CULTURAL RESOURCES REPORT COVER SHEET

DAHP Project Number: 2023-12-08337

Author: Robert Kopperl and F. Scott Pierson

Title of Report: Cultural Resources Assessment for the Habitat for Humanity Sequim Project, Sequim, Washington

Date of Report: April 19, 2024

County(ies): Clallam Section: 29 Township: 30N Range: 3W

Quad: *Sequim, WA* Acres: 6.52

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 #:

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Cultural Resources Assessment for the Habitat for Humanity Sequim Project, Clallam County, Washington

Cultural Resources Assessment for the Habitat for Humanity Sequim Project, Sequim, Washington

Prepared by
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F. Scott Pierson, B.A.

April 19, 2024

WillametteCRA Report No. 24-43
Seattle, Washington

Prepared for
Habitat for Humanity Clallam County
Port Angeles, Washington

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Report Details

Project Name:	Habitat for Humanity Sequim Project
DAHP Number:	2023-12-08337
Agency:	City of Sequim
Agency Project Number:	BSP/CUP-23-003
Client:	Habitat for Humanity Clallam County
Project Undertaking:	Affordable Housing Development
Regulatory Framework:	SEPA
County:	Clallam
Legal Description:	Township 30 N, Range 3 W, Section 29
Tax Parcel:	#033029229020
USGS Quad(s):	*Sequim, WA* 7.5-minute
Project Acreage:	6.52
Survey Acreage:	6.52
Field Note Location:	WillametteCRA, Seattle Office
Fieldwork Type:	Pedestrian Survey, Shovel Probes
Fieldwork Dates:	March 13, 2024
Field Personnel:	F. Scott Pierson, Althea Fitzpow
Findings:	No archaeological material observed
Recommendations:	Inadvertent Discovery Plan implemented for construction.

Executive Summary

Habitat for Humanity of Clallam County (HfH) is planning construction of affordable housing on approximately 6.5 acres of land within the city limits of Sequim, Clallam County, Washington (Project). As part of State Environmental Policy Act (SEPA) compliance, the City of Sequim submitted HfH's environmental permitting application to various reviewers. Both the Jamestown S'Klallam Tribe (JST) and the Washington State Department of Archaeology and Historic Preservation (DAHP) replied in separate letters with requests for a cultural resources survey of the Project parcel. Both JST and DAHP noted that a known and highly significant archaeological site, the Sequim Bypass Site (45CA426), is immediately adjacent to the Project parcel with uncertain site boundaries at this southeast edge of the archaeological deposits. Willamette Cultural Resources Associates, Ltd. (WillametteCRA) was contracted by HfH to complete this assessment.

An earlier cultural resources assessment was completed in 2009-2010 on the same parcel for a previously proposed development project that was abandoned. Our fieldwork was completed on March 13, 2024, filling in some gaps in spatial coverage. Pedestrian survey transects were completed where ground visibility was ideal to update documentation of existing surface conditions in the intervening 14 years. Ten shovel probes were excavated between the locations of the mechanical test pits excavated for the previous survey where gaps were identified.

No archaeological or otherwise significant cultural resources were identified in either assessment. Substantial twentieth century anthropogenic disturbances, including ground clearing, cultivation, and highway construction, have largely removed the near-surface sediments that formerly composed the natural ground surface here. Neither the previous study or the present study within the current project parcel found evidence that the archaeological deposits extended this far south, or if they did they are now gone. No further identification efforts or other archaeological management measures such as construction monitoring are recommended. We do recommend, however, an Inadvertent Discovery Plan (IDP) to be drafted and implemented by the HfH.

Acknowledgments

We would like to thank Habitat for Humanity of Clallam County, especially Ann Jagger, for providing us with the opportunity to assist them with this project. Allie Taylor, JST THPO, graciously shared cultural information about the immediate vicinity of the project as well as Klallam traditional use and placenames from the broader Dungeness fan-delta landscape. Dr. Lance Wollwage, DAHP State Archaeologist, provided feedback useful context for this project as we began our assessment. We couldn't have accomplished it without them.

Table of Contents

Introduction 1
Project Location and Description 1
Regulatory Context 4
Natural Setting 6
Geology and Geomorphology of the Lower Dungeness 6
Ecology and Biota 12
Cultural Setting 14
Precontact Archaeology 14
Traditional Klallam Lifeways 16
Postcontact Land Use History 17
Previous Archaeology 22
Archaeological Study of the Sequim Bypass Site 27
Previous Archaeological Survey of the Project Parcel 30
Expectations for Cultural Resources 31
Field Methods 32
Results 33
Existing Surface Conditions 33
Subsurface Shovel Probes 33
Conclusions and Recommendations 38
References Cited 39
Appendix A: Previous SEPA Review Cultural Resources Correspondence
Appendix B: Shovel Probe Table

List of Figures

Figure 1. Project location. 2
Figure 2. Project and vicinity. 3
Figure 3. Preliminary Project design (courtesy of Habitat for Humanity of Clallam County). 5
Figure 4. Topography of the Project vicinity and eastern Dungeness delta and coastal plain. 7
Figure 5. Modern mapped surface geology of Project vicinity.....9
Figure 6. Persistence of land use between mid- and late-20th century seen in aerial imagery. .11
Figure 7. Portion of GLO cadastral survey map near Project, 1859.....18
Figure 8. Portion of US Army Corps survey map from 1909, including Project area. 20
Figure 9. Clallam County assessor map for the legal section including the Project Area, 1914. 21
Figure 10. Comparison of Project vicinity between 1921 and 1928 Kroll property atlases. 23
Figure 11. Comparison of Project vicinity between 1939 and 1956 USGS topographic maps. ..24
Figure 12. 1995 site boundary of 45CA426 and 2009/2010 project mechanical test trenches. ..28
Figure 13. Data recovery excavations at 45CA426 in relation to HfH Project area. 29
Figure 14. WillametteCRA shovel probe excavation locations, relative to previous CRC work. .35
Figure 15. Overview from southeast corner of the Project Parcel.. 36
Figure 16. Ditched catch drain/associated concrete vault along the E edge of Project Parcel.. .36
Figure 17. SP 7 profile with saturated sediment. 37
Figure 18. SP 4 profile showing typical stratigraphy observed during the subsurface survey. ...37

List of Tables

Table 1. Previous Cultural Resource Investigations Within 1 Mile of APE. 25
Table 2. Previously Recorded Archaeological Sites Within 1 Mile of APE. 26

Introduction

Habitat for Humanity of Clallam County (HfH) is planning construction of affordable housing on approximately 6.5 acres of land within the city limits of Sequim, Clallam County, Washington (Project). As part of State Environmental Policy Act (SEPA) compliance, the City of Sequim (City) submitted HfH's environmental permitting application to various reviewers. Both the Jamestown S'Klallam Tribe (JST) and the Washington State Department of Archaeology and Historic Preservation (DAHP) replied on December 20, 2023, in separate letters with requests for a cultural resources survey of the Project parcel (Appendix A). Both JST and DAHP noted that a known archaeological site eligible for listing in the National Register of Historic Places (NRHP), the Sequim Bypass Site (45CA426), is immediately adjacent to the Project parcel with uncertain site boundaries at this southeast edge of the archaeological deposits.

Willamette Cultural Resources Associates, Ltd. (WillametteCRA) was contracted by HfH to complete this assessment, the results of which are presented in this report. Included here are sections on the natural and cultural setting of the Project and a summary of previous cultural resources studies completed within and nearby; our pre-fieldwork expectations derived from that information; the methods and results of our field survey; and recommendations regarding further archaeological management measures that should be implemented during Project construction.

Our fieldwork was completed on March 13, 2024, filling in some gaps in spatial coverage by an earlier cultural resources assessment on the same parcel for a previously proposed development project that was abandoned (Berger 2010). Pedestrian survey transects were completed where ground visibility was ideal to update documentation of existing surface conditions in the intervening 14 years, and shovel probes were excavated between mechanical test pits excavated for the previous survey where gaps were identified. Our survey did not observe buried or surficial cultural resources.

Project Location and Description

The Project is situated on Clallam County tax parcel 033029229020 on the southeast corner of the intersection of S Sequim Ave and E Brownfield Rd within the Sequim city limits and on the south side of US 101 (Figure 1). The project is in the NW ¼ NW ¼ of Section 29 of Township 30 North, Range 3 West, Willamette Meridian on the gently sloping hillside drained by Bell Creek at the base of the Dungeness River delta (Figure 2). The parcel composes the majority of what was historically a 10-acre cultivated property at the above-noted intersection, which was subdivided in the late 1990s for construction of a new bypass and interchange for US 101, moving Brownfield Rd to bisect that 10-acre property. The current Project only includes the ~6.5-acre parcel on the south side of Brownfield Rd, with ownership listed in county assessor's records as the LLC of HfH – Miller Road Property Sequim. No structures are currently standing on the property.

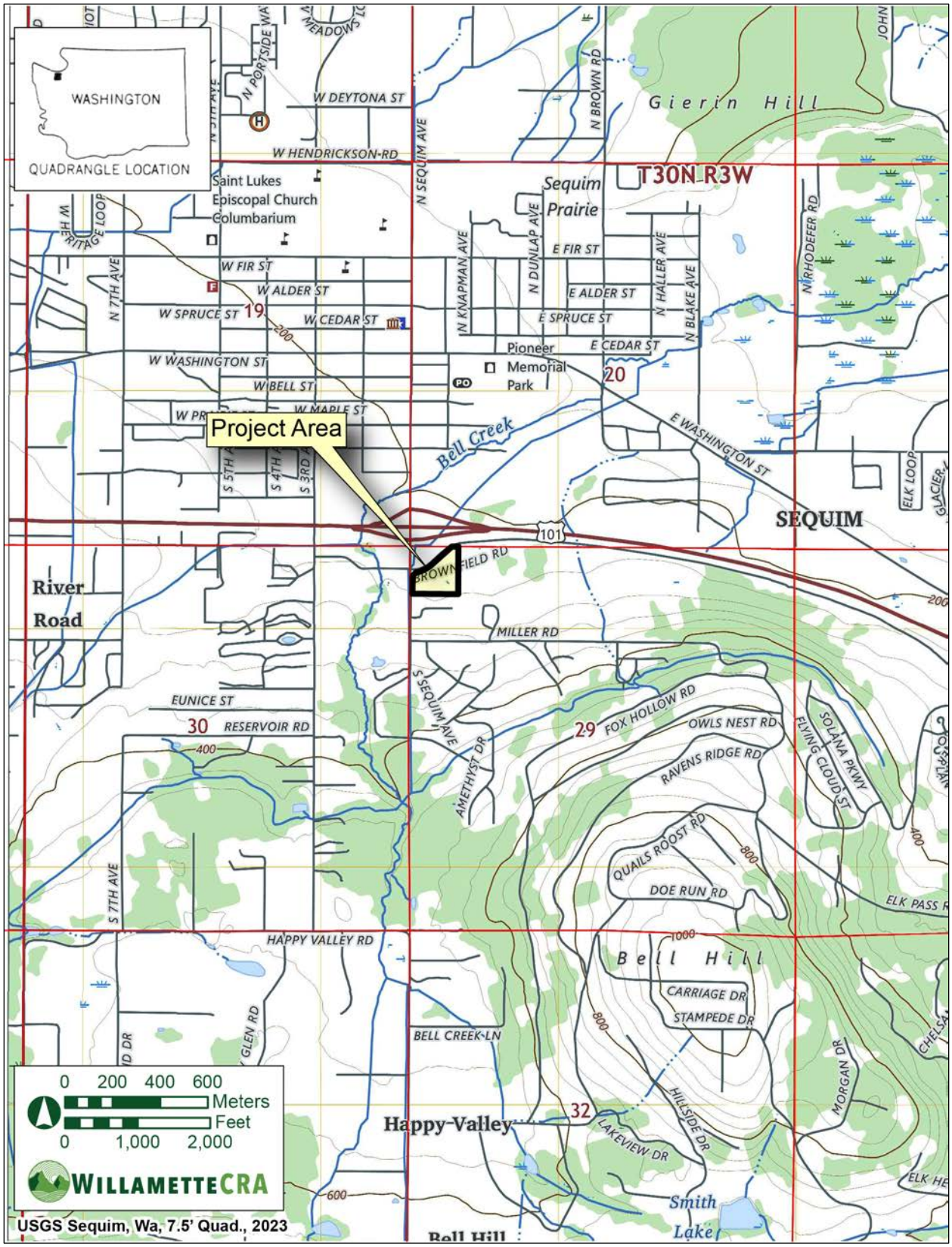


Figure 1. Project location.



Figure 2. Project and vicinity.

Figure 3 shows preliminary a Project plan dated October 2023 and provided to WillametteCRA in January 2024. A total of 15 residential units along a single access road bisecting the parcel are planned. They are anticipated to be built on footings with a typical shallow (approximately 3-foot depth) crawlspace underneath without sub-grade basement or parking. Other anticipated ground disturbance is limited to an infiltration pond with maximum depth of 3 feet and stormwater catch basin depth of 7 feet below surface (fbs). Buried utilities are planned as well, with as-yet undetermined depths.

Regulatory Context

This cultural resources investigation was conducted pursuant to Washington State environmental and historic preservation regulations, at the request of DAHP and JST. SEPA requires project proponents, in this case HfH, to identify any places or objects on or adjacent to the project that are listed in, or eligible for, national, state, or local preservation registers, and to identify sites of archaeological, scientific, or cultural importance in or adjacent to the project. Project proponents are required to describe proposed measures to reduce or control impacts to those places, objects, and sites. As noted above, the City is the permitting agency with SEPA responsibility for this Project (#BSP/CUP-23-003), and DAHP is the state agency with technical expertise regarding cultural resources aspects of SEPA compliance. The Project was given a DAHP project number, 2023-12-08337, at the time of their review. Affected Tribes are also consulted during the SEPA review process, which included JST.

Pertinent state historic preservation regulations include the Washington State Archaeological Sites and Resources Act (RCW 27.53), which requires a permit from the Washington State DAHP prior to excavation of or disturbance to known archaeological resources, and any such resources identified during the course of Project construction must be treated and consulted upon in a manner compliant with RCW 27.53. Other potentially pertinent state regulations include the Indian Graves and Records Act (RCW 27.44), Human Remains Regulations (RCW 68.50), and the Abandoned and Historic Cemeteries and Historic Graves Act (RCW 68.60).

WillametteCRA contacted both DAHP State Archaeologist Dr. Lance Wollwage and JST Tribal Historic Preservation Officer Allie Taylor by email and phone call at the start of our assessment to determine their specific concerns and integrate them into our background research and field methodology. The proximity of 45CA426 is the primary concern of both DAHP and JST, along with the lack of information regarding potentially how far into the Project parcel the archaeological deposits may extend considering the horizontal limits of archaeological study before the US 101 interchange was built. The general cultural and archaeological sensitivity of this delta landform along the lower Dungeness River suggested the Project vicinity beyond the recorded limits of 45CA426 continued to be a concern.

confidential—not for general distribution

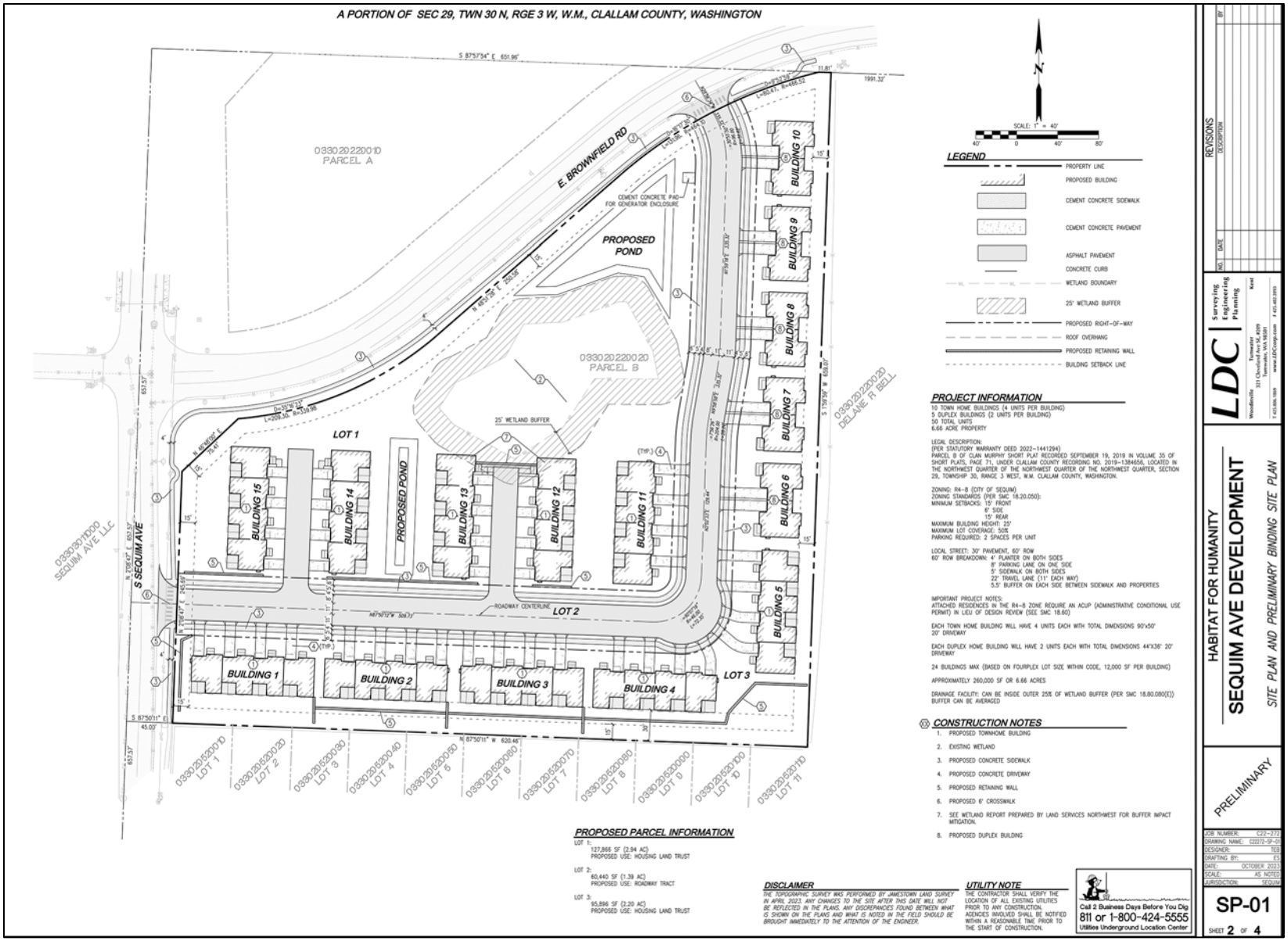


Figure 3. Preliminary Project design (courtesy of Habitat for Humanity of Clallam County).

Natural Setting

The modern landscape of the Olympic Peninsula is diverse and characterized by landforms and sediments produced across multiple spatial and temporal scales in glacial and deglacial environments – many of which are found in the Project vicinity. Some of the physical features associated with earlier glacial and deglacial conditions are still readily visible. Other landscape features are the products of much more recent Holocene geomorphic processes, and still others are the product of anthropogenic processes such as land clearing, farming, and recontouring the natural topography of the area for road construction.

The natural setting of a particular place on the landscape may limit or promote human habitation and resource use, which in turn allows an assessment of the sensitivity of this area for archaeological remnants of past human activity. The geological setting and history, specifically, inform us of the age and potential depth of archaeological remains that may still be found here, and places where archaeological deposits may still be preserved or eroded. The ecological setting informs us of potential resources that may have drawn people to this place in the past and the kinds of cultural resources that may be expected.

Geology and Geomorphology of the Lower Dungeness

The Project is situated along the southeast edge of the Dungeness River delta in the northeast corner of the Olympic Peninsula, where the lower slopes of the foothills and deltaic plain fronting the Olympic Mountains meet the Strait of Juan de Fuca. The Project parcel is at the northwest toe-edge of Bell Hill, an isolated knob of pre-Pleistocene basalt and sandstone bedrock over 1,000 feet in elevation above sea level (fasl) separated from the foothill front by Happy Valley (Figure 4). The parcel is on gently rolling land between about 230 and 215 fasl, drained by Bell Creek less than 400 feet to the west. The Dungeness River emerges from the foothills onto its delta just over 2 miles west of the Project. The nearest tidewater is Sequim Bay about 2.5 miles to the east.

The last Pleistocene glaciation in the Pacific Northwest, called the Vashon Stade of the Fraser Glaciation, fostered glaciers that originated in the mountains of British Columbia and coalesced and spread southward as the broad continental Cordilleran ice sheet (e.g., Booth and Goldstein 1994; Booth et al. 2004). Reaching the Olympic Peninsula, the ice sheet separated into the Puget lobe, which continued south into the Puget Lowland, and the Juan de Fuca lobe, which extended west into the Strait of Juan de Fuca north of the Olympic Mountains. More erosion-resistant bedrock such as Bell Hill were scoured but remained in places along the margins of these lobes, which reached their maximum extent between about 14,000 and 15,000 years ago. The lobes of ice rapidly retreated, and less than a few thousand years later the meltwater impounded by the retreating ice lobes began draining to the Pacific Ocean through the Strait of Juan de Fuca. The Juan de Fuca lobe probably receded at a faster rate than the Puget lobe due to rising global sea levels and isostatic rebound of the newly exposed land when the weight of

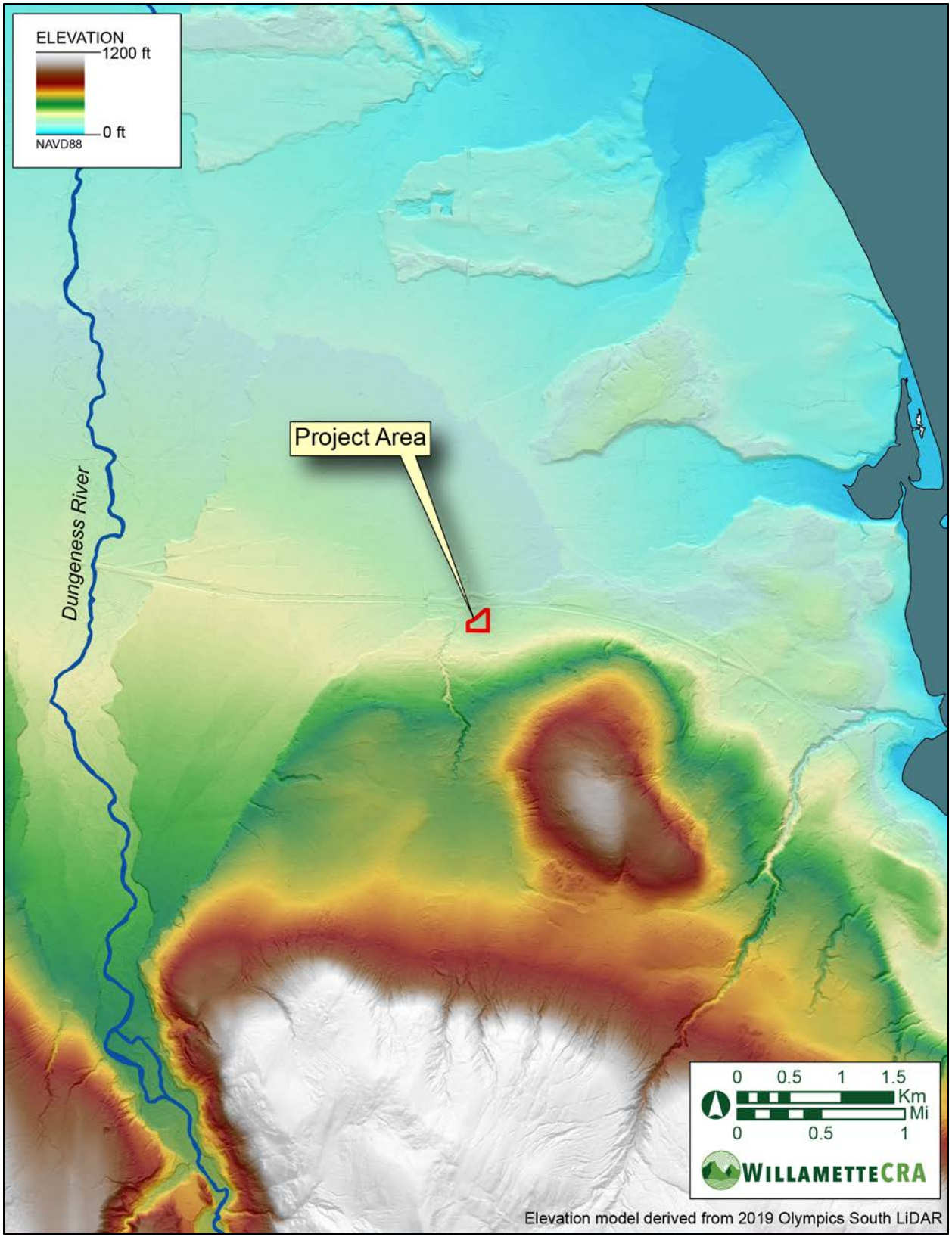


Figure 4. Topography of the Project vicinity and eastern Dungeness delta and coastal plain.

the ice was removed (Dethier et al. 1995; Kovanen and Slaymaker 2004; Mosher and Hewitt 2004; Porter and Swanson 1998).

When the ice sheets began retreating, global sea level, which had been considerably lowered during the glacial maximum extent because of the tremendous amounts of water locked up in the ice sheets, began to rise. Initial rates of sea level rise were rapid—between 13,000 and 6,000 years ago, sea level rose from about 390 feet below present sea level (bpsl) to about 30 feet bpsl. After 6,000 years ago the rate of sea level rise slowed so that by 5,700 years ago sea level was about 16 feet bpsl (Dragovich et al. 1994). The timing and rate of relative sea level change along the shores of the Strait of Juan de Fuca create a complex pattern, shaped by global melting of continental ice sheets as Earth's climate warmed at the end of the Pleistocene, and very much more localized isostatic rebound following retreat of ice that varied in thickness and, therefore, weight. Global sea level rise and local isostatic rebound outpaced each other at different times, resulting in the marine terraces and large deltaic landforms seen along the northeast corner of the Olympic Peninsula today around Sequim and Port Angeles.

The large fan-delta at the mouth of the Dungeness River is one of the most notable deltaic landforms in Washington State. It formed after the final retreat of continental ice after about 12,000 years ago and stabilization of sea level during subsequent 5–6,000 years (Collins 2005:4–5). The Project is east of the lateral edge of the present-day Dungeness River mainstem and braided side-channels where the river leaves the higher elevations and bedrock outcrops of the foothills of the Olympic Mountains. Earlier iterations of the lower Dungeness River created, incised, and then abandoned other paleochannels that include present-day Bell Creek, which was abandoned by the Dungeness River by about 6,700 years ago (Collins 2005:4–6; Morgan 1999).

The vicinity of the Project is on one of the geologically older portions of the broader fan-delta formation where older terraces are more well-defined. Figure 4 clearly shows the Project at the norther terminus of the older deltaic landform with its gently rolling topography surrounding Bell Hill (Collins 2005; Rot and Edens 2008). Geologically, the toe-edge of the older delta landform would have been advantageous for human settlement during the early Holocene as a place with slight elevation above ideal hunting grounds along the growing alluvial coastal plain, easy access via the Dungeness River valley to hunting and gathering areas the uplands and mountains to the south, and marine resources that would have been much closer to the Project vicinity before sea level stabilization by the mid-Holocene, as attested to by the location of the Sequim Bypass Site, 45CA426 (Morgan 1999).

The modern natural surface geology of the Project property (Figure 5) is composed of Late Pleistocene (Vashon Stade) till deposits (Qgt_v) that mantle the lower flanks of Bell Hill, which is composed of Oligocene-Eocene sandstone (ΦEm_m) and basalt (Ev_c). The till was deposited between about 14,500 and 17,5000 years ago and extends north to the Project parcel and the present-day Sequim Bypass. It is characterized on the typical gently rolling modern surface of

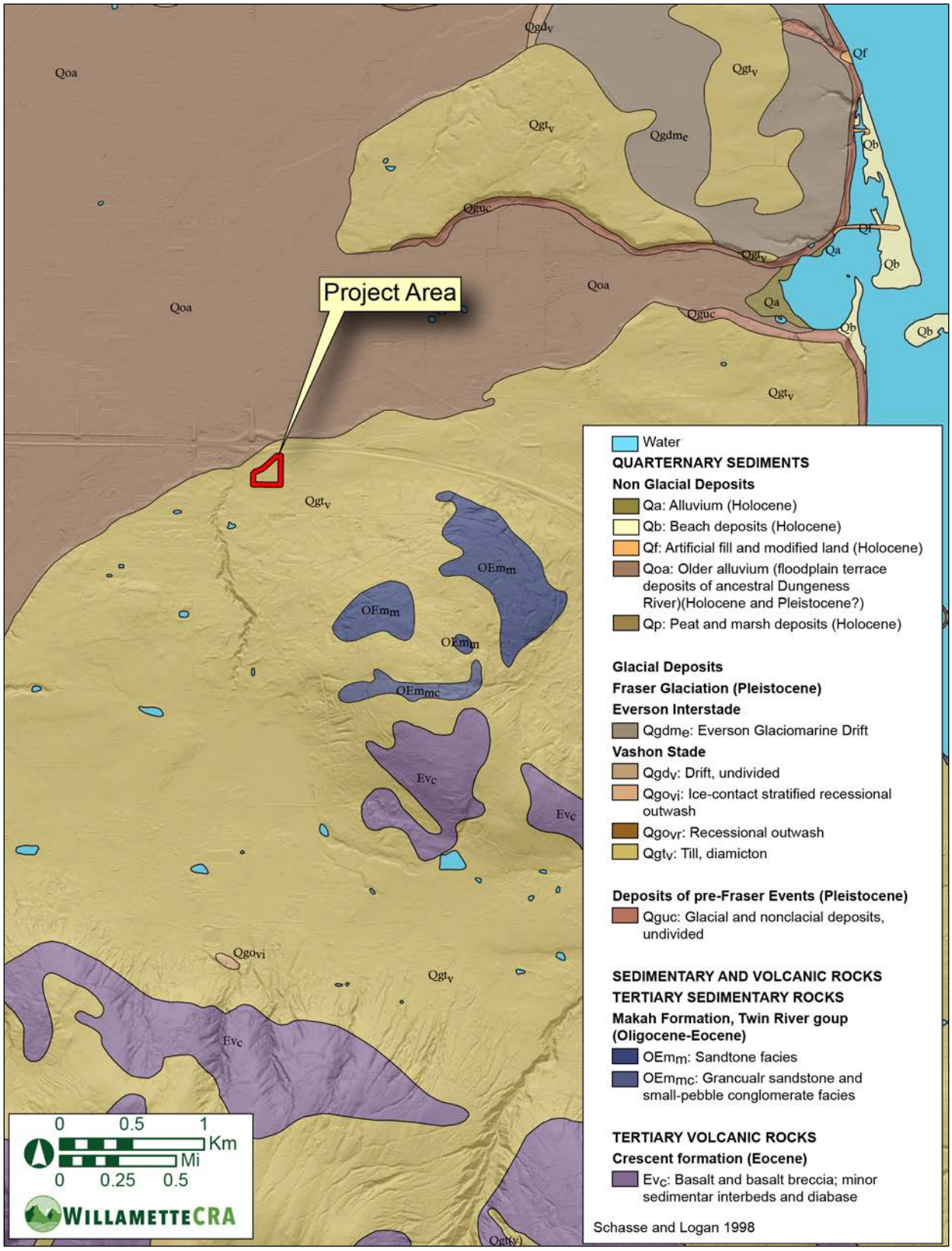


Figure 5. Modern mapped surface geology of Project vicinity.

this landform as a compact diamicton sediment composed of poorly sorted pebbles, clay, sandy silt, cobbles, and boulders. The modern surface geology abruptly transitions immediately north of the US 101 bypass to more recent Holocene alluvial deposits that continue several miles north, east, and west to the shoreline landforms of the present-day Dungeness fan-delta margins (Schasse and Logan 1998). Essentially, the surface of the immediate Project vicinity represents the same kind of surfaces on which people, plants, and animals would have existed since the end of the last Ice Age.

As a relatively stable surface over the past millennia, at least until the arrival of European American settlers, the Project has been subjected to natural weathering and soil formation of the ground surface and modern anthropogenic activities that recontoured portions of the landscape. Soils mapped here reflect their geological histories, and the transition from Late Pleistocene till to Holocene alluvium is mapped as a transition at the US 101 interchange from Clallam gravelly sandy loam that covers most of the Project parcel to Sequim very gravelly sandy loam. Clallam gravelly sandy loam forms a relatively shallow soil A horizon in a parent material of glacial till and is considered prime farmland if irrigated. Roughly the southern third of the Project property has been mapped as Yearly gravelly loam, which generally has the same soil characteristics as the Clallam loam series except somewhat shallower soil A horizon formation (Halloin 1987).

Near the Project, historic and modern anthropogenic disturbances include widespread logging of the entire area; early construction and periodic improvement of a network of county roads; cultivation of cleared land with crops and pasturing for livestock; development of canals and side-ditches to irrigate this farmland; major rerouting of US 101 to bypass the edge of downtown Sequim as it grew; and growing residential development at the outskirts of Sequim. Collins (2005) provides an excellent overview of the historic geomorphology of the Dungeness River delta as it changed with twentieth century development, and an historical summary of these events specific to the Project vicinity is given later in our report, below. However, the extent of land development that has impacted the ground surface of the Project parcel during the twentieth century can be seen in the comparative aerial photographs in Figure 6. In 1954, the parcel had been cleared and already used for agriculture for several decades. A major irrigation canal bisected the property where present-day Brownfield Road has been rerouted for the US 101 Bypass but is not within the current Project property, which appears completely undeveloped. Land use and lack of development here persisted another half-century as can be seen in the 1994 aerial photograph, which shows some vegetation alignments that reflect more irrigation ditching in the open field but no other visible surface changes. Construction of the bypass was completed in 1999, for which construction staging occurred here and surface sediments were likely pushed and/or removed. Despite earlier proposed residential construction (Berger 2010), the Project parcel has been vacant since then.

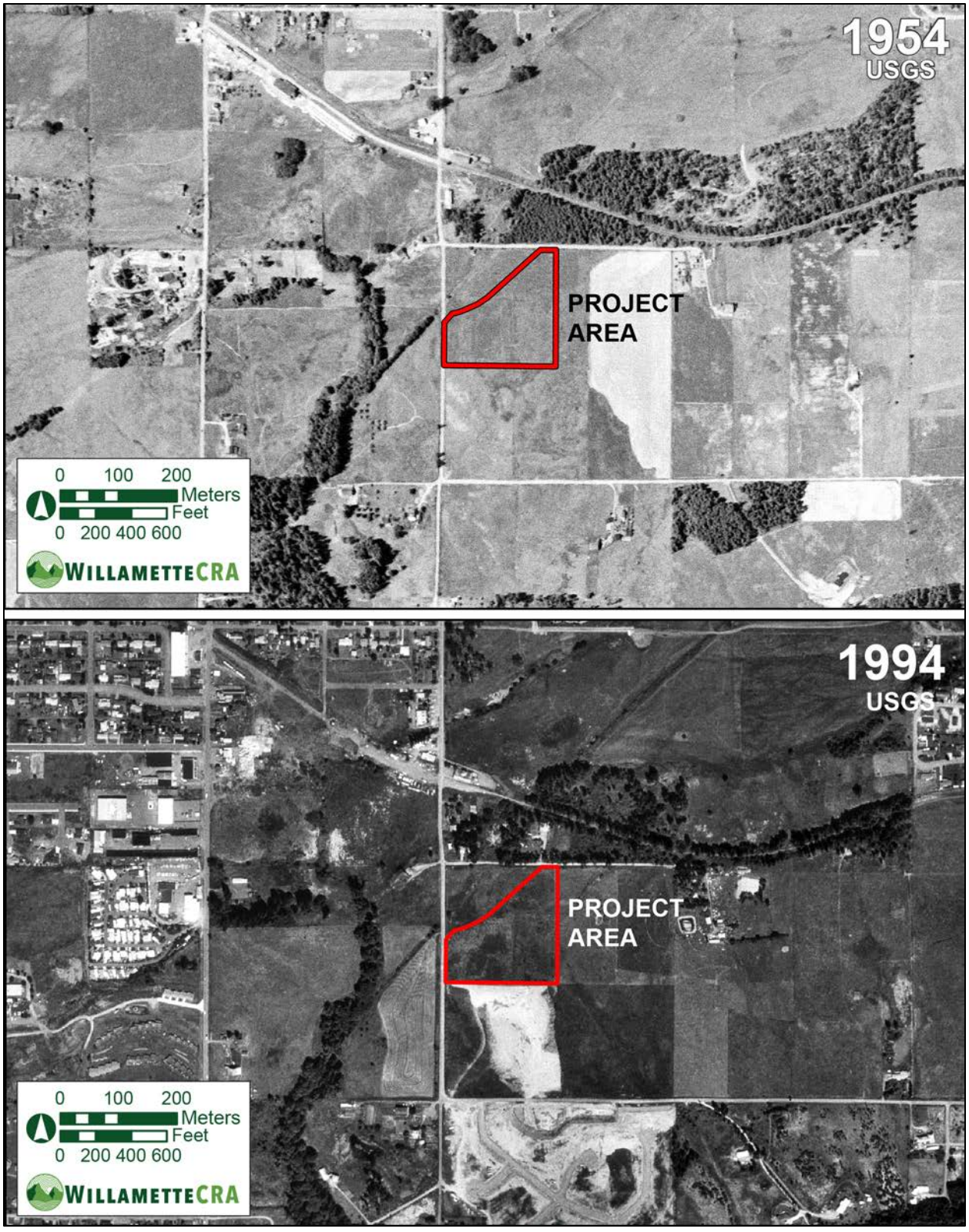


Figure 6. Persistence of land use between mid- and late-twentieth century as seen in aerial imagery.

Ecology and Biota

The lush, closed-canopy forests that characterize the flanks of the Olympic Mountains and Pacific Coast of northwest Washington State were established about 5,000 years ago, following more substantial shifts of the plant communities in response to the dramatic changes in climate from the late Pleistocene into the early Holocene epoch (e.g., Tsukada et al. 1981; Whitlock 1992). The Project vicinity is within the present-day *Tsuga heterophylla* (western hemlock) vegetation zone (Franklin and Dyrness 1988). Coniferous species commonly found within this zone include western hemlock, Douglas-fir, and western redcedar. The understory of old growth climax forests typically contains a dense mix of shrubs and herbaceous species including salal, Oregon grape, ocean spray, blackberry, red huckleberry, red elderberry, wild rose, and sword fern.

Local conditions, however, affect the distribution of plant species within the Project vicinity. These include slope and aspect, solar exposure, moisture availability, landform stability and periodic disturbances, such as flooding, mass wasting events, and fire. Prairie habitats with more open forest canopies, deeper soil horizonation, specialized communities of plants traditionally used by Native peoples such as camas and bear grass, and attraction of wild game such as deer and elk developed in pockets along the eastern coastal margins of the Olympic Peninsula. They were further maintained and managed by Native peoples through active harvest and selective fire (e.g., Hammam et al. 2011; Hegarty et al. 2011; Peter and Shebitz 2006; Wray and Anderson 2003). One such prairie, the Sequim Prairie, was documented by land surveyors in the mid-nineteenth century with its south edge near the present-day Project (General Land Office 1859).

The vegetation that composes the present-day community within and near the Project is a reflection of early European American logging followed by over century of intensive agricultural practices. Historic maps (see Postcontact Land Use section, below) indicate that the entire Project vicinity was logged from a large burn over 100 years ago, quickly followed by crop cultivation that would have entailed removal of boulders and burning of slash and stumps on the property beforehand. The specific plant-cover history of this parcel is not known, but may have shifted from planted crops to pasture vegetation for livestock, or rotated between them before the property was no longer actively farmed by the early 1990s.

The northeastern Olympic Peninsula and the adjacent marine waters supported numerous animal species important to both precontact and historic-era peoples. The coastal plains such as the Project vicinity provided a mosaic of forest and prairie habitats well-suited for large terrestrial mammals including Roosevelt elk, black-tailed deer, black bear, and mountain lion, as well as smaller fur-bearing mammals and resident game birds (Johnson and Cassidy 1997). Today, the lower Dungeness River near Project hosts spawning habitat for runs of spring/summer Chinook, summer chum, coho, and pink salmon, and summer and winter runs of steelhead trout (Haring 1999). Recent Washington Department of Fish and Wildlife (WDFW)

survey data suggests the Bell Creek watershed is hosting an increasing number of coho salmon and steelhead and cutthroat trout, as well as possible chum salmon and bull trout populations (Salmon Recovery Portal 2014).

Cultural Setting

Archaeological studies, ethnographic accounts, historical records, and discussion of cultural resource concerns with descendent community representatives provide a framework for identifying and evaluating cultural resources in the Project area. Archaeological data from elsewhere in the Olympic Peninsula and the Vancouver Island and Haro Straits region (including the Gulf Islands, Fraser Delta, and San Juan Islands) provide information regarding the settlement patterns, resource use, and subsistence economies of Native peoples prior to the contact period. Ethnographic and historical sources contain accounts of Native American occupation and land use on the northeast Olympic Peninsula after European-American settlement. Additional information from records from the county assessor's office, archival maps and photographs, and aerial photographs of the region provide information regarding historic land use of the Project vicinity. The detailed technical report for study of the Sequim Bypass site, 45CA426 (Morgan 1999), and the more recent previous survey of this Project parcel (Berger 2010) give very specific information that provide a context with which to assess and to evaluate the significance of cultural resources that may be identified within the Project limits.

Precontact Archaeology

The precontact record of Native American settlement and socioeconomic activities on the Olympic Peninsula is largely derived from controlled systematic archaeological excavations undertaken at a small number of sites spread across the peninsula. While these sites provide a glimpse into the activities undertaken by Native Americans at specific places and times, they must be viewed in the context of archaeological data from the surrounding region.

Archaeological data from the Pacific Northwest reflect the presence of humans beginning after the last glacial retreat, over 12,000 years ago (Ames and Maschner 1999; Kopperl 2016). Fluted projectile points characteristic of the widespread Clovis culture have been found as isolates in western Washington (e.g., Avey 1991). Based on the presumed function of these isolated stone tools and their rare association with the remains of large extinct mammals such as mammoths, some archaeologists believe that the initial inhabitants of the region were highly mobile large-game hunters (Gustafson et al. 1979; Waters et al. 2011). Archaeological sites identified on mainland and nearby island uplands reflect Native American settlement of the northern Olympic Peninsula at the end of the Pleistocene. These include the Manis Site (45CA218), about 1 mile south of the Project, with mastodon remains over 13,000 years old in association with a possible bone artifact (Gustafson et al. 1979; Waters et al. 2011). The Ayer Pond Site on Orcas Island is the partial skeletal remains of an extinct Pleistocene bison, without associated artifacts but exhibiting bone breakage and skeletal element representation patterns indicative of human butchering over 12,000 years ago (Kenady et al. 2011).

The imprint of humans on this landscape during the early Holocene, prior to about 5,000 years ago, is more well known, given a larger archaeological sample of sites that date to this period.

Excavations were conducted at two concentration of archaeological material located on a series of terraces north of the Manis Site during a re-routing of US 101, some of which may have been contemporary with the Manis Site. The lithic artifact assemblages recovered from these sites were given site inventory numbers of 45CA426 (Component I) and 45CA433 and originally named the “Fasola/Schaafsma Olcott Site” at the time they were recorded. They include leaf-shaped and stemmed projectile points, scrapers, flake tools, and blade cores produced from coarse-grained lithic materials that were similar to “Old Cordilleran” or “Olcott” assemblages reported in other parts of Washington and British Columbia that are believed to date to between 10,000 and 6,000 years old (Morgan 1999; see also Previous Cultural Resource Studies, below). These lithic assemblages are often identified in elevated areas some distance inland from modern shorelines, on river terraces, and at lake outlets (Butler 1961; Chatters et al. 2020). In addition to the Sequim sites, lithic artifacts resembling those from “Olcott”, or “Old Cordilleran” sites have been identified on the northern Olympic Peninsula in higher elevation subalpine and alpine areas (Gallison 1994; Schalk 1988; Schalk et al. 1996:4.2).

The archaeological record between about 5,000 and 2,500 years ago suggests that human populations increased along the Northwest Coast and that this increase was accompanied by increasingly complex socio-economic organization, the establishment of semi-permanent settlements, increasing use of marine resources, and diversification of tool assemblages (Ames and Maschner 1999; Matson and Coupland 1995; Moss 2011). This period is best known from coastal sites along the Gulf of Georgia, northern Puget Sound, and the Fraser River Delta. Many of these coastal sites include extensive shell midden deposits containing the remains of shellfish, fish, large and small mammals, and birds. Flaked stone artifacts from this period exhibit increased variation in form and material type, ground stone tools such as thin slate knives and adzes, and stone and wood carvings. Bone, antler, and shell tools also became more common. Archaeological deposits on the northern Olympic Peninsula dating to this period include several possible habitation features near Sequim at site 45CA426 (Component II) that may be temporary resource procurement and processing camps occupied during different seasons (Morgan 1999).

Archaeological data spanning the period from about 2,500 years ago until direct contact between Europeans and Northwest Coast native peoples just over 200 years ago attest to dynamic changes in Native American settlement and land use, subsistence, and social organization and the establishment of many elements of Northwest Coast Native culture described by early ethnographers. Archaeologists working in the Gulf of Georgia region have identified evidence of region-wide adoption of these complex social and economic relations and subsistence practices (e.g., Grier 2003; Lepofsky et al. 2005). The period features semi-sedentary settlement with large multifamily houses organized into central villages with highly specialized seasonally occupied resource procurement and processing camps. There is evidence of large-scale resource storage, reorganization of labor, and the development of social elites, ascribed social status, and differential access to resources. Many of these elements have

been described in the archaeological assemblage recovered at the Čĺxwicən village site, about 14 miles west of the Project near Port Angeles (Butler and Bovy 2019 and articles therein; Mapes 2009; Valadez and Arakawa 2015:26–28). A site closer to the Project, but smaller-scale in terms of archaeological excavation, is suxtcikwi'in (45CA227), a former village location at the entrance of Washington Harbor and Sequim Bay northeast of the Project (Blukis Onat and Larson 1984). Exotic materials and trade goods found at these sites demonstrate that Native American communities on the northern Olympic Peninsula were well positioned to participate in the regional exchange of stored resources and other items, and to build strong social networks.

Traditional Klallam Lifeways

The Project is in the traditional territory of the Jamestown S'Klallam, sometimes referred to as 'Klallam' or 'Clallam' in ethnographic literature (Bridges et al. 2015; Gunther 1927; Suttles and Lane 1990:453). The Jamestown S'Klallam Tribe has been a federally recognized tribe since 1981 with designated reservation land at the head of Sequim Bay, centered on the town of Blyn. The Jamestown S'Klallam speak a Clallam language, part of the Central Coast Salish branch of the Salishan linguistic family (Suttles and Lane 1990:453). The name 'Sequim' is an anglicized version of the Klallam word sxʷčkʷíyəŋ meaning "open area, field, meadow, plain" (Montler 2012:400) and "hunting grounds" (Montler 2012:428) and used to designate the nearby bay and the Klallam village at Washington Harbor. A traditional name for Sequim Prairie is spə́łx̣ən (Allie Taylor, personal communication 2024).

The S'Klallam people have lived in their traditional homeland since time immemorial. Their knowledge of their homeland is demonstrated in traditional stories, which explain many of its landforms (Clark 1953:65–67). Ethnographic and historical accounts confirm that S'Klallam people occupied most of the northern part of the Olympic Peninsula prior to European-American settlement (Indian Claims Commission 1974:353). The S'Klallam, like other tribes on the Olympic Peninsula, regularly traveled across the Straits of Juan de Fuca and through the mountains to visit other Native American and First Nations communities in the region along well-established trails and waterways (Wood 1967:103).

The S'Klallam homeland is a place where several major, distinct environments come together that provide resources and raw materials for all aspects of the traditional economic cycle. The traditional seasonal round was a continuous annual activity based on integration of terrestrial and aquatic resources, often involving brief moves to fisheries, shellfish beds, berry patches, or hunting grounds. Intimate knowledge of the seasonal cycles of plants and animals was and still is expressed in both economic terms, such as the annual subsistence round, as well as symbolic and mythological terms, including place names that are often embedded with ecological meaning. Several former villages and other places with Klallam names are dispersed along the edge of the Dungeness delta, concentrated near large spits that have formed protective bays on the north and east side of the delta (Brownell 2018; Gunther 1927:174,178).

Postcontact Land Use History

The northeast corner of the Olympic Peninsula was visited by European explorers early relative to other parts of the Northwest Coast. The first two were the Spanish mariner, Manuel Quimper, and the British explorer, George Vancouver. They mapped and assigned names to geographical landmarks such as the Dungeness Spit and Quimper Peninsula in the early 1790s (Arskey 2008; Clark and Clark 2015). However, it was not until the 1850s that permanent settlement occurred in the vicinity. European immigrants and Americans from the east coast predominantly settled around Dungeness and New Dungeness at the mouth of the Dungeness River north of present-day Sequim. Farmers were the earliest permanent European American settlers in the region. The area was prized for its rich forest lands and productive soils for growing potatoes, wheat, oats, and peas that were shipped to Puget Sound port cities.

European American settlement near Sequim was especially encouraged with passage of the Donation Land Act in 1850, which allowed up to 320 acres of land for an unmarried man and 640 acres for a couple who settled in Oregon Territory by December 1, 1850. Those settling in Washington between December 1, 1850, and December 1, 1853, could claim half as much land. By that end-date, Washington Territory had separated from Oregon Territory, and by 1855, the U.S. government was systemically attempting to remove Native Peoples from their lands to make way for increased European American settlement in the region.

Governor Isaac Stevens assembled with the S'Klallam, Chimakum, and Skokomish on the Kitsap Peninsula on January 25, 1855, attempting to purchase Tribal lands that by now had been assessed as incredibly valuable to European American interests. The Point No Point Treaty was signed the following day, with the government agreeing to pay sixty thousand dollars to each signatory tribe who agreed to relocate to small reservations along the Hood Canal. Members of the S'Klallam tribe were to relocate to the reservation at Skokomish; however, most chose to remain close to their traditional fishing areas (Jamestown S'Klallam Tribe 2010). By 1870, European American settlers had begun pressuring Bureau of Indian Affairs to forcibly relocate all treaty signatories to assigned reservations. In 1874, Lord James Balch and a band of S'Klallams purchased a 210-acre tract of land around Dungeness (Jamestown) for five hundred dollars. Here, the Jamestown S'Klallam community was self-sustaining by gardening, fishing, and working in area pulp mills (Jamestown S'Klallam Tribe 2010).

Although the United States General Land Office (GLO) surveyed much of the lower Dungeness River area at a relatively early date, including the forests and prairies of the interior (Figure 7), the earliest claims were along tidewater. Early homesteads and farms are shown nearby to the north, including the homestead claim of John Bell (namesake of the nearby hill). The Klallam village of suxtcikwi'in was also mapped at that time, simply labeled "Indian Village" on the 1859 map.

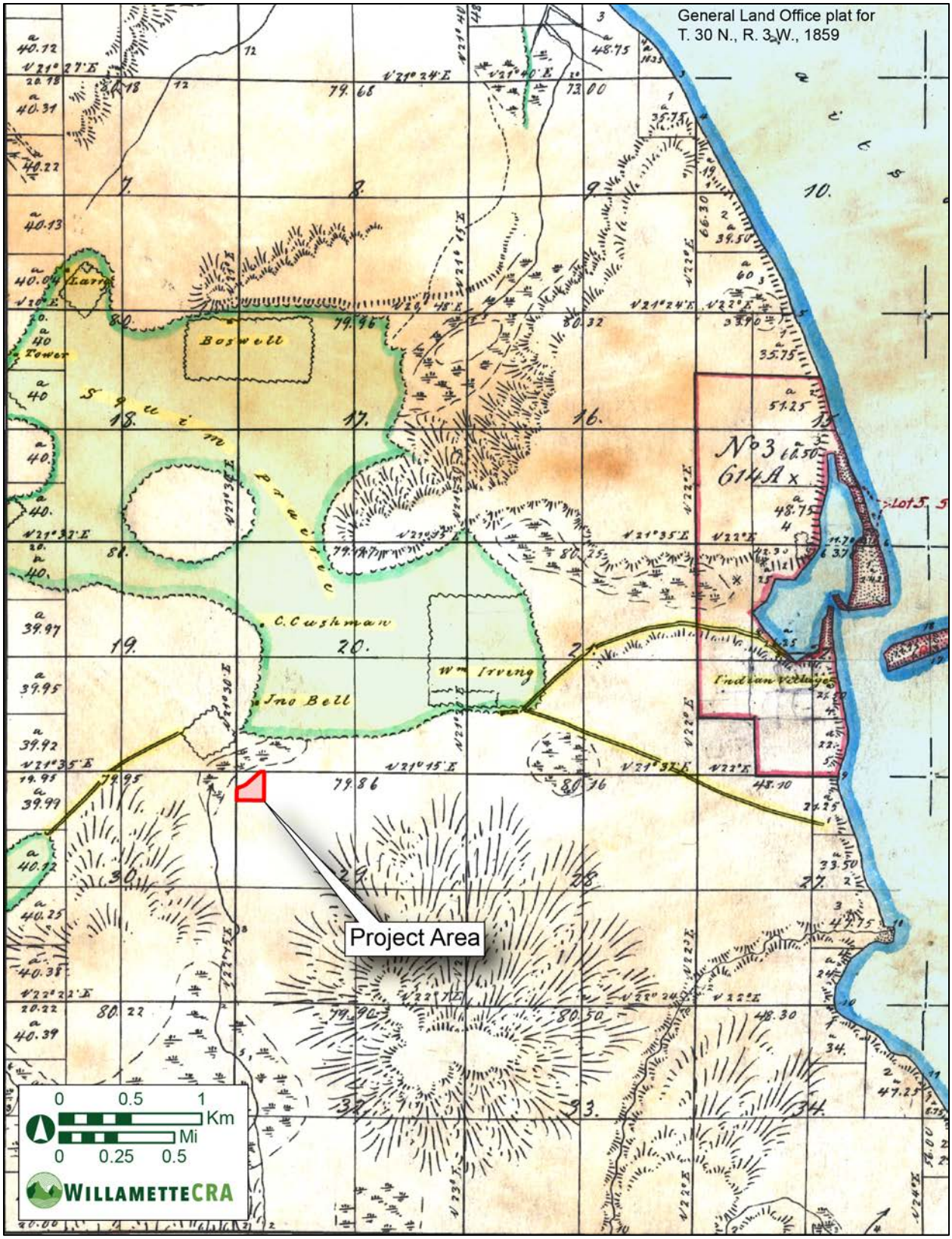


Figure 7. Portion of GLO cadastral survey map near Project, 1859.

The present-day Project parcel was not part of a Donation Land Claim, although several such claims were filed nearby to the north in the prairie. Instead, this parcel left federal ownership as part of a larger 160-acre land grant to George Webber in 1876 as a patent to his homestead claim (Bureau of Land Management 2024). Other lots near the Project originally surveyed by the GLO left federal ownership by homestead claim as well, or through cash sales. The town of Dungeness moved a short distance within the harbor in 1890 and was renamed New Dungeness. As a port of entry for goods and people, New Dungeness received competition that same year when a settlement with a wharf was established at Port Williams. It was not until 1898 that Sequim was platted, and 1913 when Sequim was officially incorporated (Clark and Clark 2015; Keeting 1978).

Sequim at the turn of the twentieth century was still a small farming community south of the larger community of New Dungeness. However, irrigation improvements made by the Sequim Prairie Ditch Company by the mid-1890s was already transforming what was once the natural prairie landscape near the Project into land more suitable for agricultural production. By then, the county seat had already been moved from New Dungeness to Port Angeles, and local population growth began aggregating around Sequim and the Project vicinity (Keeting 1976).

Since leaving federal ownership in 1876, the original land grant that included the Project parcel has been sold, subdivided, and developed. The earliest detailed map from the twentieth century, drafted by the US Army Corps of Engineers in 1909, shows the Project parcel as undeveloped land at the toe-edge of the slope rising immediately south of several subdivided farm fields and the then-recently platted town of Sequim (Figure 8).

By 1914, the NW ¼ ¼ section that includes the Project parcel had been fenced and cultivated, as shown on a Clallam County assessor map (Figure 9). The accompanying survey notes describe this 40-acre lot as having rolling topography with a portion cleared and cultivated, another portion just cleared, and the remainder slashed and burned but had yet to be cleared. A split cedar rail fence is noted around the property, and the map shows established roads along the east and south edges of the lot. No built environment features were within the Project limits, but the survey notes describe the farmhouse complex for the property in the ¼ ¼ section immediately to the east, which included a house, barn, chicken house, an orchard, and a well (Wheeler and Simpson 1914). A year later, the Seattle, Port Angeles and Western Railroad was completed that passed within a few hundred feet of the Project parcel and connected Sequim with Port Townsend and points east.

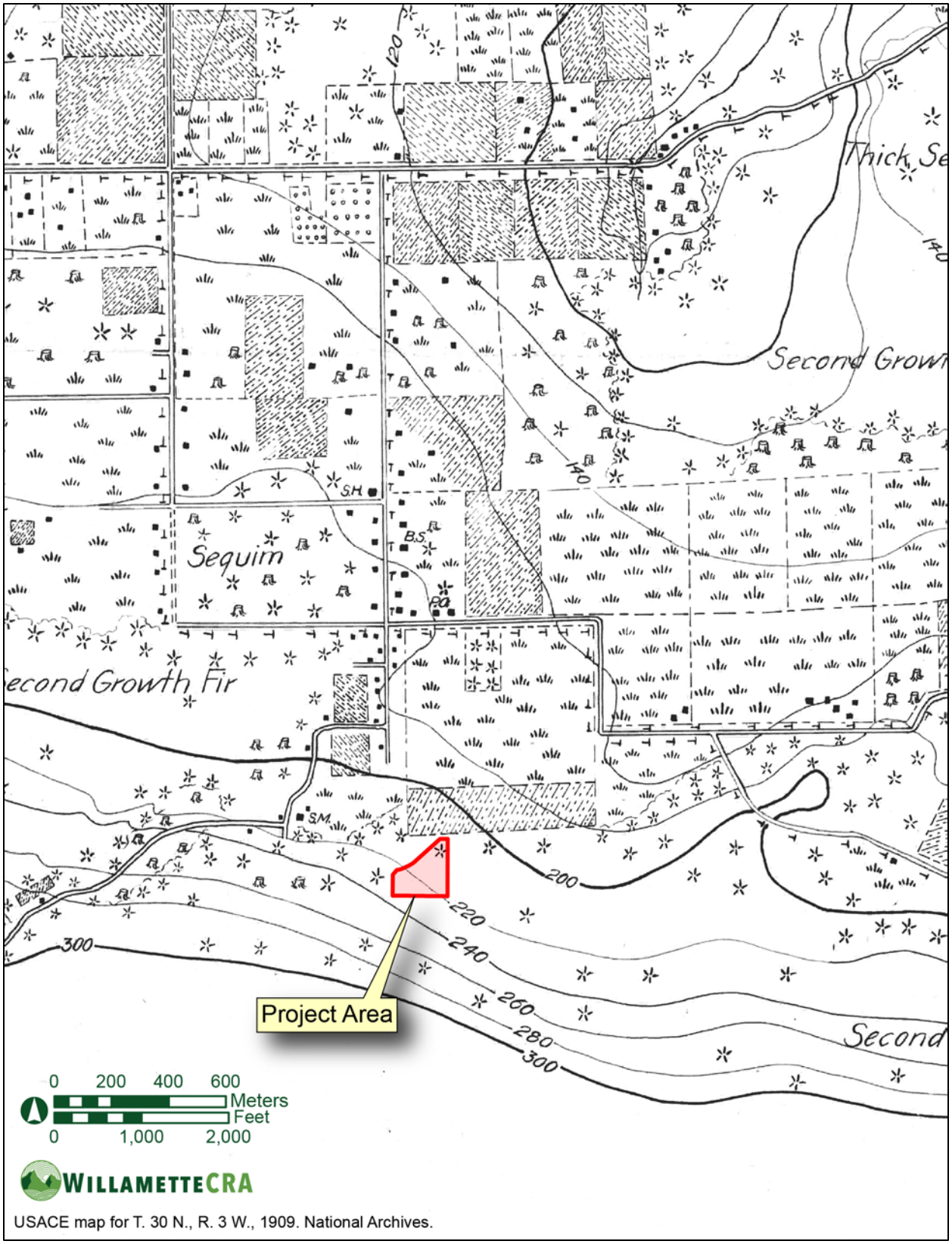


Figure 8. Portion of US Army Corps survey map from 1909, including Project area.

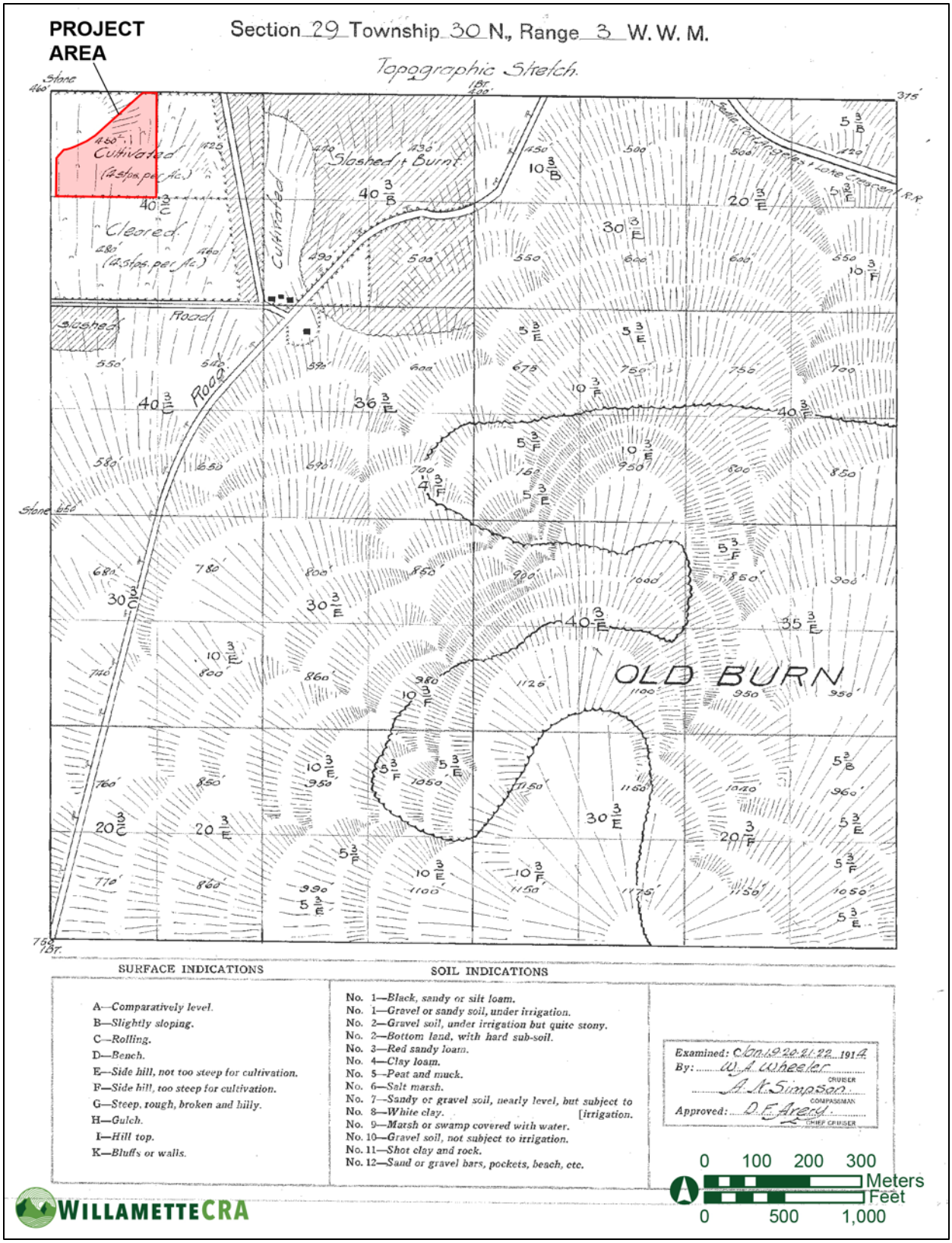


Figure 9. Clallam County assessor map for the legal section including the Project Area, 1914.

A comparison of two of the earliest published county property atlases shows subdivision of parcels in the Project vicinity as well as apparent persistence of general land use patterns during the 1920s. Figure 10 shows these shifts between 1921 (top) and 1928 (bottom). In 1921, the Bell family, through Jason Bell, still owned a large 120-acre tract of land that included the present-day Project parcel. To the north, the town of Sequim is shown as the Sequim Acres subdivision. The southwest-northeast oriented farm road shown on the 1914 map is still the major road nearby, along with the new railroad labeled on the Kroll map as its parent company, the Chicago, Milwaukee and St. Paul Railroad. By 1928, Bell's property was subdivided and Alice E. Bentley is shown as the owner of the 40-acre parcel that would remain intact for most of the rest of the twentieth century. Bell Creek is shown running through the adjacent parcel to the west.

The growth of the town of Sequim and increasingly intensive irrigation in the surrounding farmland are reflected in United States Geological Survey (USGS) topographic maps of the mid-twentieth century (Figure 11). By the late 1930s, Bell Creek had been diverted in several places to provide water to Sequim farmland, including a canal that cut through the northwest corner of the Bentley parcel. Aerial imagery from the following decades (see Figure 6) shows smaller ditches bisecting the parcel but no other development. Main roads ringing the Olympic Peninsula were connected in the 1920s to provide an automobile route that circumnavigated the Olympic Mountains, completed to officially become State Highway 101 in August 1931. The highway ran through downtown Sequim until the four-mile bypass was completed immediately north of the Project parcel, which opened to traffic in August 1999 (Arksey 2010).

Previous Archaeology

WillametteCRA reviewed records on file with the Washington DAHP's online database system on March 4, 2024, to identify all previous cultural resource studies and archaeological and historical resources within or near the Project. Fourteen reports of previous cultural resources investigations and eight previously inventoried archaeological sites are within one mile of the Project limits. Numerous and previously recorded historic built environment resources have also been documented nearby, mostly clustered around downtown Sequim. The highway bypass project's intensive study of 45CA426 and the archaeological survey for the senior housing project are the most relevant studies, and they are described in more detail below.

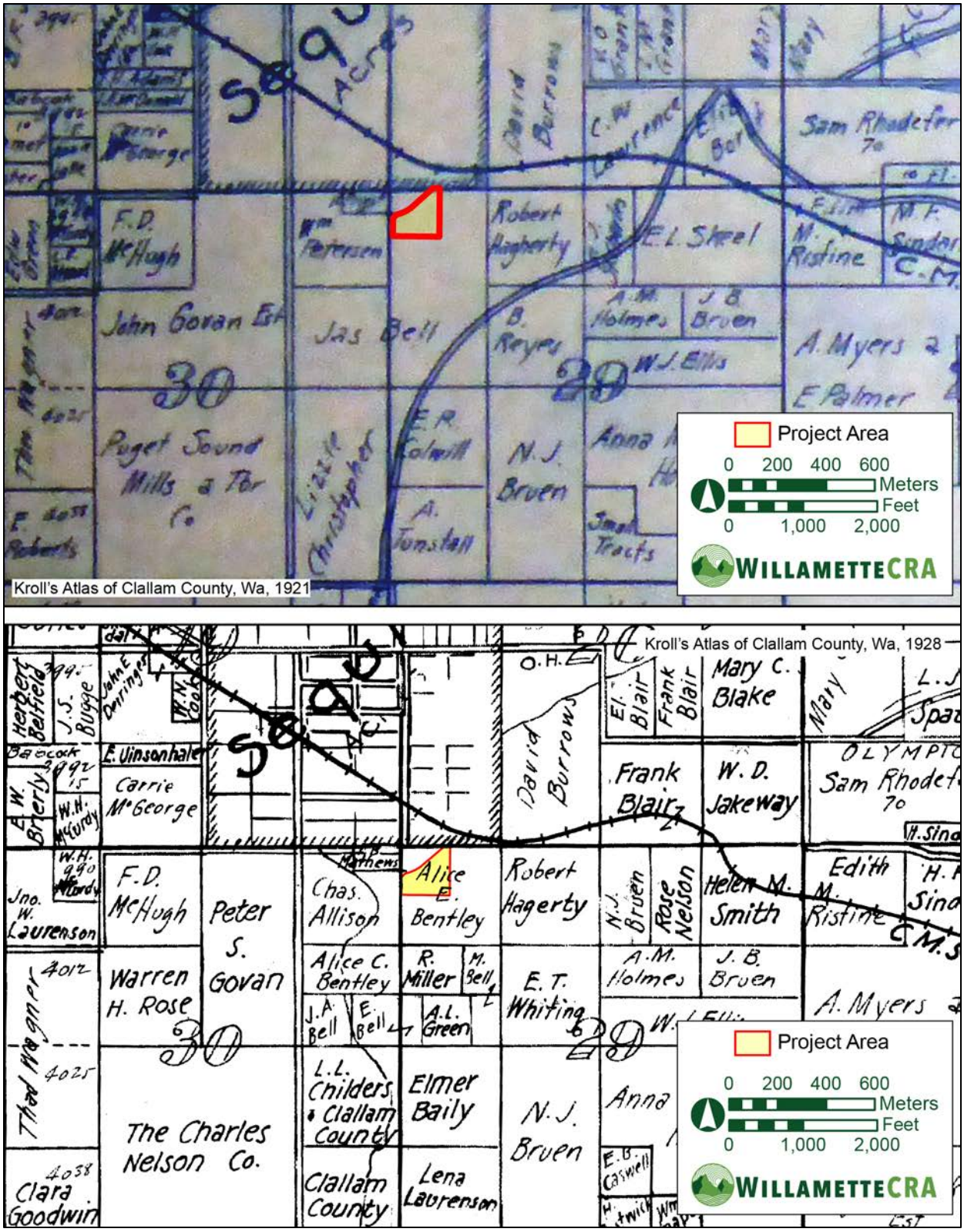


Figure 10. Comparison of Project vicinity between 1921 (top) and 1928 (bottom) Kroll property atlases.

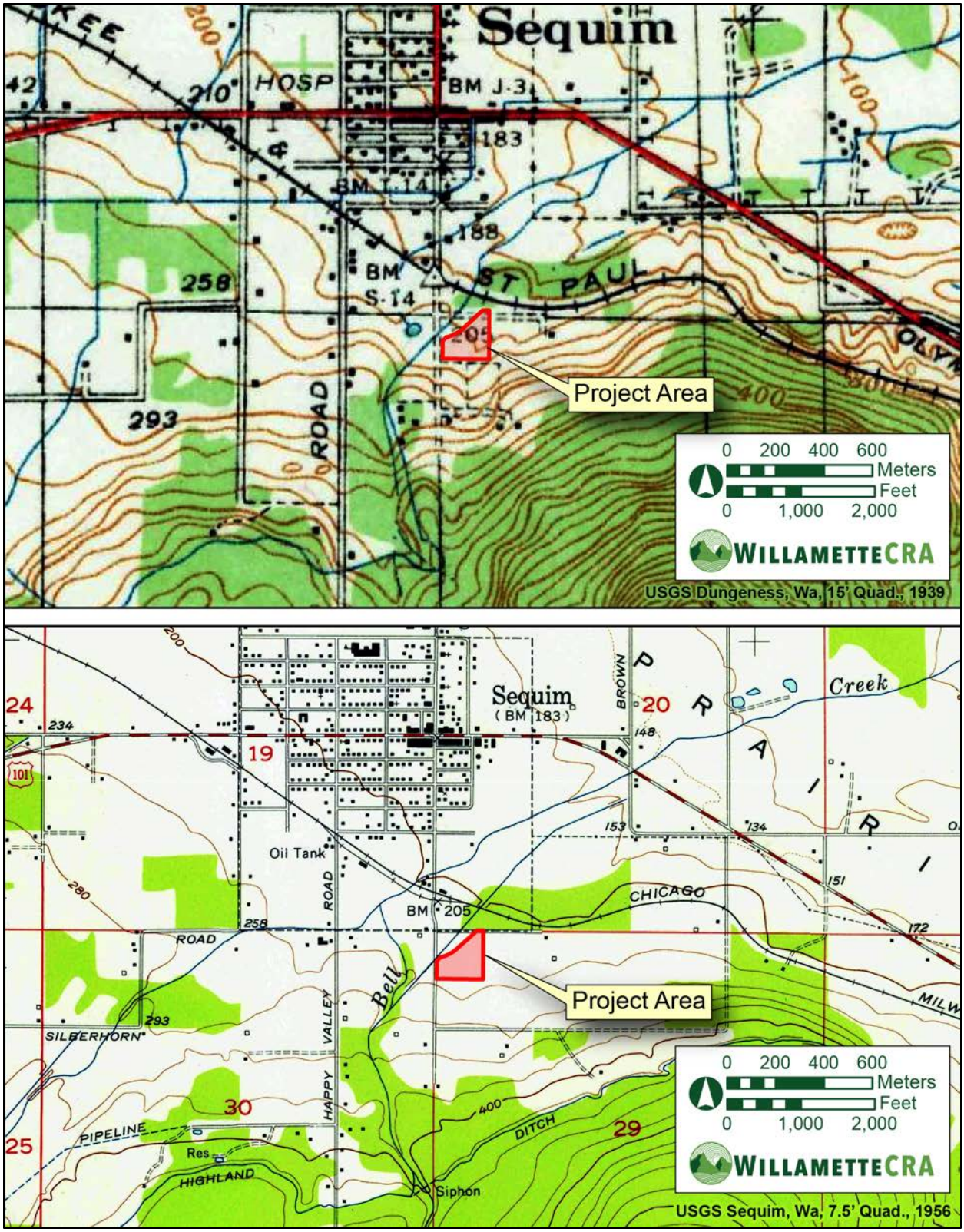


Figure 11. Comparison of Project vicinity between 1939 (top) and 1956 (bottom) USGS topographic maps.

The previous cultural resources studies on file with DAHP are summarized in Table 1. As noted above, the investigations related to construction of the US 101 Bypass (Morgan 1996a, 1996b, 1997, 1999) and the Sequim Senior Housing project (Berger 2010) are the closest and most relevant to the Project and described in more detail below. The other project reports represent a variety of cultural resources compliance efforts for various projects, most being surveys completed in a SEPA regulatory framework for residential and other construction and upgrade projects and Section 106 of the National Historic Preservation Act for state and municipal transportation projects. The projects that yielded identification of archaeological resources, both Native American and European American, tended to be those that completed close-interval shovel probing (e.g., Hodges and Stevenson 2005; Morgan 1996a, 1997).

Table 1. Previous Cultural Resource Investigations Within 1 Mile of APE.

Report Reference	Type of Investigation and Project	Approx. Relation to Project Area	Cultural Resources Identified Within 1 Mile
Baldwin and Hanson 2017	Survey – Bell Hill Estates Subdivision Project	0.8 mile E	None
Baldwin et al 2022	Survey – Legacy Ridge Project	0.8 mile SW	None
Berger 2010	Survey – Sequim Senior Housing Project	Overlaps	None
Berger and Kassa 2015	Survey – W. Fir Street Improvements	0.7 mile N	None
Bush and Wilmoth 2020	Survey – 3964 Happy Valley Road Septic Project	0.9 mile S	None
Carlson and Gardner 2023*	Survey – Rolling Hills Residential Development Project	0.5 mile W	45CA550 45CA843 45CA844 45CA845 45CA846
Cauffman 2014	Survey – Sequim Prairie Berger-Dawley-Shaw Irrigation Project	1.0 mile NW	None
Hodges and Stevenson 2005	Survey – Sea Breeze Housing Development Project	0.6 mile W	45CA550
Morgan 1996a	Survey and Testing – US 101 Sequim Bypass Project	<0.1 mile N	45CA426 HPI 3080
Morgan 1996b	Data Recovery Progress Letter Report – US 101 Sequim Bypass Project	<0.1 mile N	45CA426
Morgan 1997	Survey – Additional Properties for US 101 Sequim Bypass Project	1.0 mile E	45CA472
Morgan 1999	Data Recovery – US 101 Sequim Bypass, 45CA426	<0.1 mile N	45CA426
Parvey and Fruge 2022	Survey – Sequim Subdivision Phase B Project	1.0 mile SW	None
Taylor et al 2020	Survey – Jamestown S'Klallam Tribe Medically Assisted Treatment Facility Project	0.9 mile NW	None

* Not available on WISSARD at time of this report.

Eight archaeological sites have previously been recorded within 1 mile of the Project, summarized in Table 2. The presence of archaeological resources and the reflection of their apparent intensity dating through much of the Holocene is a testament to the archaeological sensitivity of the immediate vicinity of the Project. The nearby Manis Mastodon Site pushes the physical record of such occupation back to the Late Pleistocene. Remnants of early-mid twentieth century farming and homesteading activities also compose a portion of the nearby archaeological record.

Numerous historic built environment resources have previously been recorded to DAHP's Historic Property Inventory (HPI) and shown on WISAARD within 1 mile of the Project. No standing buildings are present on the Project property, nor are any HPIs adjacent to the Project; HPIs within 1 mile are therefore not tabulated for this report. Most of them cluster in the downtown Sequim area about one-half mile north of the Project. One HPI, the Fasola Barn (HPI 3080) once stood just south of the south edge of the Project and was recorded in 1992 as part of the Sequim Bypass cultural resources assessment, but its historic register eligibility left undetermined (Morgan 1997). A second resource, the Sequim Hospital (HPI 3073) is shown on the WISAARD GIS system just east of the barn, but is clearly mis-located on that mapping system and was located in downtown "Old Sequim" instead.

Table 2. Previously Recorded Archaeological Sites Within 1 Mile of APE.

Site No.	Site Name	Site Type	Relation to Project Area	Significance/NRHP Recommendation
45CA218	Manis Mastodon Site	Precontact resource processing site	1.0 mile S	Listed in NRHP
45CA426	Sequim Bypass Site, Fasola Schaafsma Site	Precontact camp	Potential overlap	NRHP Eligible
45CA472	Mary Bell Site	Precontact thermal features	0.2 mile E	No Recommendation
45CA550	n/a	Historic debris scatter	0.5 mile W	2005 – Rec. Not Eligible 2023 – Det. Not Eligible
45CA843	n/a	Historic irrigation ditch	0.6 mile W	Determined Not Eligible
45CA844	n/a	Historic rock pile	0.7 mile SW	Determined Not Eligible
45CA845	n/a	Precontact isolate	0.7 mile SW	Determined Not Eligible
45CA846	n/a	Precontact isolate	0.8 mile SW	Determined Not Eligible

Archaeological Study of the Sequim Bypass Site

Figure 12 shows the current Project limits in relation to the boundary of 45CA426 as mapped during the original survey, testing, and data recovery for the Sequim Bypass project, as well as mechanical test pits and observations of surface disturbance on the Project parcel when it was included as part of the 2009-2010 Sequim Senior Housing project, which overlapped those archaeological site boundaries.

The Sequim Bypass site was first recorded in 1977 by Washington State University (WSU) archaeologists studying the nearby Manis Mastodon site (see above), when several Olcott projectile points and scrapers collected over time from the Fasola farm were shown to them. In 1986, one of the WSU archaeologists, Delbert Gilbow, conducted limited testing at the site as part of a summer Peninsula College field school. Numerous pieces of non-diagnostic basalt lithic debitage were collected and a general estimate of the horizontal extent of the site along a terrace edge of Bell Creek were made (Gilbow 1992; Morgan 1996a).

More formal study of the site occurred during the early planning and permitting stages of the US 101 Sequim Bypass project, when the archaeological survey—a combination of shovel probes and mechanical test pits—was conducted along the planned bypass right-of-way (Morgan 1996a). Additional basalt flakes and points diagnostic to the Olcott tradition were found at the nearby Schaafsma yard and other properties, and mechanical test pits helped define a much larger boundary of the site within the right-of-way and project area. Two features, a living surface on the upper terrace and a rock oven on the Bell Creek floodplain, were also encountered. The abundance of artifacts, presence of features, and their association with early-middle Holocene human occupation of the Sequim coastal plain prompted recommendation of the site for listing in the NRHP.

Data recovery excavations and analysis of the site were conducted in 1996 and 1997 by Archaeological and Historical Services (AHS) as mitigation for construction impacts, followed by archaeological monitoring as construction was completed (Morgan 1999). Mechanical and hand-excavated trenches and units were completed that extensively sampled both the Olcott-associated site component on the Fasola terrace (Component I) and the later Holocene component on the Bell Creek floodplain (Component II). Well over 100,000 lithic artifacts were recovered. Although no radiocarbon age estimates were obtained for Component I, the Olcott-style projectile points and artifacts of distinctive lithic raw materials and weathering patterns confirm its antiquity. Component II, well-dated by radiocarbon dates and temporally diagnostic artifacts, included features interpreted as a habitation structure, rock ovens and firepits, and a variety of activity areas including intensive butchery of deer, elk, and other terrestrial animal species. The full report that describes and interprets the archaeological data recovered during the Sequim Bypass project is given by Morgan (1999).

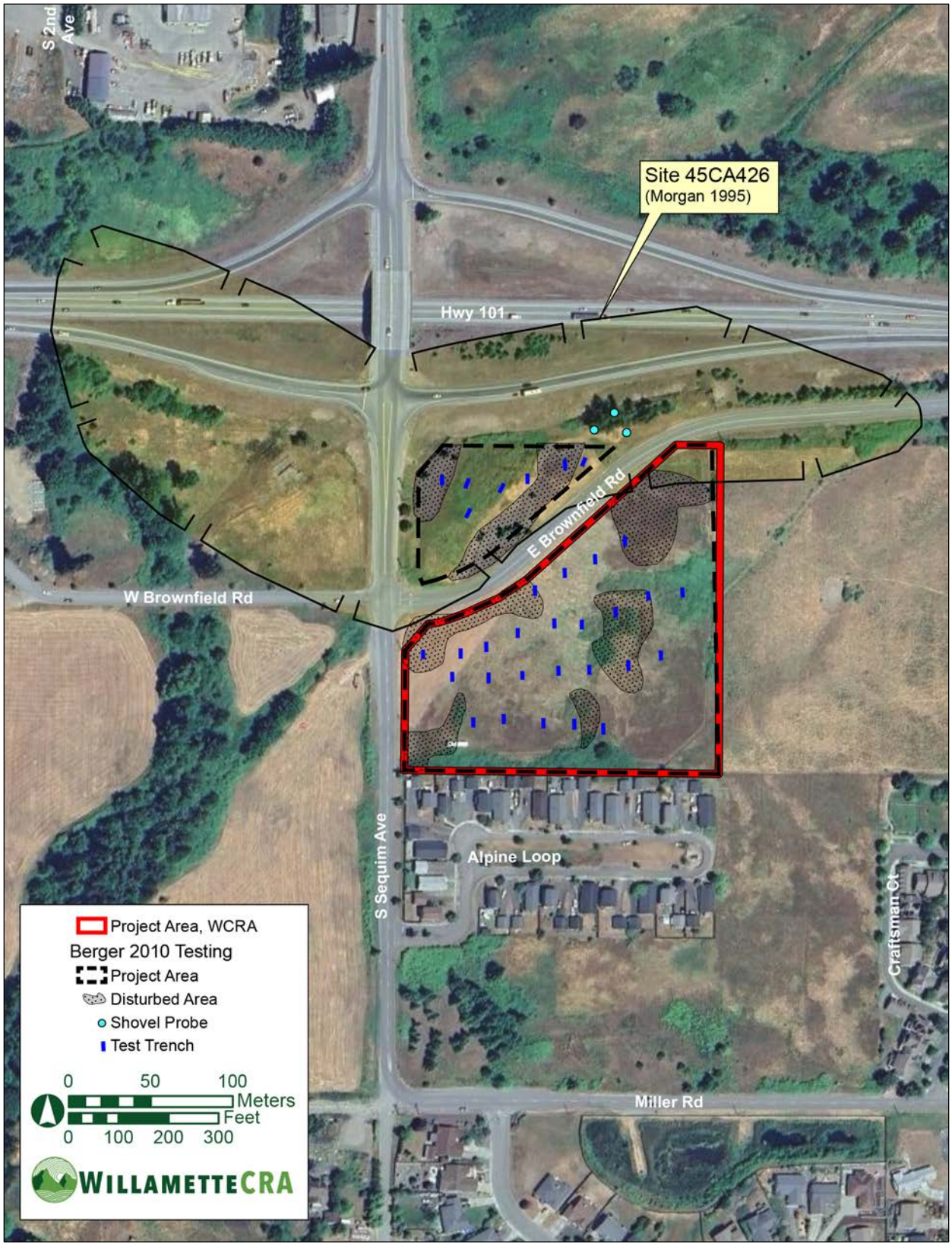


Figure 12. 1995 site boundary of 45CA426 and 2009/2010 project mechanical test trenches.

Component I was identified in the AHS excavations at three of the data recovery loci—Locus A, Locus B, and Locus D, which were situated south of the terrace edge on the geologically older surface of the site. None of those block excavations extended south beyond the revised Brownfield Road right of way, although the archaeological site boundary along that edge was drawn with a buffer that overlaps the Project parcel (Figure 13). The archaeological material from Component I deposits on the terrace were confined to what AHS defined as Stratum II, a stratigraphic unit composed of a pale brown gravely/cobbly silt loam 10–15 cm thick, underlying a very thin soil A horizon (Stratum I) and overlying the unweathered glacial deposits of the Fasola terrace (Stratum III) (Morgan 1999:6.5–6.6). The contact between Strata II and III was inferred to be an erosional contact boundary, where occasional oxidized areas were observed between the two strata. Along with previous survey and testing results, conclusions drawn from the data recovery excavation suggested that the Component I deposits on the terrace were concentrated at Locus B. “Activity Areas” defined for this analysis were limited to the large excavation block in Locus B (Morgan 1999:8.2). While subsequent construction monitoring in the vicinity of 45CA426 exposed numerous archaeological thermal features associated with Component II in the Bell Creek floodplain, only two pieces of lithic debitage were found associated with Component I, immediately west of the Locus B excavation block (Morgan 1999:18.15).

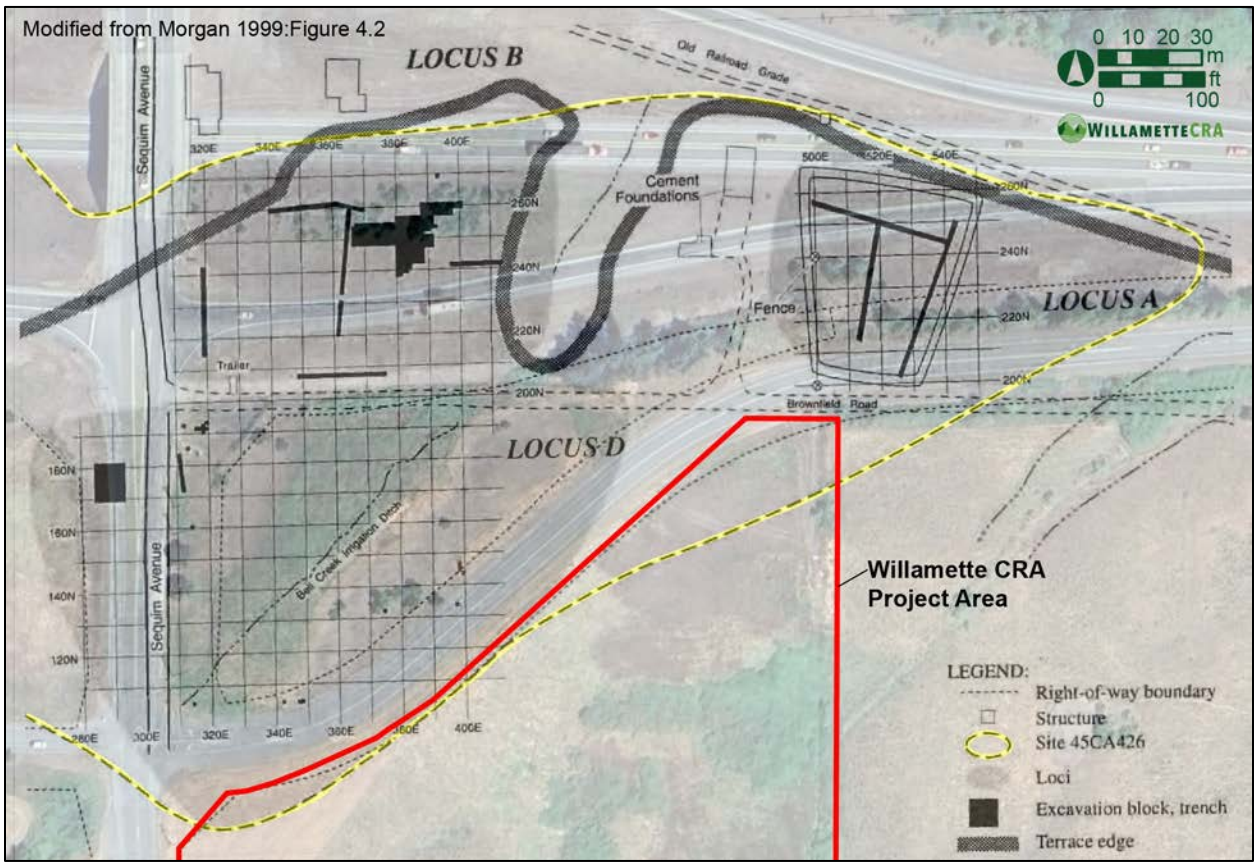


Figure 13. Data recovery excavations at 45CA426 in relation to HfH Project area.

Previous Archaeological Survey of the Project Parcel

The Project parcel has been vacant since the US 101 Bypass was completed in 1999. However, a previous cultural resources assessment was completed when the parcel was under consideration for a senior housing project, along with the smaller parcel north of Brownfield Road that is the remainder of the former 40-acre lot before the road was rerouted through it. Cultural Resources Consultants, Inc. (CRC) conducted the assessment in 2009-2010 as part of SEPA review for the project (Berger 2010), which was ultimately abandoned.

CRC was aware of the proximity of 45CA426, which overlapped all of the northwest parcel not included in the present Project, as well as the northern edge of the present Project parcel. However, the AHS archaeological studies during the 1990s for the Sequim Bypass project did not include controlled subsurface excavations here despite drawing the archaeological site boundary as such. Consequently, CRC applied for a DAHP excavation permit (#09-24) to complete their assessment, which included determining whether the archaeological deposits of 45CA426 extend southeast from the known site area into the project parcels.

Mechanical trench excavation was the primary means CRC used to complete subsurface survey. The test pits were spaced at approximately 20-meter intervals with representative spoils samples screened; a total of 32 test pits were completed. Three hand-dug shovel probes were also excavated to avoid places where vegetation and the irrigation canal could not be disturbed. Pedestrian survey was used primarily to define areas of historic and modern surface disturbance. Within the present Project parcel, the test pits generally covered the entire area except the northeast, southeast, and southwest corners (see Figure 12).

CRC found no artifacts or evidence of archaeological stratigraphy during their survey (Berger 2010). They observed the topsoil absent across large portions of their project limits, suggesting that the AHS-defined Stratum I and possibly the artifact-bearing Stratum II had been disturbed or removed altogether. Most of their trenches exhibited stratigraphy consistent with the previous data recovery excavation, including Stratum II and III as well as oxidized lenses near the contact between the two strata. In consultation with DAHP, those oxidized layers were further explored to determine whether they were archaeological features or associated with more recent natural burning or anthropogenic land-clearing events. With further limited testing, the lack of artifacts or fire modified rock (FMR), and the presence of unburned wood, bark, and roots indicated these were non-archaeological in origin (Berger 2010:15–16).

Expectations for Cultural Resources

The current Project limits were considered, prior to our fieldwork, to be an area of very high sensitivity for Native American archaeology based on the proximity of 45CA426 but tempered to some extent by more recent archaeological survey of the immediate Project vicinity with negative findings and indications of surface disturbance throughout the parcel. The broader Project setting, as described in the background sections of this report above, was and still is a place of tremendous importance to the Jamestown S'Klallam Tribe for traditional use since time immemorial. Archaeological resources that were considered possible within the Project area included isolated artifacts as well as intact archaeological deposits reflecting a wide range of activities and kinds of occupation. Postcontact archaeological remains from European American agricultural activity were also considered possible given the known twentieth century land use of the property and proximity of a now-demolished historic barn. No standing structures are within the parcel; therefore, no historic built environment resources were expected.

Field Methods

Fieldwork included pedestrian survey transects and subsurface shovel probes (SP) across the Project parcel. The pedestrian examination of the Project consisted of walking over the entirety of the property in 10-meter interval transects with the goal of updating existing surface documentation from the previous cultural resources assessment (Berger 2010). SPs were used to better assess the likelihood of buried archaeological resources within the Project limits and to provide information on stratigraphy and site formation.

The SPs were placed to fill in gaps in the mechanical test pit survey performed by CRC in 2009 (Berger 2010), primarily in the northeast, southeast, and southwest corners of the property, as well as interspersed between previous CRC test pits closer to the center of the property (Figure 14). Our probes measured 40–50 cm in diameter and were hand-dug with the goal of terminal depth into the culturally sterile unweathered glacial till deposits (soil C horizon). However, some probes were terminated within the soil B horizon when encountering large cobbles that could not be removed with hand tools. Given the likelihood based on surface geology that archaeological materials would be encountered no deeper than within the B horizon, all terminal depths were considered sufficient for our survey. WillametteCRA excavated each probe in 10 cm arbitrary levels, and all excavated sediments were screened through ¼-inch mesh.

The WillametteCRA field crew recorded each SP by describing the sediment, identifying stratigraphic layers and their depths, and recording the presence of cultural material if observed. WillametteCRA recorded all 2024 probe locations with a Global Positioning System (GPS) device capable of sub-meter accuracy and took digital photographs of a representative sample of the probes. Probes were backfilled after the excavation and appropriate documentation was completed.

Results

WillametteCRA archaeologists F. Scott Pierson and Althea Fitzpow conducted a pedestrian survey and subsurface survey on March 13, 2024. The weather was cool, clear, and dry. The pedestrian survey covered the entire ~6.5-acre parcel and the crew excavated a total of 10 SPs (see Figure 14). Jamestown S'Klallam THPO Allie Taylor visited the parcel during our fieldwork, as did HfH Construction Lead Joe Morton. No surface or subsurface cultural materials were observed during fieldwork. The table in Appendix B summarizes the SP results.

Existing Surface Conditions

WillametteCRA was able to complete the pedestrian survey across the entire Project parcel in meandering transects spaced about 10 meters apart or less. The rolling but generally level topography of the parcel was apparent; surface visibility was very poor with 6- to 8-inch-tall grasses and forbs covering almost the entire parcel (see cover photo). We were unable to positively relocate CRC's mechanical test pit locations given the extent of plant cover on the parcel. Other vegetation observed was limited to a single red alder on the southern edge of the parcel as well as the remnants of a large blackberry patch (Figure 15).

Numerous dead blackberry canes were located along the southern edge of the parcel and few along the eastern edge. A ditched catch drain filled with clean pea gravel was observed running through the blackberry patch (Figure 16), following the southern edge of the Project parcel and curving to the north in the southeast corner, continuing along the eastern edge. The drain discharges water into a ditch to the north near Brownfield Road. Other apparent disturbances observed include tire tracks likely created during contractor site visits. Modern refuse was almost entirely absent in our observations of surface conditions; no archaeological materials were observed during the pedestrian survey.

Subsurface Shovel Probes

A total of 10 subsurface probes (SPs 1–10) were laid out to fill in gaps in CRCs previous mechanical trench testing (see Figure 14). Sediments, stratigraphy, and soil development were relatively consistent. The probes were terminated at an average of 71.5 cm below surface (cmbs). SPs 7–9 were placed near the center of the parcel in a topographically somewhat lower area, roughly corresponding with the buffered wetland in Project design plans. Sediment in these probes was saturated, often with standing water near terminal depth (Figure 17), making a determination of the extent of anthropogenic disturbance difficult. A few fragments of charcoal were occasionally found in SPs across the survey area, but no oxidized layers or charcoal concentrations such as those noted during the previous survey were observed. No archaeological or otherwise cultural materials were observed in the SPs.

A dark brown soil A horizon composed of 20–30 cm formed in the surface deposits across the parcel, which were generally gravelly fine sandy silt with common subangular to subrounded

pebbles and cobbles. Underlying this was a yellowish-brown to light grayish-brown soil B horizon formed in cobbly fine to very fine sandy silt (Figure 18). The probes were terminated at what was interpreted as the unweathered glacial till at the base of the B horizon, where the sediments were pale brown, noticeably sandier with more cobble content, and more compact. In sum, the stratigraphy observed during our subsurface survey was relatively similar to the stratigraphic descriptions from CRC's previous mechanical trench testing.

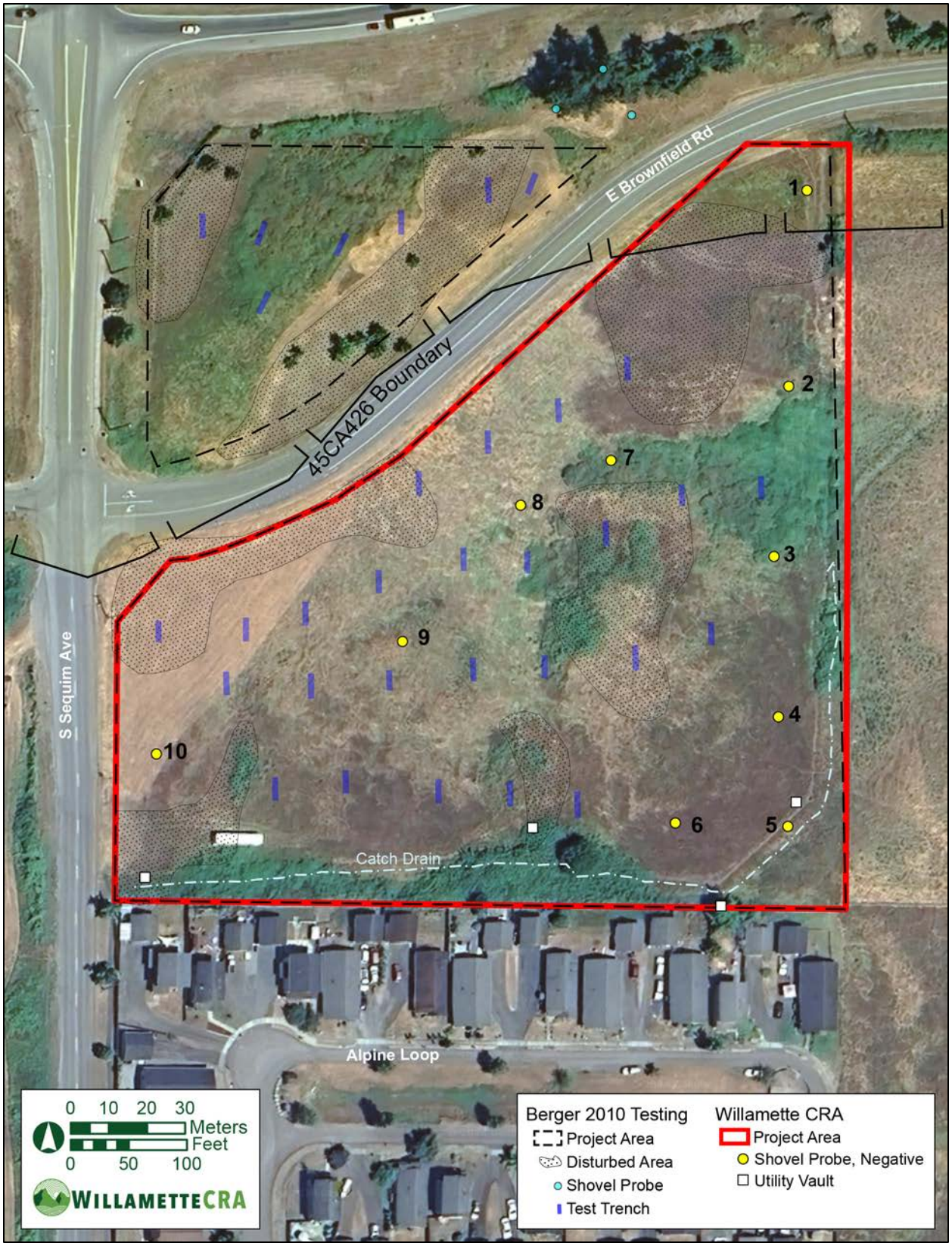


Figure 14. WillametteCRA shovel probe excavation locations, relative to previous CRC work.



Figure 15. Overview from southeast corner of the Project Parcel. Cut blackberry canes cover the surface in the left frame. View west.



Figure 16. Ditched catch drain and associated concrete vault along the eastern edge of the Project Parcel. View north.



Figure 17. SP 7 profile with saturated sediment making it difficult to determine if evidence of previous ground disturbance is present.



Figure 18. SP 4 profile showing typical stratigraphy observed during the subsurface survey.

Conclusions and Recommendations

WillametteCRA completed the cultural resources assessment for HfH's proposed Sequim affordable housing project, which involved background research and surface and subsurface survey that supplemented a previous cultural resource investigation of the parcel (Berger 2010). No archaeological or otherwise significant cultural resources were identified in either assessment. Substantial twentieth century anthropogenic disturbances, including ground clearing, cultivation, and highway construction, have largely removed the near-surface sediments that formerly composed the natural ground surface here. The highly significant Sequim Bypass Site, 45CA426, was identified adjacent to the Project parcel and its boundary was drawn at conclusion of the original study associated with the highway bypass construction project (Morgan 1999) in a way that overlaps the Project parcel. However, both Berger (2010) and the present study did not find evidence that the archaeological deposits extended this far south, or if they did they are now gone.

No further identification efforts or other archaeological management measures such as construction monitoring are recommended. We do recommend, however, an Inadvertent Discovery Plan (IDP) be drafted and implemented by the HfH in coordination with the City as the agency with SEPA jurisdiction. The IDP should be given to and reviewed with HfH's construction contractors prior to the start of ground disturbance and be on-hand during all ground disturbing activities associated with this Project. The IDP should have clear procedures and protocols to be followed in the event, however unlikely, that significant archaeological resource or human skeletal remains are encountered during construction. Current contact information for DAHP, JST THPO, and the City SEPA coordinator should be included.

In the unlikely event that human remains are encountered at any time, state law (RCWs 68.50.645, 27.44.055, and 68.60.055) requires all activity to cease that may cause further disturbance to those remains, and the area of the find secured and protected from further disturbance. The finding of human skeletal remains will be reported to the Clallam County Coroner and local law enforcement in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The Coroner will assume jurisdiction over the human skeletal remains and determine whether those remains are forensic or non-forensic. If the Coroner determines the remains are non-forensic, they will report that finding to the DAHP, who will take jurisdiction over the remains. The DAHP will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will determine whether the remains are Indian or Non-Indian, and report that finding to any appropriate cemeteries and the affected tribes. The DAHP will then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

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Appendix A:
Previous SEPA Review Cultural Resources Correspondence

JAMESTOWN S'KLALLAM TRIBE
1033 Old Blyn Highway, Sequim, WA 98382 360/683-1109 FAX 360/681-4643

ATTN: Travis Simmons
Assistant Planner
Department of Community Development
City of Sequim

December 20, 2023

Re: BSP-23-003 and CUP-23-003 Habitat for Humanity Development

Dear Travis,

The Jamestown S'Klallam Tribal Historic Preservation Office (THPO) has received information regarding the Habitat for Humanity Development project at Clallam County tax parcel 033029229020 located east of S. Sequim Road, north of Alpine Loop Rd, and south of Brownfield Rd. The project is within a very high potential location for encountering cultural resources as the parcel is immediately adjacent to the Sequim Bypass Site (45CA426). This site was subject to data recovery in the past; however, the full extent of the site is unknown and little work has been conducted within the proposed project area. Site 45CA426 provides evidence of tool-making technologies dating back as far as 4,000-8,000 years before present (YBP) as well as documentation of S'Klallam utilization/management of the spə́ɬxən (Sequim Prairie) as recent as 170 YBP.

The THPO highly recommends a cultural resource survey prior to any proposed ground disturbing activities including geotechnical survey. Additionally, the THPO requests advanced notification of scheduled field work and ground disturbing work given its proximity to a significant ancestral site of the Jamestown S'Klallam Tribe. Please feel free to contact me with further questions.

Thank you for the opportunity to comment on this proposed project. If you need any additional information, please contact me at 360-681-4638 or ataylor@jamestowntribe.org .

Sincerely,

Allie Rae Taylor
Tribal Historic Preservation Officer
Jamestown S'Klallam Tribe

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

December 20, 2023

Charisse Deschenes
City of Sequim
152 W. Cedar Street, Sequim, WA 98382

In future correspondence please refer to:
Project Tracking Code: 2023-12-08337
Property: Habitat for Humanity Sequim Avenue Development
Re: Archaeology - Survey Requested

SEPA – Survey Requested

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance Washington State law. If any federal or state capital funds are associated with this proposal, Section 106 of the National Historic Preservation Act and Governor's Executive Order 21-02 respectively apply. Should additional information become available, our assessment may be revised.

Our records show that there is a very high probability of encountering cultural resources within the proposed project area, with a significant archaeological site (45CA426) extending onto the parcel. Portions of the site have been subject to data recovery in the past, but much of the site remains unexcavated, and its full extent is unknown. Further, the scale of the proposed ground disturbing actions would destroy any archaeological resources present. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey of the project area be conducted and a report be produced prior to ground disturbing activities. This report should meet DAHP's Standards for Cultural Resource Reporting.

We also recommend that any historic buildings or structures (45 years in age or older) located within the project area are evaluated for eligibility for listing in the National Register of Historic Places on Historic Property Inventory (HPI) forms. We highly encourage the SEPA lead agency to ensure that these evaluations are written by a cultural resource professional meeting the SOI Professional Qualification Standards in Architectural History.

Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving any

correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.

Thank you for the opportunity to comment on this project. Please ensure that the DAHP Project Tracking Number is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. Please also ensure that any reports, site forms, and/or historic property inventory (HPI) forms are uploaded to WISAARD by the consultant(s).

Should you have any questions, please feel free to contact me.

Sincerely,



Lance Wollwage, Ph.D.
State Archaeologist
(360) 890-2616
lance.wollwage@dahp.wa.gov

Appendix B:
Shovel Probe Table

Table B-1. Summary of Shovel Probe Results.

SP #	Depth (cmbs)	Sediment Characteristics	Interpretation	Cultural Material
1	0–20	Dark grayish-brown silty fine sand; few subangular to rounded pebbles; common medium roots; abrupt way boundary.	A horizon	None
	20–60	Light grayish-brown very fine sandy silt; common subangular to rounded pebbles to cobbles; few fine roots; common orange mottles; gray redoximorphic patches increase with depth; light compaction; clear, smooth boundary.	B horizon	None
	60–80	Dark brown fine to medium sand; common subrounded pebbles to cobbles; few charcoal flecks, no concentrations or associated cultural materials; very few fine roots; SP terminated within culturally sterile glacial outwash material.	C horizon	None
2	0–48	Dark grayish-brown silty fine to medium sand; few subangular to rounded pebbles to cobbles; common fine roots; trace charcoal flecks; abrupt, smooth boundary; lower boundary appears to be artificially truncated.	A/B horizon (mixed)	None
	48–80	Very light gray fine silt; common subangular to rounded pebbles to cobbles; few orange redoximorphic mottles; lens of burnt wood at upper boundary in east wall, approximately 8 cm thick, no associated cultural materials, the burn appears natural; SP terminated within culturally sterile glacial outwash material.	C horizon	None
3	0–40	Dark brown very fine sandy silt; few subangular to subrounded pebbles and cobbles; many fine roots; clear, wavy boundary.	A horizon	None
	40–70	Dark yellowish-brown very fine sandy silt (small percentage of clay); common subrounded to subangular pebbles and cobbles; few small charcoal fragments; no concentrations or associated cultural materials; SP terminated on large cobbles greater than 10 cm in diameter at 70 cmbs.	B horizon	None
4	0–27	Dark brown very fine sandy silt; common subangular to subrounded pebbles and few cobbles; many fine roots; clear, wavy boundary.	A horizon	None
	27–65	Dark yellowish-brown silty fine sand; common subangular to subrounded pebbles and cobbles; common fine roots; clear, smooth boundary.	B horizon	None
	65–70	Pale brown silty fine to medium sand; many subangular to subrounded pebbles and cobbles; very compact; saturated; SP terminated within culturally sterile glacial outwash material.	C horizon	None
5	0–25	Dark brown very fine sandy silt; few subrounded to subangular pebbles to cobbles; many fine roots; clear, wavy boundary.	A horizon	None
	25–60	Dark yellowish-brown silty fine sand; few subangular to subrounded pebbles to cobbles; few fine roots; common fine orange mottles; sediment is noticeably sandier and lighter colored at the base of the stratum, which could indicate the B/C horizon boundary.	B/C horizon	None
6	0–20	Dark brown very fine sandy silt; common subrounded pebbles to cobbles; very many fine to very fine roots; clear, wavy boundary.	A horizon	None
	20–60	Dark yellowish-brown silty clay; many subangular to subrounded pebbles to cobbles; few charcoal fleck, no concentrations; many small orange mottles; common fine roots; SP terminated at large cobbles.	B horizon	None

Table B-1. Summary of Shovel Probe Results. Continued.

SP #	Depth (cmbs)	Sediment Characteristics	Interpretation	Cultural Material
7	0–36	Dark brown very fine sandy silt; common subangular to subrounded pebbles to cobbles; many fine grass roots; encountered groundwater at 30 cmbs; sediment is very wet throughout; clear, wavy boundary.	A horizon	None
	36–55	Grayish-brown fine sandy silt; many subangular to subrounded pebbles to cobbles; few fine roots; may be hitting glacial parent material at base of probe, but difficult to determine definitely as the boundary is below the current water level; terminated on large cobbles.	B horizon	None
8	0–55	Very dark grayish-brown silty very fine to medium sand; subangular to rounded pebbles to cobbles; many fine to very fine roots; groundwater encountered on the surface, standing water in the immediate vicinity; clear boundary.	A/B horizon (mixed)	None
	55–70	Light gray fine to medium sand; subangular to rounded pebbles to cobbles; inundated with water.	C horizon	None
9	0–23	Dark grayish-brown very fine sandy silt; common subangular to rounded pebbles to cobbles; many fine to very fine roots; abrupt, smooth boundary.	A horizon	None
	23–75	Medium pale brown silt with small percentage of fine sand; common subangular to rounded pebbles to cobbles; common orange and gray redox mottles; moderately compact; gradual, smooth boundary.	B horizon	None
	75–90	Light grayish-brown silt; many subangular to rounded pebbles to cobbles; strong peds, moderately compact. SP terminated within culturally sterile glacial outwash material.	C horizon	None
10	0–26	Dark brown very fine sandy silt; few subangular to subrounded pebbles to cobbles; many fine roots; clear, wavy boundary.	A horizon	None
	26–50	Dark yellowish-brown silty clay; common subangular to subrounded pebbles to cobbles; many fine orange mottles; common fine roots; apparent root burn on east side of probe, no associated cultural material; gradual, smooth boundary.	B horizon	None
	50–80	Pale brown silty clay with a small percentage of fine sand; many subangular to subrounded pebbles to cobbles; SP terminated within culturally sterile glacial outwash material.	C horizon	None