

**CULTURAL RESOURCES TECHNICAL REPORT,
POINT WELLS MIXED-USE REDEVELOPMENT PROJECT EIS,
SNOHOMISH COUNTY, WASHINGTON**

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JUNE 1, 2015
REVISED JULY 23, 2015



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CULTURAL RESOURCES REPORT COVER SHEET

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Title of Report: Cultural Resources Technical Report, Point Wells Mixed-Use Redevelopment Project EIS, Snohomish County, Washington

Date of Report: July 23, 2015

County(ies): Snohomish Section: 35 Township: 27 N, Range: 3 E

Quads: Edmonds West, WA Acres: 61

PDF of report submitted (REQUIRED) Yes

Historic Property Inventory Forms to be Approved Online? Yes No

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

TCP(s) found? Yes No

Replace a draft? Yes No

Satisfy a DAHP Archaeological Excavation Permit requirement? Yes # _____ No

Were Human Remains Found? Yes DAHP Case # _____ No

DAHP Archaeological Site #:

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

Executive Summary

This report presents methods and results of a cultural resources analysis for the Point Wells Mixed-Use Redevelopment Project EIS in Snohomish County, Washington. On behalf of BSRE Point Wells, LP, EA Engineering, Science, and Technology, Inc., PBC (EA) requested that Cultural Resource Consultants, Inc. (CRC) prepare this cultural resources analysis to ensure that potential impacts to cultural resources are considered in the proposal in accordance with the Washington State Environmental Policy Act (SEPA), and other applicable regulations. CRC's investigations to date have included review of relevant background literature and maps, records on file at the Washington State Department of Archaeology and Historic Preservation (DAHP), and available project plans and related information, as well as visual reconnaissance.

The majority of the Point Wells site has not been covered by prior cultural resources surveys. No previously recorded archaeological sites are located within the site. One overwater structure within the site was previously inventoried as a historic site and recommended not eligible for the National Register of Historic Places (NRHP). Redevelopment may impact this previously recorded historic structure as well as several additional structures over 50 years in age that are present within the site. It is assumed that these would be inventoried and evaluated for historical significance (i.e. eligibility for the NRHP) prior to redevelopment in conjunction with cleanup and remediation of the site overseen by Washington State Department of Ecology (Ecology). Evaluation of NRHP eligibility would take into consideration each structure's integrity (i.e. its ability to convey its significance) (NPS 2002). It is recommended that subsurface investigations be conducted to identify archaeological sites if redevelopment will intersect native soils beneath the limits of prior disturbance (e.g., remediation). Mitigation measures are recommended to avoid and minimize significant impacts to as-yet unrecorded cultural resources.

**Cultural Resources Technical Report,
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Introduction

Cultural Resource Consultants, Inc. (CRC) was retained by EA Engineering, Science, and Technology, Inc., PBC (EA) to conduct a cultural resources analysis for the Point Wells Mixed-Use Redevelopment Project EIS. Two development alternatives and a no action alternative were included in the analysis. The goal of CRC's assessment was to identify any previously recorded cultural resources in the project area, and evaluate the potential for previously recorded and unrecorded archaeological sites and historic buildings to be disturbed by construction and operations under the EIS alternatives.

CRC's work was intended, in part, to assist in addressing state regulations pertaining to the identification and protection of cultural resources (e.g., RCW 27.44, RCW 27.53), and compliance with the Washington State Environmental Policy Act (SEPA). The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly disturbing archaeological sites without a permit from the Washington State Department of Archaeology and Historic Preservation (DAHP), and the Indian Graves and Records Act (RCW 27.44) prohibits knowingly disturbing Native American or historic graves. Under SEPA, agencies must consider the environmental consequences of a proposal, including impacts to cultural resources, before taking action.

Assessment methods included a review of previous ethnographic, historical, and archaeological investigations onsite and in the local area, a records search at the Washington State Department of Archaeology and Historic Preservation (DAHP 2015) for known sites in the immediate area, and review of relevant background literature and maps (including General Land Office [GLO], United States Geological Service [USGS], and county atlases), as well as visual reconnaissance. Consideration of the project's potential impacts to cultural resources was based upon review of project correspondence (e.g., Letter from Gretchen Kaehler, DAHP, to Darryl Eastin, Snohomish County, Log: 022714-54-SN, 3 March 2014; copy on file at CRC), existing information about project site conditions, and the local archaeological, historical, and ethnographic records. Subsurface testing was not included because the project site is developed and the soils and groundwater contain contaminants that could be disturbed and released by subsurface explorations. This assessment utilized research design that considered previous studies, the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the project, as well as other applicable laws, standards, and guidelines (per 36 CFR 800.4(b)(1)).

Project Description

BSRE Point Wells, LP, proposes to redevelop approximately 61 acres owned by BSRE Point Wells, LP, at Point Wells, located in unincorporated Snohomish County, Washington. The project includes 45 acres of upland and 16 acres of tideland. Approximately 56 acres are located west of the Burlington Northern Santa Fe (BNSF) railroad right-of-way and track. The remaining 5 acres are east of the railroad at an elevation about 50 ft higher than the area west of the railroad (Figure 1). These areas are referred to as "Lower Bench" and "Upper Bench," respectively. The project is at the southwestern corner of Snohomish County, adjacent to King County (Figure 1). It is also in the area interpreted by the Washington Department of Fish and Wildlife as having fishing and hunting rights ceded to the signatory tribes of the Treaty of Point Elliot of 1855 (WDFW 2015).

BSRE Point Wells, LP, seeks to formulate and implement a phased mixed-use urban development that, if approved and constructed, would convert the site from heavy industrial use into a new urban center with residential, commercial/office, retail, and public service uses, as well as infrastructure improvements and public amenities. The site plan for the Point Wells Project would include new public amenities and opportunities for access to the waterfront that do not exist under current conditions.

Contaminants are present in the site soil and groundwater from past industrial uses. The site will undergo cleanup/remediation by Washington State Department of Ecology (Ecology) under the provisions of the Model Toxic Control Act (MTCA). There will likely be some overlap between the later phases of cleanup and early construction of the Point Wells Project on portions of the site that have already been cleaned up. For purposes of the Point Wells Project, Snohomish County Planning and Development Services (PDS) is serving as the SEPA lead agency. For purposes of the cleanup/remediation plans and actions on the site, Ecology is the responsible entity, and will conduct separate SEPA review. This analysis assumes that the site has been remediated consistent with such terms and conditions as may be required by Ecology in connection with its independent review.

Two development alternatives (Alternative 1 – Urban Center Alternative, and Alternative 2 – Urban Village Alternative) and a no action alternative are proposed as described in Chapter 2 of the Draft EIS. For the purposes of this assessment, the area of potential impacts to cultural resources is considered to be the EIS study area as described above and shown in Figures 1 and 2. This area is anticipated to include construction access, staging, and laydown areas, as well as utilities and roads.

Affected Environment

Determining the potential for the project to contain cultural resources was largely based upon review and analysis of previously collected environmental and cultural information for the project area. Environmental and cultural context information for this project is derived from relevant published reports, articles, and books (e.g., Cameron 2005; Nelson 1990; Suttles and Lane 1990); historical maps and documents (e.g., Metsker 1936; USCGS 1874; United States Surveyor General [USSG] 1860); historical air photos (Ecology 2006); geological and soils surveys (e.g., USDA NRCS 2015; WA DNR 2015); ethnographic accounts (e.g., Waterman 2001); and reports of archaeological and historical investigations (e.g., Gillis et al. 2006; Dellert et al. 2011) pertinent to the Point Wells site. The following discussion of project area geology, archaeology, history, and ethnography incorporates context information from CRC's prior work in the Edmonds area (e.g., Berger 2014; Kelly 2012) by reference.

Environmental Context

The project area is geographically situated on the eastern shoreline of Admiralty Inlet within the Willamette-Puget Lowland physiographic province, a province that is characterized by the wide “trough” between the Coast and Cascade Ranges (McKee 1972:290). The project is within the *Tsuga heterophylla* (Western Hemlock) vegetation zone typical of much of lowland western Washington (Franklin and Dyrness 1973). Native plants in this zone include dense forests of western hemlock, western red cedar, and Douglas fir with dense understory of Oregon grape,

salal, snowberry, and sword fern. The Point Wells site's Upper Bench currently contains several buildings and a retention pond, while the Lower Bench contains an asphalt plant and marine fuel terminal. Sheet pile wall, concrete seawall, and riprap have been used as shoreline protection on the western edge of the project area. Vegetation within the project is mainly limited to the southwestern shoreline and the area east of the railroad tracks. Small unnamed streams occupy drainages east of the project, some of which have been routed through pipes in the project.

Geomorphology of the project area was shaped in part by glacial events that took place during the Late Pleistocene following the advance of several glaciations that originated in Canada and extended between the Cascade and Olympic mountain ranges into the Puget Lowland (Downing 1983; Kruckeberg 1991). At the end of the Fraser Glaciation, glacial advance and retreat scoured and compacted underlying geology while meltwaters carved drainage channels and deposited till and outwash over the Puget Lowland (Booth et al. 2003; Thorson 1981).

The interplay of Holocene climate change, sea level change, and seismic activity, along with related geomorphic processes such as stream incision, bluff erosion, and alluvial deposition, further shaped the project area landscape. According to Lewarch et al. (2002), Point Wells was a gently sloping landform comprised of glacial deposits located several hundred feet inland from the marine shoreline of Puget Sound until postglacial sea levels began to rise. Sea levels began to rise rapidly after 8000 BP and then rates of increase slowed in the late Holocene. Sea level was within several meters of modern sea level by about 5000 BP and within one meter by about 1000 BP (Eronen et al. 1987). At Point Wells, the shoreline and bluffs are thought to have stabilized within the past 2,500 years (Gillis and Larson 2006a:8). The project is in the Southern Whidbey Island Fault Zone. Stratigraphic markers of subduction-thrust earthquakes and the uplift, subsidence, and deformation that accompany them have been observed at multiple locations on Puget Sound (Troost and Stein 1995). Evidence of seismic deformation nearest to the project comes from sediment cores collected from two marshes on southern Whidbey Island, which show uplift north of a fault strand and subsidence south of it between 2,900 and 3,400 years ago (Johnson et al. 2004).

The surface geologic deposit mapped in the Upper Bench is Qgt (Pleistocene continental glacial till from the Fraser glaciation) and the Lower Bench contains Qf (artificial fill, including modified land) (WA DNR 2015). Yount et al. (1993) map modified land on the Lower Bench and the western part of the Upper Bench, noting that such areas generally were brought to grade using cut and fill methods. Yount et al. (1993) map Vashon advanced outwash deposits in the eastern part of the Upper Bench. Soil units mapped within the site are Urban Land, the Alderwood-Urban land complex, 8 to 15 percent slopes, and Alderwood-Everett gravelly sandy loams, 25 to 70 percent slopes (USDA NRCS 2015). Urban Land covers the Lower Bench and consists of nearly level to gently sloping areas covered by streets, buildings, parking lots, and other structures that obscure or alter native soils (Debose and Klungland 1983). The Alderwood-Urban land complex consists of areas of Urban land intermingled with Alderwood soils, which formed on till plains in basal till parent material. The Alderwood-Everett soil consists of areas of Alderwood soils intermingled with Everett soils, which formed on terraces and plains in glacial outwash (USDA NRCS 2015).

Land within the project is generally level aside from a steep slope on the Upper Bench east of the BNSF railroad. Elevation of the Lower Bench is 10 to 20 feet above sea level behind a concrete, timber, and steel sheet pile seawall and rock bulkhead; elevation of the Upper Bench is about 50 feet higher. The Upper Bench is on top of a bluff. The Lower Bench has been filled and most of the shoreline is modified. Twentieth century industrial development altered the landscape of the project through grading and filling to produce level ground surfaces (Worthley 1975). The Lower Bench was historically an accretion shoreform (Johannessen et al. 2005; Washington State Department of Ecology 2015) or cusped foreland (Downing 1983). Both terms describe depositional beaches that have developed seaward of the original coastline. They are characterized by a distinct ridge of sand or gravel with a lower area to the landward side, often containing a lagoon or wetland (Collins and Sheikh 2005; Downing 1983; Shipman 2008; Washington State Department of Ecology 2015). Johannessen et al. (2005:34) identify Point Wells as a former longshore lagoon.

Subsurface explorations have previously been conducted within the project by geologists and archaeologists in order to characterize deposits and identify potential archaeologically sensitive matrices. Geotechnical borings monitored by archaeologists in the southern part of the project indicated the presence of fill 6 to 7 feet thick on top of Holocene beach and tidal marsh deposits that extend to approximately 20 feet below ground surface, over pre-Fraser non-glacial fluvial deposits (Gillis and Larson 2006b:5). Archaeological borings west of the seawall encountered recent beach and wetland deposits to a depth of 15 feet below surface, underlain by older beach deposits to a depth of 30 feet below surface (Gillis and Larson 2006b:5). Based upon the presence of wetland matrices, a spit or berm was likely present along the west side of Point Wells, allowing peat deposits to form over hundreds or thousands of years (Gillis and Larson 2006b:13). A 2010 report details more geotechnical borings and includes logs from prior explorations reaching at least 20 feet below surface (Hart Crowser 2010). Deposits identified within the project consisted of fill, colluvium (on the Upper Bench only), pre-Fraser nonglacial fluvial deposits, and pre-Fraser nonglacial lacustrine deposits (Hart Crowser 2010:5-6).

Archaeological Context

As previously discussed by Berger (2014), regional and local studies have provided an archaeological and historical synthesis of approximately the last 10,000 years of human occupation in western Washington (e.g., Larson and Lewarch 1995; Morgan 1999; Nelson 1990). Human use of the greater region is generally structured around the value of natural resources available in local environments including fresh water, terrestrial and marine food resources, forests, and suitable terrain. The archaeological context for evaluating the project area is provided by the regional chronological sequence and research domains as included in Blukis Onat (1987), Miss and Campbell (1991:40-45), and in cultural resource reports prepared for other various local projects (e.g., Lewarch et al. 2002).

Archaeological evidence suggests human occupation in the Puget Sound occurred following the last glacial retreat at the end of the Pleistocene, approximately 14,000 - 10,000 years ago. Changes to the landscape following deglaciation significantly influenced the spatial distribution of human activities, based on the availability of resources and the suitability of certain landforms for occupation. The earliest evidence of a human presence in the region, consisting primarily of a few chronologically diagnostic stone tools and flakes, indicates that humans colonized the Puget

Sound shortly after the retreat of ice from the last glaciation at the end of the Pleistocene (Carlson 1990). Recently, a Paleoindian component was identified in stratified sediments at a site in Redmond on Bear Creek, a tributary of the Sammamish River (Kopperl et al. 2010), approximately 15 miles southeast of the project.

Archaeologists have identified an early period of occupation dated to between 9000 – 5000 BP (before present) based on broad similarities in lithic assemblages. Many of the early sites are associated with the Olcott Complex in Western Washington, which are contemporaneous with similar Cascade Phase sites identified east of the Cascade Mountains. Olcott sites have been defined partly by the shared distribution of laurel-leaf-shaped bifaces and upland or upper river terrace site locations (Miss and Campbell 1991; Morgan and Hartmann 1999; Nelson 1990). These sites are found on or near the ground surface of glacial landforms. The Olcott complex is believed to be representative of highly mobile hunter-gatherers who typically did not utilize marine resources (Carlson 1990), and several Olcott sites have been documented and studied throughout Western Washington and the Olympic Peninsula. Many Olcott sites have been identified in Snohomish County (see Miss and Campbell 1991), including the Olcott type-site (Kidd 1964). Marine shorelines from this period are submerged, possibly eliminating a sizable portion of the archaeological record of this era (Miss and Campbell 1991:19).

After 5000 BP, archaeological evidence suggests a change in settlement patterns and subsistence economy in the region. From 5000 to 3000 BP an increasing number of tools were manufactured by grinding stone, and more antler and bone material was used for tool production. Occupation floors with evidence of hearths and structural supports suggesting more long-term habitations are more common during this period in contrast to the Olcott Complex. On Puget Sound, evidence of task-specific, year-round, broad-based activities, including salmon and clam processing, woodworking, and basket and tool manufacture, date from approximately 4200 BP (Larson and Lewarch 1995).

Characteristic of the ethnographic pattern in Puget Sound, seasonal residence and logistical mobility, occurred from about 3000 BP. Organic materials, including basketry, wood and food stuffs, are more likely to be preserved in sites of this late pre-contact period, both in submerged, anaerobic sites and in sealed storage pits. Sites dating from this period represent specialized seasonal spring and summer fishing and root-gathering campsites and winter village locations. Sites of this type have been identified in the Puget Sound lowlands, typically located adjacent to, or near, rivers or marine transportation routes. Fish weirs and other permanent constructions are often associated with large occupation sites. Common artifact assemblages consist of a range of hunting, fishing and food processing tools, bone and shell implements and midden deposits.

Similar economic and occupational trends persisted throughout the Puget Sound region until the arrival of European explorers. Beginning approximately two hundred years ago, relatively rapid social changes occurred under the pressures of acculturation. Contact between peoples of the Puget Sound region and those of Europe and the United States stimulated the local introduction and adoption of new technologies and political organization (Marino 1990; Suttles and Lane 1990).

Ethnographic Context

The project area was within an intertribal resource area and would have been used by various southern Coast Salish groups over time including Suquamish, Duwamish, Snohomish, and Snoqualmie peoples (Lane 1975a, 1975b; Tweddell 1974). The Point Wells site lies within the traditional territory of the “shil-shol-ahbsh” (Shilsholamish) or “narrow inlet people,” a band of the Duwamish tribe (Costello 1895; Waterman 1922:187), as well as that of ancestors of the Tulalip Tribes such as the Snohomish. The Duwamish are a Southern Lushootseed-speaking southern Coast Salish group (Suttles and Lane 1990). Shilsholamish territory extended from Smith Cove and Lake Union in Seattle north to the Snohomish River (Costello 1895:86). The Snohomish are a southern Coast Salish Northern Lushootseed-speaking tribe with traditional territory including the area from the mouth of the Snohomish River to Monroe, on Whidbey Island opposite Mukilteo, and the southern tip of Camano Island (Ruby and Brown 1992; Spier 1936; Suttles and Lane 1990; Tweddell 1974).

Settlements were often located on major waterways, heads of bays, or inlets, and people practiced a seasonal subsistence economy that included hunting, fishing, and plant food horticulture. In the winter, southern Coast Salish people lived at large permanent villages and they spent the summer hunting, fishing, and gathering at specialized, temporary camps located near food resources. There was an abundance of plant and animal resources available in estuarine and marine environments in the region. A combination of fish, shellfish, marine mammals, waterfowl, game, roots, and berries served as a rich, diverse, and relatively reliable resource base (Suttles and Lane 1990:489). Marine shorelines and intertidal zones were used intensively for habitation and resource processing and for resource procurement, respectively (Miss and Campbell 1991:52).

Ethnographers (Smith 1940, 1941; Snyder 1968; Spier 1936; Tweddell 1974; Waterman ca. 1920, 1922, 2001) gathered locations of villages and names for resource areas, water bodies, and other landscape features from informants. Point Wells is recorded as a named place in the ethnographic record, and other place names are noted on the surrounding landscape. The name for Point Wells is *I^utl³EtL stu^ubus* (“this side of *stibus*”), a reference to Point Edwards, called *stu^ubus* and located just over one mile to the north. According to Waterman (2001:55), pairs of promontories were often named in this way. Tweddell (1974:624) notes the Snohomish name *s^utoboc* for both Point Edwards and Point Wells. According to Morisset (Letter to Darryl Eastin, Snohomish County Planning and Development Services, from Mason D. Morisset, Attorney for the Tulalip Tribes, Re: Point Wells Development, 11 April 2011; copy on file at CRC), there were Snohomish villages at Point Wells and Point Edwards. The beach south of Richmond Beach was called *Q³e^uq³e^uwa:dEt* (“kinnickinick, Indian tobacco”), named for “a vine with leaves like those of huckleberry” (Waterman 2001:55). The Shilsholamish village nearest to the project, according to Waterman (2001:45-46), was *Cllco^u* at Salmon Bay in what is now the City of Seattle. This name was translated as “like shoving a thread through a bead, threading or inserting something,” which was descriptive of the narrow estuary that served as a connection to Lake Union and Lake Washington (Waterman 2001:45). On the west side of the Sound opposite Point Wells south of Kingston, three points used as campsites were called *kayópšed* (untranslated) (Snyder 1968:136).

Historic Context

Early Euro-American settlement of Snohomish County began on the heels of the Donation Land Claim Act of 1850. In 1853, the United States organized Washington Territory and appointed Isaac I. Stevens as its governor. Following several years of conflict, the Point Elliot Treaty was signed at Mukilteo on January 22, 1855. The treaty called for cession of lands to the United States and the maintenance of fishing rights and annuities, as well as the concentration of Indian people living in western Washington upon reservation lands (Marino 1990). Native people were forced to abandon most of their Puget Sound villages and relocate to reservations. The treaty dissolved Indian title to their traditional and accustomed lands and by 1855-1856 the federal government used military force to contain Indian people dissatisfied with the poor quality of reservation lands.

Based upon review of GLO records on file at the Bureau of Land Management (BLM), Euro-American settlement of the site began in the 1870s. A patent for lands containing the project was issued to Daniel Hines on February 25, 1874 (Serial/Accession No. WAOAA 076063, Sale-Cash Entry, 148.50 acres total) (BLM 2015). The 1871 territorial census lists a Daniel Hines in Snohomish County as a 28 year old farmer from Ohio (Ancestry.com 2006).

The logging industry was attracted to the project area by the great timber potential offered by coastal forests of cedar (Whitfield 1926). In the project vicinity, small sawmills were established at Lake Ballinger and a shingle mill operated near the present-day intersection of Dayton Avenue and Richmond Beach Road (Copass 1996:3). Euro-American settlement in the Edmonds area began in the 1860s but remained sparse until the 1880s. The railroad corridor that passes through the project has been in use since the late nineteenth century, with the Great Northern Railroad reaching Edmonds in 1891 (Cameron 2005:106-108; O'Donnell 1993).

After lands were logged, Euro-American use of the project area in the late nineteenth century to early twentieth century consisted of farming and grazing. Several families grazed their cows on Point Wells (Worthley 1973:31, 48, 89). The Richmond Beach area was known for its strawberry crop, chickens, and eggs in particular (Worthley 1973:17, 22). By 1891, Richmond Beach had a large enough population to support a school, and by 1899 a library had been established (Copass 1996:4). By 1897 there was a residential community of houses “along the beach road to Point Wells” (Worthley 1975:3).

Local residents in the 1970s recalled that William J. Potts, a Great Northern Railroad depot agent at Edmonds, purchased 80 acres on Point Wells in the late 1890s (Worthley 1973:12, 89). From 1900 until the Shell Oil facility was built in 1912, Potts’s land was home to a fruit farm and many cattle (Worthley 1973:89). Shoreline residents in the 1970s recalled Point Wells also being used in the early 1900s by Indians traveling by canoe from the north to work in farm fields in the river valleys of central and southern Puget Sound (Worthley 1973:48; Worthley 1975:84). Groups of Indians traveling by canoe would land at spits and beaches along the shoreline to fish, clam, hunt, and sleep along the way (Worthley 1973:81).

A 1907 publication described Point Wells as low and extending from a high bluff behind it, with anchorage between it and Edmund Point to the north (U.S. Hydrographic Office 1907:75-76). A few years later, it was described as a “low sandy point projecting 450 yards from the high land”

with a small shipyard on the point and a landing wharf on its north side (USCGS 1909:153). About ½ mile south of the project at Richmond Beach, there was a shingle mill with a short wharf; another wharf for loading gravel was ½ mile farther to the south (USCGS 1909:153).

Standard Oil Company and the Asiatic Oil Company (a predecessor of Royal Dutch-Shell) built a regional distribution terminal at Point Wells to meet the growing demand for petroleum products. Tanker ships brought the oil products from California refineries. Oil was stored on-site to fuel steamships as well as for local distribution by railroad tank car. A March 1912 newspaper article anticipated the new storage tank facility to be operational within 60 days, poising it to be the first ready by the opening of the Panama Canal. Standard Oil had 47 acres of land, 20 of which were filled (Seattle Times 24 March 1912:44). According to Worthley (1975:60), Standard Oil used a dredge to fill the ground behind the beach with sand and gravel in order to support the tanks. Facilities completed or in progress in March 1912 included six fuel oil storage tanks, a 400 foot long dock extending to 40-ft deep water, a concrete fuel pump house, and a concrete boiler house (Seattle Times 24 March 1912:44). A 940-ft long spur track was planned, as was a water pipe from a spring on Standard Oil's 17 acres above the Great Northern railroad tracks. The Asiatic Oil Company's facility, adjacent to the north of Standard Oil, was built to handle gasoline. In 1912, six tanks were under construction. A 250-ft long dock with dolphins was planned to accommodate steamships delivering bulk cargoes of gasoline (Seattle Times 24 March 1912:44).

By 1915, Standard Oil had 19 waterfront service stations with delivery facilities in Washington (Standard Oil Company 1915a:17). By 1917 Point Wells was "distinguished by prominent oil tanks and the wharf and warehouses at the foot of the bank" (USCGS 1917:205). There was a Standard Oil Company "compound on the hill above the plant" with five houses and a large car garage by 1927 (Worthley 1975:25). A fog signal with an electric siren was planned to be built and operated by Standard Oil on its wharf at Point Wells in 1920 (U.S. Hydrographic Office 1920:156). The signal was recently deactivated (Office of Coast Survey 2015).

Industries on the Point Wells waterfront were a major local source of employment, even during the Great Depression (Worthley 1973, 1975). Point Wells was the site of a conflict on June 30, 1934 during a weeks-long strike and dispute over a labor agreement between the International Longshoremen's Association (ILA) and employers at ports across the West Coast. Striking ILA members confronted strikebreakers at the Standard Oil facility in an attempt to prevent them from servicing tankers. The strike leader and head of the ILA, Shelvy Daffron was fatally shot (Seattle Post-Intelligencer 1 July 1934:1, 8). Similar confrontations occurred at several other ports, notably Seattle and San Francisco, but the strike held until July 31 following arbitration by the National Longshoreman's Board and a vote by union members to accept the new labor agreement (Reider and Crowley 1999).

Use of the Point Wells site in the middle twentieth century continued to be dominated by petroleum companies including Washington Refining Company, Shell Oil, and Standard Oil (Kroll Map Company 1943; Metsker 1936). Standard Oil occupied all of the Lower Bench by 1943. Standard Oil merged with five other companies in 1977 to form Chevron USA Inc. (Chevron Corporation 2015). Chevron used the facility as an asphalt petroleum refinery and light products/lube oil distribution terminal. The various types of petroleum products stored and/or

processed at the Point Wells site included crude oil, asphalt products, lubrication oils, fuel oils, aviation fuels, motor vehicle and marine vessel fuels, and thinners. The light products/lubrication oil distribution terminal and refinery are no longer in operation, but the facility continues to operate as a marine fuel and asphalt distribution center. The marine fuel transfer and asphalt distribution facility continues to be operated by Paramount Petroleum Corporation under the terms of an agreement with BSRE (David Evans and Associates 2011:1).

Historical Maps and Air Photos

A nautical chart produced by the Wilkes Expedition labels the project location as Pt. Wells and the landform is an accretionary beach backed by a steep bluff with forests to the east (U.S. Ex. Ex. 1841). The General Land Office (GLO) cadastral survey map does not show any cultural features such as trails, roads, residences, villages, or homestead improvements in or adjacent to the Point Wells site (Figure 3). The nearest cultural feature is a land claim labeled Ira Bartholamue approximately 3.5 miles east of the project on the northeast side of Lake McAleer (present-day Lake Ballinger) (USSG 1860). An 1874 coast chart shows the Lower Bench as a broad, vegetated low point with a sandy beach to the west and wooded slopes to the east on the Upper Bench (USCGS 1874) (Figure 4).

Review of historical maps indicates that the site was partially developed at the end of the nineteenth century. By 1895 there were two structures east of the Great Northern railroad tracks on the Upper Bench as well as a road descending from the Upper Bench to the Lower Bench terminating at a structure near the center of the Lower Bench (USGS 1895). Lands within the project were classified as “cut areas, not restocking” and the surrounding uplands were among “cut areas restocking,” indicating the area had already been logged once by the end of the nineteenth century (USGS 1897).

A photograph from 1909 shows a shipyard at the launch of the fireboat *Duwamish*, which is still used by the Seattle Fire Department (Duwamish, a fire boat, being launched at Richmond Beach, 1909; Image 604, Shoreline Historical Museum Photograph Collection, Shoreline, Washington). According to the caption by Shoreline Historical Museum staff, “the shipyard at Richmond Beach was located at Point Wells, before the Standard Oil docks.” The photograph shows a two-story wooden building along with pilings and shipways at the base of a forested bluff. The position of the shipyard relative to the Point Wells site is not clear from this photograph. A county atlas from 1910 shows several landowners within the site including Bank of California, Factory Imp. Co., L. S. Nelson, Coast Land Co., H. E. Johnson, the J. M. Colman Co., and Keith Inv. Co. (Anderson Map Company 1910).

Photographs of Standard Oil’s Point Wells facility in a company bulletin from 1915 show several storage tanks, the Standard Oil and Asiatic Oil Company docks, and Standard Oil Company buildings on the Lower Bench (Standard Oil Company of California 1915b:8-9). An aerial photograph of Point Wells taken in 1932 shows the Lower Bench as almost entirely covered by fuel storage and distribution facilities, with no structures on the very northern and southern ends of Point Wells. The Upper Bench appears forested and undeveloped (Charles Laidlaw, Aerial of Standard Oil tank farm and docks from southwest, Point Wells, 1932; Image 1983.10.18037, PEMCO Webster & Stevens Collection, Museum of History & Industry, Seattle). A 1934 county atlas shows Washington Refining Co. as owner of the northern part of the Lower Bench,

Standard Oil Co. as owner of the central part of the Lower Bench, Wash. C. Co. and M. Coleman as owners of the southern third of the Lower Bench, and M. Coleman as owner of land in the Upper Bench (Kroll Map Company 1934).

There was a fire on the Standard Oil dock in 1935 (Standard Oil docks fire, ca. 1935; Image 594, Shoreline Historic Museum Photograph Collection, Shoreline, Washington). An undated photograph shows Shell Oil's tanks and dock at "Richmond Beach," but the landform and dock appear to be identical to those visible in historical imagery of Point Wells (Shell Oil tanks at Richmond Beach, bird's-eye view, n.d.; Image 630, Shoreline Historical Museum Photograph Collection, Shoreline, Washington). A 1936 county atlas shows Wash. Ref. Co. as owner of the northern 1/3 of the Lower Bench, Standard Oil Co. as owner of the Upper Bench and the central part of the Lower Bench, and J. M. Colm., and E. L. Reber as owners in the southern end of the Lower Bench (Metsker 1936).

A 1942 topographic map shows a road parallel to the east side of the railroad tracks with a ramp crossing to the west-southwest over the tracks to the Lower Bench. On the Lower Bench there were three large buildings on the southern part of the point and two smaller buildings near the base of the bluff, along with the existing dock and the dock formerly in the northwestern part of the project; the Upper Bench appears undeveloped (USGS 1942). The 1943 county atlas shows Standard Oil Co. as owner of all of the Lower Bench and Heberlein as owner of the Upper Bench (Kroll Map Company 1943). This map notes two lights, one near the northwest edge of the Lower Bench and the other near the foot of the bluff. Archival review did not identify a lighthouse at Point Wells as suggested by Dellert et al. (2011:4); the lights at Point Wells were likely simple warning lights mounted on poles, similar to the pole-mounted fog siren erected by Standard Oil (U.S. Hydrographic Office 1920:156).

A 1955 topographic map shows more buildings, dozens of oil tanks, and rail spurs on the Lower Bench as well as a building on the Upper Bench (USGS 1955). Review of county assessor records indicates construction of several new buildings within the EIS area in the 1950s (Snohomish County 2015). The 1960 county atlas shows several oil tanks, the northern and southern rail spurs, and Heberlein Road, with all land in the EIS area owned by Standard Oil Co. (Kroll Map Company 1960). More tanks and buildings were added by 1969 (USGS 1969). The 1975 county atlas shows the entire EIS area as owned by Standard Oil Co. with both docks and rail spurs and several oil tanks (Metsker 1975). Conditions remained relatively unchanged from the 1960s until the 1980s when the dock at the northwest edge of the project was removed (Historicaerials.com 2011). Tanks and other structures were removed from the southern half of the Lower Bench by 2002 (Historicaerials.com 2011).

Previously Recorded Sites and Surveys

Fourteen cultural resource assessments on file at DAHP have previously been prepared within a distance of approximately one mile from the Point Wells site (Table 1). These have included archaeological and historic resource surveys for sewer projects (e.g., Gillis and Larson 2006a), proposed transportation developments (e.g., Juell 2006), and proposed park improvements (Gill 2008). Additionally, a records search and literature review report was previously prepared for an area that overlaps most of the current project site (Dellert et al. 2011). That study did not identify

any cultural resource sites within the project but recognized Point Wells as a landform type commonly used by tribes for habitation and resource gathering (Dellert et al. 2011:9).

Cultural resource studies for the Brightwater Regional Wastewater Project intersect the southern portion of the current site (Gillis and Larson 2006a, 2006b, 2006c; Gillis et al. 2006; Lewarch et al. 2002, 2006). Cultural resource studies were conducted for project elements including the Point Wells Portal south of the site, the Point Wells Marine Outfall along the southwestern edge of the site, and a staging area within the site north of the Portal. A cultural resources assessment was prepared for that project's EIS (Lewarch et al. 2002) and an archaeological treatment and monitoring plan was developed for the project (Lewarch et al. 2006). Reconnaissance survey and sidescan sonar survey of shallow waters at the Brightwater Point Wells Portal and Outfall did not identify any archaeological or historic sites including shipwrecks (Lewarch et al. 2002:124, 158), nor did archaeological monitoring of drilled borings (Gillis and Larson 2006b; Gillis et al. 2006). However, old beach landforms below historic period fill at Point Wells were considered to have a high probability for intact significant archaeological deposits (Gillis et al. 2006; Lewarch et al. 2006). Further details of these studies are included in Table 1.

As a result of these investigations, relatively few archaeological or historic sites have been identified in proximity to the current project. All previously recorded archaeological sites are located over one mile away from the Point Wells site, and only three archaeological sites have been recorded within a three-mile radius (Table 2). Of these, one site (45SN574) was recommended eligible for the National Register of Historic Places (NRHP) and one (45SN531) was recommended not eligible. The third site (45SN310) has not been evaluated for NRHP eligibility. No previously recorded archaeological sites would be impacted by the project.

The site nearest to the project is 45SN310. This site is located near the Deer Creek Hatchery access road and was identified as finely crushed mussel, barnacle and cockle shells visible in patches at the ground surface in a 10-x-15-meter area (Bard and McClintock 1996:6). The thickness of archaeological deposits at this site is unknown. No subsurface testing has been reported for this site.

Site 45SN531 is a segment of railroad grade from the Seattle-Everett Interurban Electric Railway located west of Lake Ballinger. The recording archaeologists did not observe any railroad ties, metal track fragments, or other materials clearly associated with the grade's use as public transportation in the early twentieth century (Gilpin and Gillespie 2009). This site was recommended not eligible for the NRHP due to diminished integrity of workmanship, setting, design, materials, feeling, and association (Gilpin and Gillespie 2009:45-46).

Site 45SN574 was identified as a fill layer containing historic-era artifacts associated with the Great Northern Railroad's section foreman's house, water tower, and cabin during an archaeological survey for proposed storm drain improvements at the Edmonds Rail Station (Shantry et al. 2011:1). Archaeological monitoring and testing were conducted to collect samples of archaeological material and document site stratigraphy. Based upon the results of these investigations, site 45SN574 was considered to have the potential to provide significant information about the past, namely details about working class life on the Edmonds waterfront in the early twentieth century (Shantry et al. 2011:39).

Only one register-listed historic property is located within a distance of approximately one mile from the project. This is the IOOF Cemetery, established in 1894 near the present-day intersection of North of Edmonds Way and 100th Street and listed on the WHR in 1972 (DAHP 2015). However, several historic buildings have been inventoried within approximately ¼ mile from the project (Table 3). These include several single-family homes dating from the late nineteenth century to the middle twentieth century. These were added to the Historic Property Inventory (HPI) inventory as part of DAHP’s 2011 HPI Upload Project, which involved the addition of available information from the County Assessors’ building records to WISAARD (ACI 2011a). None of the uploaded data was field verified at the time, nor were eligibility assessments conducted.

One of the previously recorded historic structures is located in the tidelands portion of the Point Wells site. This is a long, narrow rectangular building supported on a wharf that was identified as a part of the Point Wells refinery during a maritime heritage survey (ACI 2011b). The date of construction was estimated to be 1915 although the county assessor records did not confirm this (Howard and Johnson 2011:3). The building has a gable roof, corrugated metal cladding, and corrugated metal roofing, and did not appear to meet NRHP eligibility criteria (Howard and Johnson 2011). Comparison of photographs of this structure with those of other inventoried waterfront oil terminal structures (ACI 2011b; DAHP 2015) suggests that the materials and plan are typical for the time period and function but the structure at Point Wells appears to be in relatively poor condition.

Potential for Previously Unrecorded Cultural Resources

The DAHP statewide predictive model uses environmental data about the locations of known archaeological sites to identify where previously unknown archaeological sites are more likely to be found. The model correlates locations of known archaeological sites to environmental data “to determine the probability that, under a particular set of environmental conditions, another location would be expected to contain an archaeological site (Kauhi and Markert 2009:2-3). Environmental data categories included in the model are elevation, slope, aspect, distance to water, geology, soils, and landforms. The model assigns a probability ranking of “Survey Highly Advised: Very High Risk” for the majority of the Point Wells site with portions of the shoreline marked “Survey Contingent Upon Project Parameters: Low Risk” and the southwestern part of the project labeled “Survey Highly Advised: High Risk” (DAHP 2015). Precontact and ethnographic land use patterns suggest that Point Wells would have been an attractive landform for resource procurement activities (e.g., shellfish collection, fishing, plant gathering), resource processing, and as a landing and stopover on journeys by canoe.

Information derived from historical maps, photographs, geological borings, and other sources indicate that the landscape of the Point Wells site has been thoroughly modified by industrial development. The presence of the soil unit Urban Land (USDA NRCS 2015) in the majority of the project indicates that natural land surfaces have been altered and any archaeological deposits may have been destroyed, buried, or otherwise obscured. The surface geologic and soil units on the Upper Bench indicate that deposition during the Holocene has been minimal and any archaeological material would have been deposited near the present-day ground surface. Due to the extent of past disturbance, intact archaeological deposits are considered unlikely to be

preserved on the Upper Bench. On the Lower Bench, intact archaeological deposits may be preserved on the relict beach or pre-Fraser surfaces beneath the extent of prior fill or other disturbances.

Evidence of early historic uses of the project, such as logging and grazing, is considered unlikely to be preserved within the project. These activities could potentially have resulted in deposition of archaeological materials; such deposits could arguably be significant if they retained depositional integrity and could result in data that would inform research questions regarding facets of historical life relevant to the social, economic, or cultural development of the region. Development of the fuel terminal in the 1910s is likely to have disturbed or removed earlier historic-period features such as the road and structure shown on the 1895 topographic map or the former shipyard.

Several standing structures are present within the Point Wells site and, based upon review of county assessor records, several of these are historic (i.e. at least 50 years old) (NPS 2002; OAHF n.d.). With the exception of a boiler house built in 1991 and a bio-remediation building built in 1999, existing structures within the project date from 1915 to 1970 (Snohomish County 2015) (Table 4). These structures are associated with development of Point Wells as a regional oil and gasoline distribution center in the early to middle twentieth century.

Resources are typically defined as significant or potentially significant if they are identified as of special importance to an ethnic group or Indian tribe or if the resource is considered to meet certain eligibility criteria for local, state, or national historic registers, such as the NRHP. Based on NRHP assessment criteria developed by the National Park Service, historical significance is conveyed by properties:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. 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; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history [NPS 2002:2].

According to the NRHP guidelines, the “essential physical features” of a property must be intact for it to convey its significance, and the resource must retain its integrity, or “the ability of a property to convey its significance.” The seven aspects of integrity are:

- Location (the place where the historic property was constructed or the place where the historic event occurred);
- Design (the combination of elements that create the form, plan, space, structure, and style of a property);
- Setting (the physical environment of a historic property);

- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property);
- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory);
- Feeling (a property's expression of the aesthetic or historic sense of a particular period of time); and
- Association (the direct link between an important historic event or person and a historic property) [NPS 2002:44].

Historic structures within the Point Wells site may meet NRHP Criterion A if they can be demonstrated to be associated with significant events or historical patterns (e.g., development of fuel oil refineries and distribution networks). Results of archival review suggest that the structures are not associated with significant historical persons (Criterion B) and they do not appear to have any significant engineering or architectural features (Criterion C), nor do the remaining dock, storage tanks, and industrial buildings appear to have potential to provide information important to history (Criterion D) (NPS 2002). Review of NRHP listings for the State of Washington (DAHP 2015) indicates that fuel oil facilities dating to the early twentieth century are a rare resource type, but the remaining Standard Oil and Asiatic Oil Company/Shell Oil structures do not appear to be exemplary (NRHP 2002). Based upon county assessor records, only two structures within the Point Wells site may date to original initial oil terminal development. These are the previously recorded building on the wharf and an uninventoried training building/industrial office (see Tables 3 and 4). Most of the existing buildings were constructed in 1950 or later (see Table 4). Due to diminished integrity of design, setting, materials, and workmanship resulting from changes to the structures and their surroundings over the years, historic structures within the site may not meet eligibility criteria for listing on the NRHP.

Treaty Context

Point Wells is in the area recognized by the Washington Department of Fish and Wildlife (WDFW) as having fishing and hunting rights ceded to the signatory tribes of the Treaty of Point Elliot as part of the “usual and accustomed grounds and stations” for hunting and fishing. A large number of tribes were original signatories to the Treaty of Point Elliot. Several of these now have representation by successor tribes that combined two or more of the signatory tribes. For instance, the Tulalip Tribes are the successors for the Snohomish, Snoqualmie, Skykomish and several other allied tribes north of Point Wells (Tulalip Tribes 2014). To the south of Point Wells, the Duwamish tribe discussed above (and also a signatory to the Treaty of Point Elliot), joined with the Upper Puyallup bands (signatories to the Treaty of Medicine Creek) to become the Muckleshoot Indian Tribe. The Muckleshoot Tribe now has rights under both treaties (although only the Treaty of Point Elliot covers the geography that includes Point Wells) (Muckleshoot Indian Tribe n.d.).

The “usual and accustomed” language in the Treaty of Point Elliot is relevant to the Point Wells project in two ways. First, the tribes (or successor tribes) recognized by WDFW as having rights in the vicinity of Point Wells are the tribes that would most likely have a claim to precontact artifacts if any are found during construction of Point Wells. Second, the same tribes are also the most likely to have an interest in the pollution remediation and shoreline restoration work

necessary for the Point Wells project (and which would be addressed through a separate EIS process). Early identification and involvement of tribes with rights and/or interests in cultural resources and remediation or shoreline work will help facilitate environmental review and avoid potential project delays.

Significant Impacts

Because the Point Wells site is considered to have a low potential to contain intact archaeological deposits due to modifications from past industrial development (e.g., dredging and filling of the site), no significant impacts to archaeological sites are anticipated. No precontact or historic period archaeological sites have been identified within the site; however, there have been reported finds of precontact artifacts in the vicinity of the project area (see Tables 1 and 2; Letter from Gretchen Kaehler, DAHP, to Darryl Eastin, Snohomish County, Log: 041811-19-SN, 18 April 2011; copy on file at CRC). Significant impacts to archaeological sites could occur if development disturbs as-yet unknown archaeological sites. For example, disturbance of shell midden or other archaeological deposits currently buried beneath fill material would constitute a significant impact. Historic-period or precontact artifacts may also be encountered within fill deposits but these would be out of context and would lack integrity or significant information potential (NPS 2002); disturbance of these highly disturbed materials would not be a significant impact. Archaeological deposits at the interface between native soils and fill may have been disturbed by past development but may retain some degree of depositional integrity; disturbance of such deposits would likely be a significant impact. Significant impacts to historic sites could be generated by demolition, removal, or other physical alterations to historic structures.

Impacts Common to All Alternatives

One historic structure, a building on a dock, has been recorded within the Point Wells site. This building was recommended not eligible for the NRHP (Howard and Johnson 2011) but it has not been formally evaluated. Plans currently call for this building to be retained but it may be modified by redevelopment. Significant impacts to this structure would occur if it is determined eligible for the NRHP and redevelopment alters its character defining features or its ability to convey its historical significance. Indirect (e.g., visual, vibration) impacts may also occur but would likely be insignificant.

Approximately ¼ of the Lower Bench has previously been investigated for archaeological or historic sites in conjunction with the Brightwater project (Gillis and Larson 2006a, 2006b, 2006c; Gillis et al. 2006; Lewarch et al. 2002). These surveys were confined to the southwestern portion of the project. No archaeological sites have been recorded within the Point Wells site. Development under each of the alternatives would not generate impacts to previously recorded archaeological sites. However, the Redevelopment Project or other future development with subsurface impacts reaching beneath the depths of fill and prior disturbances (e.g., soil removal performed under remediation) could affect as-yet unknown archaeological sites. It is assumed that potential impacts associated with cleanup/remediation of the site will be analyzed through a separate review process overseen by Ecology.

Alternative 1

Under this alternative, the site would be redeveloped as a mixed-use urban center. Development would include approximately 3,081,000 square feet (sq. ft.) of residential uses (3,081 units), 32,262 sq. ft. of commercial/office uses (with space for on-site police and fire facilities), 94,300 sq. ft. of retail uses, and open space. If as-yet unrecorded archaeological sites are present within the Point Wells site, they would be buried beneath fill. Demolition, removal, or other physical alteration of any structures over 50 years old would impact historic sites. Due to diminished integrity of design, setting, materials and workmanship resulting from changes to the structures and their surroundings over the years, these historic sites may not meet eligibility for listing on the NRHP.

Alternative 2

Under this alternative, the site would be redeveloped as a mixed-use urban village. The urban village development would include the same site plan as Alternative 1. However, the maximum building height would be less. Approximately 2,600,000 sq. ft. of residential uses (2,600 units) would be provided under Alternative 2. The same amounts of commercial/office uses with space for on-site police and fire facilities (32,262 sq. ft.), retail uses (94,300 sq. ft.), and open space as Alternative 1 is assumed for Alternative 2. If as-yet unrecorded archaeological sites are present within the Point Wells site, they would be buried beneath fill. Demolition, removal, or other physical alteration of structures over 50 years old would impact historic sites. Due to diminished integrity of design, setting, materials and workmanship resulting from changes to the structures and their surroundings over the years, these historic sites may not meet eligibility for listing on the NRHP.

Alternative 3 (No Action Alternative)

Under the no action alternative, the site would remain in industrial use, with possible reuse of existing underutilized industrial facilities. The site could also be developed in the future in accordance with the uses allowed by the site's current Planned Community Business (PCB) zoning. Because no action is proposed under Alternative 3 at this time, no impacts to cultural resources would be generated. Under this alternative, there would be a continuation of existing conditions. Continued existing operations within the site would not affect any recorded cultural resources. If the site is developed in the future in accordance with its zoning, impacts on historic and cultural resources would be similar to the impacts described under Alternatives 1 and 2.

Mitigation Measures

The following mitigation measures could be implemented to help avoid and manage significant impacts to cultural resources within the Redevelopment Project:

- Initiate formal government-to-government consultation with Tribes in Washington State to determine which Tribes have an interest in the Point Wells site. Include in the EIS, and FEIS, opportunities for interested tribes to provide statements summarizing their usual and accustomed use of Point Wells and nearby waters. Coordinate these efforts with a separate, but parallel, SEPA process for remediation of contaminants on the site that will have the Washington State Department of Ecology as the SEPA lead agency.
- Document and evaluate historical significance of structures within the Point Wells site that are over 50 years old prior to redevelopment (in association with environmental review overseen by Ecology for site cleanup/remediation).

- Conduct subsurface archaeological investigations prior to construction if redevelopment is anticipated to intersect native soils (i.e. below the depth of fill and other documented prior disturbances such as remediation).
- Consider establishing a heritage program that helps guide development by incorporating a heritage theme in the new development.
- Partner with existing businesses or agencies with a strong interest in history, and which likely maintain good historical records.

Should any potentially significant archaeological or historic sites be encountered in development under the proposal and it is not possible to avoid them, impacts would be generated. These impacts could potentially be minimized through development and implementation of mitigation measures appropriate to the nature and extent of discovered sites. Mitigation measures may include one or more of the following:

- Limiting the magnitude of the proposed work;
- Modifying proposed development through redesign or reorientation to minimize or avoid further impacts to resources;
- Rehabilitation, restoration, or repair of affected resources;
- Preserving and maintaining operations for any involved significant historic structures;
- Archaeological monitoring, testing, or data recovery excavations;
- Documentation of historic elements of the built environment through photographs, drawings and narrative, at the appropriate level based upon Department of Archaeology and Historic Preservation standards (DAHP 2010).

In the event that ground disturbing or other activities do result in the inadvertent discovery of archaeological deposits, work should be halted in the immediate area and contact made with the DAHP in Olympia. Work should be halted until such time as further investigation and appropriate consultation is concluded. In the unlikely event of the inadvertent discovery of human remains, work should be immediately halted in the area, the discovery covered and secured against further disturbance, and contact effected with law enforcement personnel, consistent with the provisions set forth in RCW 27.44.055 and RCW 68.60.055.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to cultural resources are anticipated to be generated by the proposal. By implementing the mitigation measures recommended above, it should be possible to prevent any significant unavoidable impacts. Should any potentially significant archaeological or historic sites be discovered and it is not possible to avoid them, impacts would be generated. However, it is expected that these impacts could potentially be minimized through development and implementation of additional mitigation measures appropriate to the nature and extent of discovered sites.

Limitations of this Assessment

No cultural resources study can wholly eliminate uncertainty regarding the potential for prehistoric sites, historic properties or Traditional Cultural Properties (TCPs) to be associated with a project. The information presented in this report is based on professional opinions derived from our analysis and interpretation of available documents, records, literature, and information

identified in this report, and on our field investigation and observations as described herein. Conclusions and recommendations presented apply to project conditions existing at the time of our study and those reasonably foreseeable. The data, conclusions, and interpretations in this report should not be construed as a warranty of subsurface conditions described in this report. They cannot necessarily apply to site changes of which CRC is not aware and has not had the opportunity to evaluate.

It should be recognized that this assessment was not intended to be a definitive investigation of potential cultural resources concerns within the project area. Within the limitations of scope, schedule and budget, our analyses, conclusions and recommendations were prepared in accordance with generally accepted cultural resources management principles and practice in this area at the time the report was prepared. We make no other warranty, either express or implied. These conditions and recommendations were based on our understanding of the project as described in this report and the site conditions as observed at the time of our site visit.

This report was prepared by CRC for the sole use of EA. Our conclusions and recommendations are intended exclusively for the purpose outlined herein and the project indicated. The scope of services performed in execution of this investigation may not be appropriate to satisfy the needs of other users, and any use or re-use of this document, including findings, conclusions, and/or recommendations, is at the sole risk of said user. If there is a substantial lapse of time between the submission of this report and the start of construction, or if conditions have changed due to project (re)design, or appear to be different from those described in this report, CRC should be notified so that we can review our report to determine the applicability of the conclusions and recommendations considering the changed conditions.

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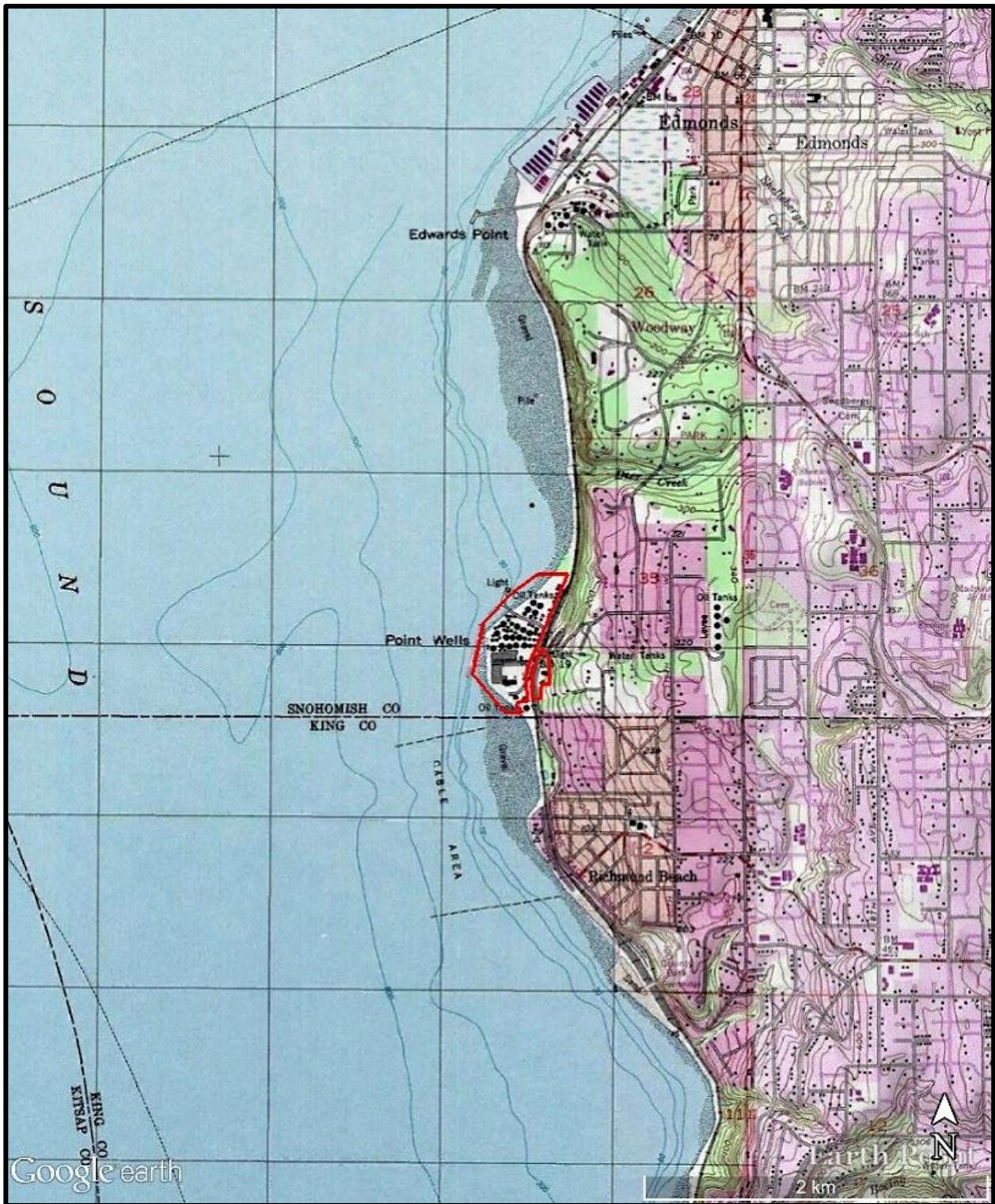


Figure 1. Point Wells site marked on portion of Edmonds West, WA (USGS 1997) 7.5-Minute topographic quadrangle.

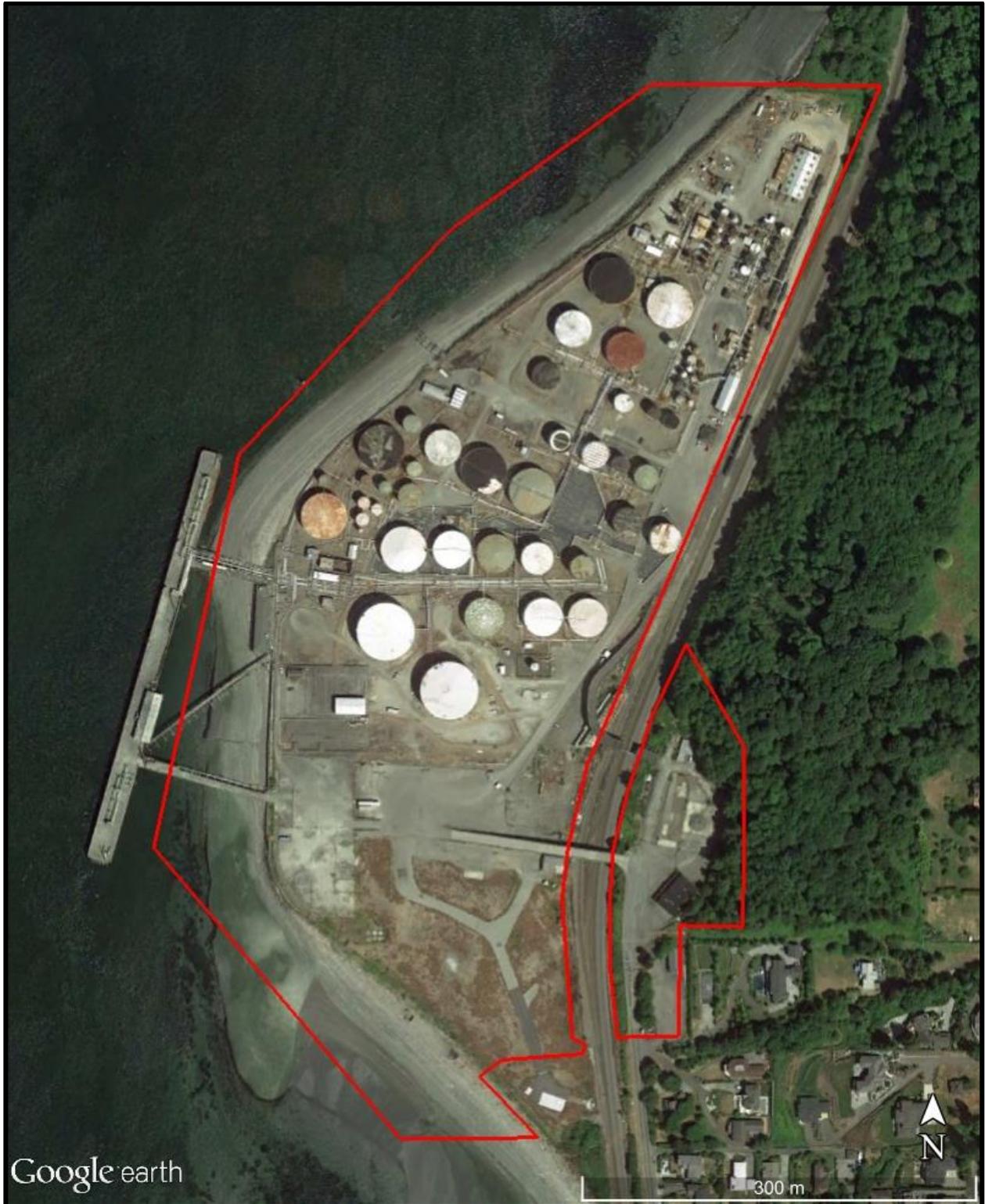


Figure 2. 2014 aerial imagery marked with EIS boundary (base map: Google Earth).

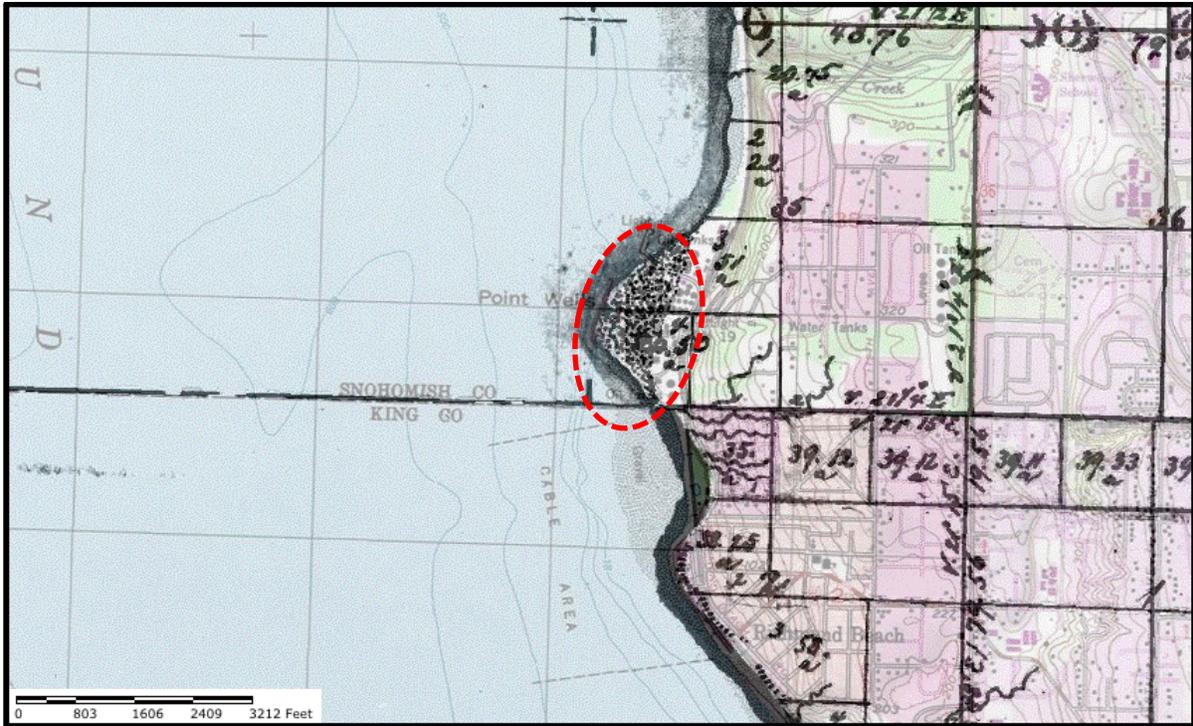


Figure 3. Project vicinity marked on georeferenced cadastral survey map (DAHP 2015; USSG 1860).

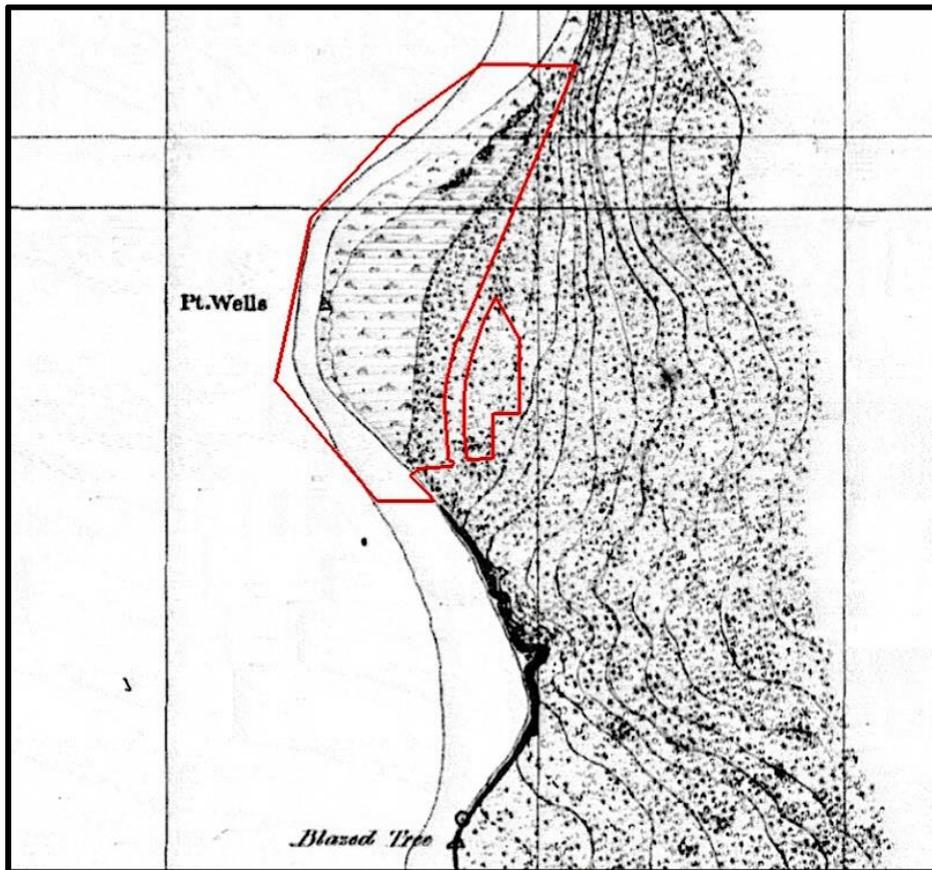


Figure 4. Project area marked on georeferenced historical topographic sheet (Fox 2009; USCS 1874).



Figure 5. 1977 air photo of the project area (Washington Department of Ecology 2014a).



Figure 6. 2006 air photo of the project area (Washington Department of Ecology 2014b). Several tanks, a few buildings, and a dock were removed in the late twentieth century.

Table 1. Reports of cultural resources investigations on file at DAHP within a distance of approximately one mile from the Point Wells site.

Author	Date	Title	Results and Recommendations
Copass	1996	Historic Resources Survey and Inventory Update for the City of Shoreline with Appendix A, Overview of Shoreline History	Identified and inventoried 59 historic sites and two historic district to supplement a prior historic resources survey completed in 1978. Inventoried property nearest to the project was Dalby House (2115 NW 199th St) built 1891/1935. Includes historical overview of Shoreline area.
Demuth	1998	Historic, Cultural, and Archaeological Resources Assessment for Everett-to-Seattle Commuter Rail Project Environmental Impact Statement	Provided cultural resources overview of rail corridor and station locations between Everett and Seattle, and evaluated commuter rail project alternatives for potential impacts to cultural resources. No archaeological or historic sites identified in the location of the current project.
Lewarch et al.	2002	Cultural Resources Assessment Brightwater Treatment Facility and Conveyance System	Evaluated alternatives for wastewater treatment system. Assessment included background research, reconnaissance survey, and monitoring of geotechnical borings. No archaeological or historic sites identified near current project.
Boyle	2004	A Historic Survey of Downtown Edmonds	Presented a historical overview of the City of Edmonds. Inventoried 83 historic buildings in the City of Edmonds. No historic sites inventoried in the current project. Inventoried property nearest to the project was the Great Northern Railway Section Foreman's House (1011 2nd Ave S) built in 1917.
King County	2004	Cultural Resources Documents Prepared for the Brightwater Regional Wastewater Treatment System	Includes Cultural Resources chapter from EIS, Historic Buildings and Structures technical report, and Cultural Resources Assessment report. Sidescan sonar survey of the shoreline near the southwest edge of the current project was recommended to identify shipwrecks. Development of archaeological treatment and monitoring plans recommended to mitigate potential effects to as-yet unknown archaeological sites. Inventory and evaluation of historic buildings recommended prior to construction.
Gillis et al.	2006	Brightwater Conveyance Final Design Archaeological Resources Monitoring and Review of Geotechnical Borings and Test Pit Monitoring	Archaeological monitoring of 3 borings at Point Wells did not locate any archaeological sites. Geomorphological data were used to assess probability for as-yet unknown sites in sampled areas. Tidal marsh margins and old beach surfaces were considered high probability for archaeological sites. Archaeological monitoring of ground disturbing work intersecting old beach deposits recommended.
Gillis and Larson	2006	Final Brightwater Conveyance Final Design Portals Field Reconnaissance	Background research, pedestrian survey, and shovel and auger probes did not identify any archaeological or historic sites. However, investigations did not reach native surfaces. Additional testing (e.g., drilled borings) recommended.
Gillis and Larson	2006	Final Archaeological Monitoring of Additional Borings at the Marine Outfall Connector at Point Wells for the Brightwater Project	Archaeological monitoring of nine borings at Point Wells did not identify any evidence of archaeological sites. Archaeological monitoring recommended for any construction excavations that allow for the observation of subsurface matrices with a moderate to high probability for archaeological resources such as older beach deposits.
Gillis and Larson	2006	Final Brightwater Conveyance Final Design Additional Properties Field Reconnaissance Addendum	Reconnaissance survey did not identify any archaeological sites at Point Wells. No further work recommended because the staging area was not expected to involve any disturbance that would exceed the depth of fill.

Author	Date	Title	Results and Recommendations
Juell	2006	Archaeological Site Assessment of Sound Transit's Sounder: Everett-to-Seattle Commuter Rail System, King and Snohomish Counties, Washington	Survey identified many areas of thick fill deposits, ballast, and steep side slopes; no further work recommended in these areas. Subsurface testing and/or monitoring of trench excavation were recommended in select locations where construction would reach native soils.
Lewarch et al.	2006	Brightwater Regional Wastewater Treatment System, Archaeological Resources Treatment and Monitoring Plans	Outlines research questions that could be answered by as-yet unidentified archaeological sites, describes potential methods for evaluative testing and data recovery, and outlines data analysis, management, reporting, and curation. Includes archaeological monitoring plan to be used during construction.
Gill	2008	Archaeological Assessment of the Richmond Beach Saltwater Park Improvements Project	Background research and pedestrian survey did not identify any archaeological or historic sites. No further work recommended.
Shong and Miss	2010	Results of Archaeological Monitoring for the Deer Creek Culvert Extension Project, Snohomish County, Washington	Archaeological monitoring was conducted during construction of drainage improvements. Excavated trenches and sediments were examined but no archaeological material was found. Sediments encountered consisted of displaced glaciolacustrine material (i.e. landslide deposits) and dredge spoils. No further work recommended.
Johnson	2011	City of Edmonds Historic Resources Survey – 2011	Conducted a supplemental survey of historic structures in Edmonds. Inventoried 122 properties and made recommendations for further research about 42 properties meeting local landmark criteria.

Table 2. Archaeological sites recorded within a distance of approximately two miles from the project on file at DAHP.

Site Number	Site Name	Site Type	Distance from Project	Historic Register Status	Potential Impacts
45SN310	Deer Creek Hatchery Shell Scatter	Precontact shell midden	1.5 miles NNE	Unevaluated.	None.
45SN531	Seattle-Everett Interurban Lake Ballinger Segment	Historic railroad properties	2.8 miles E	Recommended not eligible for NRHP.	None.
45SN574	Edmonds Station	Historic debris scatter / concentration, historic structure unknown	1.9 miles NNE	Recommended eligible for NRHP.	None.

Table 3. Historic structures previously inventoried within approximately 1/4 mile from the project.

Address	Built Date	Historic Function	Historic Register Status	Potential Impacts
20500 Point Wells Rd, Edmonds	Unknown	Industry / Processing / Extraction – Processing Site	Recommended not eligible for NRHP (ACI 2011b). Site significance has not been formally evaluated.	If determined eligible for NRHP, redevelopment could generate significant direct (e.g., demolition or other physical alteration to the structure) or indirect (e.g., visual, vibration) impacts.
24300 116 th Ave W, Woodway	1890	Domestic - Single Family House	Unevaluated.	None.

Address	Built Date	Historic Function	Historic Register Status	Potential Impacts
24420 11 th Ave W, Edmonds	1931	Domestic - Single Family House	Unevaluated.	None.
24302 116 th Ave W, Woodway	1969	Domestic - Single Family House	Unevaluated.	None.
20450 Richmond Beach Dr NW, Woodway	1915	Domestic - Single Family House	Unevaluated.	None.
20424 25 th Ave NW, Shoreline	1957	Domestic - Single Family House	Unevaluated.	None.
2614 NW 202 nd St, Shoreline	1904	Domestic - Single Family House	Unevaluated.	None.
20416 Richmond Beach Dr NW, Shoreline	1955	Domestic - Single Family House	Unevaluated.	None.
2415 NW 205 th St, Shoreline	1959	Domestic - Single Family House	Unevaluated.	None.
24018 25 th Ave NW, Shoreline	1961	Domestic - Single Family House	Unevaluated.	None.
2405 NW 205 th St, Shoreline	1959	Domestic - Single Family House	Unevaluated.	None.
2508 NW 202 nd St, Shoreline	1962	Domestic - Single Family House	Unevaluated.	None.
2627 NW 204 th St, Shoreline	1922	Domestic - Single Family House	Unevaluated.	None.
2621 NW 205 th St, Shoreline	1951	Domestic - Single Family House	Unevaluated.	None.
2512 NW 202 nd St, Shoreline	1968	Domestic - Single Family House	Unevaluated.	None.
20420 Richmond Beach Dr NW, Shoreline	1955	Domestic - Single Family House	Unevaluated.	None.
20146 25 th Ave NW, Shoreline	1969	Domestic - Single Family House	Unevaluated.	None.
20128 Olympic Ave, Shoreline	1949	Domestic - Single Family House	Unevaluated.	None.
20405 25 th Ave NW, Shoreline	1956 (1996 remodel)	Domestic - Single Family House	Unevaluated.	None.
20155 24 th Ave NW, Shoreline	1967	Domestic - Single Family House	Unevaluated.	None.
2504 NW 202 nd St, Shoreline	1967	Domestic - Single Family House	Unevaluated.	None.
20145 24 th Ave NW, Shoreline	1967	Domestic - Single Family House	Unevaluated.	None.

Table 4. Uninventoried historic structures within the Point Wells site. This includes structures that will be 50 years of age and therefore considered historic within the anticipated development period (2015-2035).

Parcel (s)	Address	Built Date	Structure Type	Use
27033500304300	24233 Richmond Beach Dr, Edmonds	1970 (1985 addition)	Truck repair garage	Service (repair) garage
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1965	Sales office	Unknown
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1957	Conveyor building	Storage

Parcel (s)	Address	Built Date	Structure Type	Use
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1956	Warehouse	Unknown
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1955	Dock warehouse	Storage
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1955	Dock office	Industrial office
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1951	Shed	Storage
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1950	Scale house / Office	General office
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1950	Control building	Industrial office
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1950	Break room / Warehouse	Storage
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1941	Locker rooms	Storage
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1939 (1972 addition)	Main pier office	General office
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1930	Maintenance shop	Storage
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1928	Maintenance / Machine shop	Unknown
27033500301200	20500 Richmond Beach Dr NW, Edmonds	1915	Training building	Industrial office