106 of the National Historic Preservation Act in 2007 and with DAHP in 2009. The initial consultation correspondence to DAHP included a request for concurrence on the initial APE, with which DAHP formally concurred. WSDOT then formally requested concurrence on revisions to the APE, and DAHP concurred with the revised APE in 2010.

WSDOT sent letters of request to eight area tribes to initiate government-to-government consultation:

- The Confederated Tribes of the Chehalis Reservation
- The Hoh Tribe
- The Puyallup Tribe
- The Quileute Nation
- The Quinault Indian Nation
- The Shoalwater Bay Tribe
- The Skokomish Tribal Nation
- The Squaxin Island Tribe

While initiating formal consultation, WSDOT also invited these eight tribes to participate in the NEPA process as participating agencies under Section 6002 of SAFETEA-LU. In December 2007, the Squaxin Island

What is Section 106?

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their undertakings on historic properties and provide the Washington State Department of Archaeology and Historic Preservation, affected tribes, and other stakeholders a reasonable opportunity to comment. Requirements of Section 106 review apply to any federally funded, licensed, or permitted undertaking. The review process mandated by Section 106 is outlined in regulations issued by Advisory Council on Historic Preservation (36 CFR Part 800).

Tribe declined participating agency status and informed FHWA that they would require no further consultation on this project. The Quinault Indian Nation formally accepted participating agency status in January 2008. In August 2009, the Quileute Indian Nation also declined further project consultation. WSDOT also closed consultation with the Hoh Tribe on this project in September 2010. The other tribes did not provide formal correspondence declining or accepting participation; however, the Chehalis have been participating in the PCPACT meetings, which are coordination meetings that are held as part of the NEPA process. WSDOT also initiated consultation with the Puyallup Tribe in the Tacoma area.

WSDOT evaluated the project's potential effects on historic properties using the Criteria of Adverse Effect (36 CFR 800.5) outlined in Section 106 of the National Historic Preservation Act. This legislation states that a project would have an adverse effect on a historic property if it results in changes to the property's characteristics that qualify it for inclusion in the NRHP. Potential adverse effects include the physical destruction of an entire historic property; damaging, altering, or removing a portion of a historic property; and introducing environmental factors that are out of character with the historic property and alter its setting and integrity (for example, visual obstructions or noise).

The results of WSDOT's evaluation of direct effects on cultural resources in the APE were summarized in Appendix I, Cultural Resources Discipline Report. WSDOT submitted initial determinations on the identification of historic properties in the APE to DAHP in 2009, and DAHP formally concurred with those determinations. WSDOT submitted the Cultural Resources Discipline Report to DAHP and tribes for review and requested formal concurrence from DAHP on the identification of historic properties in the APE and the evaluation of the project's potential effects, as described in the report. WSDOT received formal concurrence from DAHP in July 2010 stating that the project would not have an adverse effect if the Aberdeen Log Yard Alternative is selected.

How would construction of the casting basin facility directly affect cultural resources?

Aberdeen Log Yard Alternative (Preferred Alternative)

Two residential houses in the Aberdeen Log Yard Alternative part of the APE meet the criteria for NRHP eligibility. These houses are located along the proposed truck haul routes in the APE at 201 South Washington Street and 1101 West Wishkah Street in Aberdeen east of

the Aberdeen Log Yard site. Both houses are eligible under Criterion C of the NRHP because they are good examples of their respective architectural styles and forms near Aberdeen from the early twentieth century. Local examples of these types and styles of residences that have retained a high level of integrity are now few.

The two historic properties are near the designated truck haul routes along West Heron Street and West Wishkah Street, which are wide thoroughfares, each with an approximate width of 100 feet. Residences along these streets are generally set back an additional 10 to 20 feet from the curbs.

Potential direct effects on the two historic properties would include an increase in visual and audible intrusions caused by truck traffic associated with developing the Aberdeen Log Yard site. Due to the physical separation of the houses from the site and setbacks from the truck haul route, changes in physical setting likely would be minimal under this alternative because of their distance from the roadway.

The Aberdeen Log Yard Alternative would not likely adversely affect the two historic properties. The proposed truck haul routes are principal transportation corridors through downtown Aberdeen, and the routes are already used by a relatively high volume of heavy truck traffic to the industrial areas to the west of the central business district, including the Port of Grays Harbor. The historic properties also do not appear to possess features or characteristics that would be adversely affected by audible intrusions or low-level vibrations; therefore, their historical significance would remain unaffected. More specific information on noise effects is included in Section 3.10, Noise, and the Noise Technical Memorandum in Appendix L.

Anderson & Middleton Alternative

Five historic properties (an archaeological site and four historic resources) in the Anderson & Middleton Alternative's APE meet the criteria for NRHP eligibility. The historic resources consist of a railroad depot and three residential houses.

The archaeological site is eligible under Criterion D of the NRHP for its data potential, specifically the ability to address important research questions. The precontact archaeological component was identified as a fish trap complex and is an important resource that could address research questions regarding Native American resource procurement and subsistence in the region, as well as provide information about the construction and operation of these types of precontact features. The lumber mill works component of the archaeological site lacks sufficient integrity and research potential to contribute to the overall integrity of

the site. Constructing the casting basin at the Anderson & Middleton site would disturb many of the site's elements and result in an adverse effect on the data potential of the fish trap complex.

The Northern Pacific Railroad Depot in Hoquiam is situated outside the northern boundary of the Anderson & Middleton site, but it is not along any proposed truck haul route. The property is eligible under Criteria A and C of the NRHP. This site is historically significant under Criterion A for its association with the Northern Pacific Railroad and its role in the development of Hoquiam and the surrounding Grays Harbor region. Under Criterion C, the building embodies the characteristics and construction method of a Northern Pacific Railroad depot built with Arts and Crafts-style influences and is a good example of this architectural style and form in the Grays Harbor region of western Washington from the turn of the nineteenth century.

Potential direct effects on the railroad depot would include an increase in visual and audible intrusions caused by potential rail and truck traffic associated with constructing and operating a casting basin at the Anderson & Middleton site. The railroad depot is located on an active rail line and was originally constructed with rail activity in mind. Because the depot is physically separated from the Anderson & Middleton site, changes in the railroad depot's physical setting likely would be minimal and developing this alternative would not likely result in an adverse effect on the property. Despite potential increases in visual and audible intrusions and vibrations, the railroad depot does not appear to possess features or characteristics that would be adversely affected by audible intrusions or low-level vibrations; therefore, its historical significance would remain unaffected.

The three residential houses are located in the APE at 411 22nd Street, 201 South Washington Street, and 1101 West Wishkah Street along the proposed truck haul routes east of the Anderson & Middleton site. They are each eligible under Criterion C of the NRHP because they are good examples of their respective architectural styles and forms in Aberdeen and Hoquiam from the early twentieth century. Currently only a few local examples of these types and styles of residences have retained a high level of integrity.

The residential house at 411 22nd Street is located in proximity to the designated truck haul route along 22nd Street. The street is approximately 80 feet wide, and the residence is set back an additional 10 to 20 feet from the curb. The residential houses at 201 South Washington Street and 1101 West Wishkah Street are located in proximity to the proposed truck haul routes along West Heron Street and West Wishkah Street. Both of these streets are wide thoroughfares, each

approximately 100 feet wide. The residences on these streets themselves are generally set back an additional 10 to 20 feet from the curbs.

Potential direct effects on the residences would include an increase in visual and audible intrusions caused by truck traffic associated with developing the Anderson & Middleton site. Due to the physical separation of the properties from the site and setbacks from the truck haul route, changes in the property's physical setting likely would be minimal under this alternative because of its distance from the roadway. These historic properties do not appear to possess features or characteristics that would be adversely affected by audible intrusions or low-level vibrations; therefore, their historical significance would remain unaffected, and there would be no adverse effect on these properties as a result of the proposed project. More specific information on noise effects is included in Section 3.10, Noise, and Appendix L (Noise Technical Memorandum).

How would pontoon-building operations directly affect cultural resources?

CTC Facility

The two historic properties in the CTC part of the APE are situated in a location that is physically separate and apart from the portion of the CTC facility. As a result, the use of the CTC casting basin facility would result in no adverse effect on these historic properties.

Grays Harbor Build Alternatives

The effects of pontoon-building activities at both Grays Harbor build alternative sites would be similar to those discussed above for casting basin facility construction. Effects would consist of increases in noise and visual intrusions during construction activities and then during operation of the casting basin facility. These effects would not be considered adverse effects on historic properties in the APE.

What effects would pontoon moorage have on cultural resources?

WSDOT conducted underwater archaeological investigations within the moorage area. No cultural resources were identified in the moorage area.

Would the project affect historic properties?

Based on available information, the project is expected to adversely affect one identified historic property in the APE: archaeological site at the Anderson & Middleton site if that build alternative is selected. If the

Anderson & Middleton site is selected, then WSDOT anticipates implementing a mitigation plan to mitigate the project effects and to comply with Section 106 of the National Historic Preservation Act. The temporary noise and visual effects would not affect the use, character, or integrity of the historic characteristics of the historic resources in the APE.

How would the Grays Harbor build alternatives compare in their direct effects on cultural resources?

Exhibit 3.7-3 summarizes and compares the effects of the Grays Harbor build alternatives on identified historic properties in the APE.

EXHIBIT 3.7-3
Cultural Resources Summary of Direct Effects ^a

Resource	Aberdeen Log Yard Alternative (Preferred Alternative)	Anderson & Middleton Alternative
Cultural resources	Two residential houses: no adverse effect	Northern Pacific Railroad Depot : no adverse affect Three residential houses: no adverse effect
Archaeological site	None	Archaeological site would be adversely affected

What indirect effects would the project have on cultural resources?

WSDOT expects that no indirect effects on cultural resources would result with the build alternatives since any project-related effects would be direct effects. There are no other actions related to project activities at either build alternative site that would result in indirect effects related to cultural resources.

What would happen to cultural resources if the project were not built?

With the No Build Alternative, no cultural resources would be affected. The historic properties in the APE would continue to exist at their current locations and in their current conditions. They would not undergo any direct, indirect, long- or short-term effects related to the project.

What would the cumulative effect on cultural resources likely be?

The present-day communities of Aberdeen and Hoquiam represent several hundred years of development history and include a number of recognized historic landmarks. Past and present industrial, commercial, and residential development has likely removed or altered the character of several precontact and cultural resources in the Grays Harbor area over the last century. The project would directly affect one known significant cultural resource within the APE, and unanticipated resources could be discovered during construction. However, this would be a minor contribution to the overall cumulative effects to cultural resources that have likely occurred in the Grays Harbor region since the early nineteenth century.

What is the Section 106 consultation process?

An important part of the Section 106 review process is consultation with the State Historic Preservation officer (SHPO), all federally recognized Native American tribes that have an interest in the area being affected, and any persons or organizations that are interested in the cultural resources that could be affected by the project (36 CFR 800.3). The regulations do not stipulate specifically how consultation is to be carried out. However, consultation typically parallels the public participation process pursued under NEPA, and involves (1) formally notifying the SHPO and affected tribes of the undertaking; (2) inviting them to participate in planning for the project; and (3) seeking concurrence or comment on the project's APE, determinations of eligibility for any identified historic properties in the APE, and a final determination on the undertaking's possible effects on the properties.

The SHPO and affected tribes are provided 30 days to review and comment on these determinations. If an agency finds that a project would have no adverse effect on historic properties and no objections are raised during the consultation, it may proceed with the undertaking after this 30-day review period. If, however, after consultation with SHPO and the affected tribes, the agency makes a determination that the project would adversely affect identified historic properties in the APE, then further consultation on resolving adverse effects is required to seek ways to avoid, minimize, or mitigate the effects.

To resolve adverse effects, the agency consults with the SHPO, affected tribes, and others, including local governments, permit or license applicants, and members of the public via a series of written correspondence, conference calls, and face-to-face meetings. The

Advisory Council on Historic Preservation (ACHP) may also participate in consultation when there are substantial impacts on important historic properties, or when there are particularly important issues of concern.

Consultation usually results in a Memorandum of Agreement (MOA), which outlines agreed-upon measures that the agency will take to avoid, minimize, or mitigate the adverse effects. In some cases, the consulting parties may agree that no such measures are possible but that the adverse effects must be accepted in the public interest.

Why is consultation under Section 106 required?

The proposed SR 520 Pontoon Construction Project involves federal funding and permits; therefore, this project is required to satisfy requirements established under Section 106 of the NHPA of 1966, as amended (16 USC 470 et seq.). The NHPA is the primary mandate governing projects under federal jurisdiction that might affect cultural resources and requires consultation with project stakeholders and other interested parties.

What are the results of the Section 106 consultation?

The results of the Section 106 consultation process for the project are summarized in the section entitled *How did WSDOT evaluate direct effects on cultural resources?* earlier in this cultural resources section. WSDOT consulted with DAHP to establish the project APE and to identify historic properties. WSDOT also consulted with Indian tribes that might have historical ties to the study area and could be affected by the proposed SR 520 Pontoon Construction Project. In addition to the PCPACT and technical working group meetings discussed in Chapter 1, WSDOT conducted additional outreach with tribes in the Grays Harbor vicinity.

The results of WSDOT's evaluation of direct effects on cultural resources in the APE, which are summarized in Appendix I, Cultural Resources Discipline Report and Appendix U, Summary of Effects Technical Memorandum, were submitted to DAHP in May 2010 for review. WSDOT received formal concurrence on the identification of historic properties in the APE and the determination that the project would have no adverse effect if the Aberdeen Log Yard Alternative is selected.