

STATE AGENCIES

APPENDIX E-2



**Washington State
Department of Transportation**

Lynn Peterson
Secretary of Transportation

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May 4, 2015

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Department of Archaeology & Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

RE: I-5 / JBLM Vicinity Improvement Project,
Section 106 Consultation and Area of Potential Effects

Dear Dr. Brooks:

The Washington State Department of Transportation (WSDOT), in cooperation with the Federal Highway Administration (FHWA), is developing the I-5 / Joint Base Lewis-McChord (JBLM) Vicinity Improvement project to address a transportation need in Pierce County. In order to ensure that WSDOT takes into account the effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places, we are initiating formal Section 106 consultation pursuant to 36 CFR § 800.2(c)(4), under delegated authority from FHWA. We are inviting you to comment on the draft Area of Potential Effects (APE) required under Section 106 of the National Historic Preservation Act and 36 CFR 800.

The proposed project will make improvements along the I-5 corridor between the interchanges with Gravelly Lake Drive and Mounts Road to relieve chronic traffic congestion and improve person and freight mobility. The improvements are proposed to be implemented in two phases, the first phase to be built upon availability of funding. The second phase would be implemented in the future when warranted by traffic demand and resulting congestion.

The first phase of improvements would include the following:

- Rebuild the interchange at Thorne Lane (exit 123)
- Rebuild the interchange at Berkeley Street (exit 122)
- Rebuild the interchange at Steilacoom DuPont Road (exit 119)
- Widen I-5 between Thorne Lane and Steilacoom DuPont Road to add one HOV lane both northbound and southbound
- Build a bicycle/pedestrian facility along the I-5 corridor in the JBLM area
- Build a local road connection between Gravelly Lake Drive and Thorne Lane

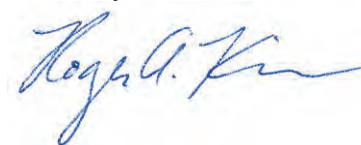
The future phase of improvements would include the following:

- Widen I-5 between Gravelly Lake Drive and Center Drive to add one managed lane both northbound and southbound (total of five through lanes each direction). These lanes would be in an express lane configuration together with the HOV lanes built in the first phase.
- Revisions to the 41st Division/Main Gate interchange as needed to allow for the I-5 mainline lanes
- Possible revisions to the interchanges with Gravelly Lake Drive and Center Drive to allow for the I-5 mainline lanes

The proposed project is located between I-5 milepost (MP) 116.5 and MP 124.8 in Section 3 of Township 18 North, Range 1 East; Sections 25, 34, 35, and 36 of Township 19 North, Range 1 East; and Sections 14, 15, 20, 21, 22, 28, 29, 30, and 31 of Township 19 North, Range 2 East. We initially define the APE as shown on the enclosed exhibits to include areas that would be directly impacted by the above improvements, as well as areas that may be indirectly affected. Areas of potential indirect effects were generally defined as extending one tax parcel out from the direct impact area, in all areas where tax parcels border the corridor. Where the corridor is bordered by large tracts of JBLM, the area of potential indirect effects has been drawn 200 feet from the edge of the proposed direct impact area.

We invite your review of the project APE. If you have questions or comments regarding the proposed project, you may contact me by phone at 360-570-6638, or by email at kiersro@wsdot.wa.gov.

Sincerely,



Roger Kiers
WSDOT Archaeologist

Enclosures: APE exhibits (6)

cc: Dale Sadler, JBLM Cultural Resources, w/ enclosures
Jeff Sawyer, WSDOT Olympic Region EHS, w/ enclosures



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

May 6, 2015

Mr. Roger Kiers
Cultural Resources Specialist
WSDOT, Olympic Region
P.O. Box 47332
Olympia, WA 98512-7332

In future correspondence please refer to:
Log: 050615-08-FHWA
Property: I5 / JBLM Vicinity Improvements Project
Re: Archaeology - APE Concur

Dear Mr. Kiers:

We have reviewed the materials forwarded to our office for the above referenced project. Thank you for your description of the area of potential effect (APE) for the project. We concur with the definition of the APE. We look forward to the results of your cultural resources survey efforts, your consultation with the concerned tribes, and receiving the survey report. We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised.

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

Sincerely,

Lance Wollwage, Ph.D.
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August 23, 2016

Mr. Dennis Wardlaw
Transportation Archaeologist
Department of Archaeology & Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Log: 050615-08-FHWA
RE: I-5 / JBLM Vicinity Improvement Project,
Section 106 Consultation and Cultural Resources Assessment

Dear Mr. Wardlaw:

The Washington State Department of Transportation (WSDOT), in cooperation with the Federal Highway Administration (FHWA), is continuing to develop the I-5 / Joint Base Lewis-McChord (JBLM) Vicinity Improvement Project to address a transportation need in Pierce County. In order to ensure that WSDOT takes into account the effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places (NRHP), we are continuing formal Section 106 consultation pursuant to 36 CFR § 800.2(c)(4), under delegated authority from FHWA. We are inviting you to review a revised Area of Potential Effects (APE) and the cultural resources assessment prepared for the undertaking.

The proposed project will make improvements along the I-5 corridor between the interchanges with Thorne Lane (Exit 123) and Mounts Road (Exit 116) to relieve chronic traffic congestion and improve person and freight mobility. The project has been separated into two pieces, which are described in the enclosed report as the North and South Study Areas. The North Study Area encompasses the current Build Alternative, which will include widening of I-5 between Thorne Lane and the vicinity of the DuPont-Steilacoom Interchange (Exit 119), as well as reconstruction of the Thorne Lane and Berkeley Street Interchanges to accommodate the additional lanes on I-5, a new auxiliary lane to be added northbound between the Berkeley Street on-ramp and the Thorne Lane off-ramp, a northbound auxiliary lane from the Thorne Lane on-ramp to the Gravelly Lake Drive off-ramp, a new local roadway between Thorne Lane and Gravelly Lake Drive (Gravelly-Thorne Connector), and a new pathway for non-motorized users to the north of the highway between the communities of Tillicum and DuPont. Within an area of overlap between the North and South Study Areas, improvements relate primarily to the I-5 mainline.

The South Study Area ranges from north of the DuPont-Steilacoom Interchange to the Mounts Road Interchange. Future improvements within the South Study Area may include modification of the DuPont-Steilacoom Interchange, the Center Drive Interchange, and/or improvements to the I-5 mainline such as new travel lanes. However, specific improvements

remain unknown at this time, and effects of those improvements will be determined when designs are finalized.

Since submitting the original APE, project revisions have included the addition of the bicycle/pedestrian path, as well as revisions at interchanges as project design has advanced. The project footprint has contracted at the south end of the corridor between MP 116 and 119 after eliminating some elements that would be completed as part of future improvements. As before, we have defined the APE, as shown on Figures 2 through 5 of the enclosed report, to include areas that would be directly impacted by the proposed improvements, as well as areas that may be indirectly affected. Areas of potential indirect effects were generally defined as extending one tax parcel out from the direct impact area, in all areas where tax parcels border the corridor. Where the corridor is bordered by large tracts of JBLM, the area of potential indirect effects has been drawn 200 feet from the edge of the proposed direct impact area.

Aqua Terra Cultural Resource Consultants (ATCRC) has completed a cultural resources assessment of the APE. As documented in the enclosed report, the cultural resources survey identified 11 archaeological sites within the APE.

Two of these sites are considered NRHP-eligible based on previous research. Site **45PI00521**, the Murray Farmstead, was previously recommended as eligible in 2006 based on its potential to contribute significant historical information on the pre-Camp Lewis period at JBLM, including the pioneer-era settlement of the area. Specifically, two clusters within the site (Clusters A and B) were identified as contributing elements to the site's eligibility. An area within the site identified as Orchard C was identified as a non-contributing element. Data recovery excavations were conducted by AMEC at site 45PI00521 in 2012 because of proposed JBLM construction activities that were going to impact the site.

During the course of AMEC's archaeological investigations at site 45PI00521, no significant historic-period archaeological material or building foundations were identified that could further contribute information toward a better understanding of the pre-Camp Lewis pioneer-era settlement of the area. AMEC found that Cluster A maintains a moderate density of historic period artifacts that are directly associated with the site's period of significance, while Cluster B does not. AMEC's archaeological investigations at site 45PI00521 also uncovered evidence of both pre-contact and contact/ethnographic period archaeological material. AMEC concluded their investigation by recommending that any ground disturbing activity that has the potential to disturb site deposits in close proximity to the documented pre-contact or contact period artifacts, or the historic component identified as Cluster A, should be monitored by a professional archaeologist. Current I-5/JBLM project plans include roadway construction directly east of Jackson Ave., in an area where two pieces of lithic debitage from a disturbed context had been identified by AMEC. No construction is planned in the vicinity of Cluster A. Construction will also occur directly west of Jackson Ave, but not as far west as Orchard C. Based on the previous work at the site, WSDOT concludes that the site will not be adversely affected by the I-5/JBLM Vicinity Improvement Project. As recommended by ATCRC, however, archaeological monitoring may be warranted during ground-disturbing activities on the east side of Jackson Ave.

The other eligible archaeological site within the APE is the Greene Park site, **45PI01316**, which consists of surface artifact scatters, subsurface archaeological deposits in mostly disturbed contexts, historic roadways, non-native vegetation, and building foundations associated with recreation at Camp Lewis from 1917-1934. The site was tested extensively on two previous occasions in 2013 and 2015; the 2015 archaeological survey work expanded the site boundaries to cover 60 acres at JBLM.

Subsurface testing conducted by previous researchers and by ATCRC during the current investigation was negative through the southwestern half of the currently planned project area within Greene Park. During the period of historic significance, most of the portion of the site within the current APE was the location of South Drive, which bordered Greene Park on the south. Shovel probes in the northeastern half of the project area at Greene Park recorded a scatter of artifacts in a disturbed context. Proposed project activities within the Greene Park site include cut and fill for the construction of a bicycle/pedestrian path, as well as utility and fence installation. These activities will occur along the abandoned roadbed. Archaeological materials found within this roadbed do not retain their integrity to convey the significance of this historic archaeological site, and WSDOT concludes that the site will not be adversely affected by the I-5/JBLM Vicinity Improvement Project build alternative. However, ATCRC recommends archaeological monitoring during project excavation within site 45PI01316.

A portion of site 45PI01316 is also located in the South Study Area, so potential effects to the site should be further assessed once a project footprint is established for the South Study Area.

Other previously recorded archaeological sites within the APE include sites **45PI00768**, **45PI00769**, **45PI01031**, and **45PI01242**. The Tillicum (45PI00768) and Camp Lewis (45PI00769) railroad stations were previously determined not eligible for listing on the NRHP. Site 45PI01031 was originally recorded as the Arboretum Refuse Site due to its location within an arboretum on JBLM. Previous work at site 45PI01031 included testing and delineation, and determined the site was not eligible for the NRHP. Subsequent research by JBLM staff indicated the site might be associated with significant historic events at Fort Lewis, given its location on the outskirts of the 1917 Joy Zone, and within the WWII-era South Fort Lewis, which was a temporary cantonment for segregated soldiers. ATCRC's subsurface testing in the site vicinity has resulted in the expansion of the 45PI01031 site boundary. Most of site 45PI01031 was found to be disturbed, containing the highly fragmented remnants from the demolition of South Fort Lewis. Newly identified site materials are similar to those previously recorded in the western portion of the site, including small fragments of structural materials and bituminous coal. The site also contains abandoned sections of Clark and Locust Roads, which were abandoned around the time of I-5 construction. While archaeological site 45PI01031 is associated with a significant period at Fort Lewis, it does not appear to retain the potential to yield data that addresses important research questions. Intensive shovel probe testing of the site suggests there is very low potential to encounter small pockets of intact archaeological deposits within the site. Therefore, WSDOT maintains a previous determination that the site is not eligible for listing on the NRHP.

Site 45PI01242 consists of abandoned sections of the former North Fort Lewis Railway, which once joined the Northern Pacific Railway line to North Fort Lewis. These lines were

constructed in 1941, in support of training needs at Fort Lewis in preparation for U.S. operations in WWII. A portion of this line located 1.5 miles to the northwest of the current APE was previously recorded as site 45PI01242 and determined not eligible for the NRHP by JBLM. ATCRC identified two additional sections of this railroad within the current APE and has revised the site form accordingly. This portion of the railway is associated with the same historic period and retains similar integrity to the previously recorded section, and WSDOT concludes that the sections of the North Fort Lewis Railway in the APE are similarly not eligible for the NRHP.

Five archaeological sites were newly identified by ATCRC: **45PI01392**, **45PI01393**, **45PI01394**, **45PI01395**, and **45PI01396**.

Site 45PI01392 was identified during monitoring of geotechnical investigations for the project, and consists of historic debris dating as recently as the 1950s buried beneath 7 to 8 feet of highway fill. The site is below the depth of proposed ground disturbance for the project and will not be affected.

Site 45PI01393, the remains of the DuPont School, consists of the graded footprint of demolished school buildings, an abandoned athletic field, associated historic objects, and refuse. The DuPont School relocated to this site in 1919, and expanded and contracted with the Fort Lewis population through the 1960s. No significant archaeological deposits were identified within the site. The western portions of the school grounds, where school buildings were located prior to demolition, does not retain integrity to convey any site significance. The DuPont School athletic field exists in a ruined state, but the field's period of use in the 1960s is not associated with any known significant events or persons. The site is considered not eligible for the NRHP.

Site 45PI01394 is an abandoned section of Lewis Drive on JBLM at the site of the former Liberty Gate. The Liberty Gate on Lewis Drive served as the main entrance to Camp Lewis from its construction in 1918, but the gate was removed during construction of I-5 in 1957. Portions of the former roadbed, associated sidewalk, and landscaping features are still visible here. Previous testing at this location found no subsurface cultural resource material. The site lacks integrity and is considered not eligible for the NRHP.

Site 45PI01395 consists of abandoned sections of Rainier Road, utilities, and mature ornamental vegetation adjacent to the Mount Rainier Ordnance Depot Gate. Shovel probing in this area recorded a subsurface scatter of structural materials in a disturbed context likely associated with construction or demolition activities at the gate. Although the Mount Rainier Ordnance Depot Gate itself is eligible for the NRHP, the archaeological materials at this site lack integrity and are considered not eligible for the NRHP.

Site 45PI01396, the Murray Road Domestic Refuse Scatter, is largely a surficial scatter across 0.4 acres, with materials extending to depths of up to 47 cm below surface. The site assemblage consists of discarded household items, dominated by alimentary, household, and cosmetic containers manufactured sometime between 1903 and 1939. Artifact types include glass, ceramic, metal, faunal remains, and structural fragments. No features have been identified. Artifact manufacture dates peak in the 1920s, suggesting the site may have been used to discard household materials after the Army acquired it in 1917. The site is unlikely to yield important information and is considered not eligible for the NRHP.

ATCRC also recorded or updated 60 aboveground resources within the project APE, 15 of which are recommended eligible for, or are listed on, the NRHP.

The **Northern Pacific Railroad** was previously determined eligible. It is an active Sound Transit line and direct impacts to the railroad will be avoided by the project. I-5 and its predecessors have existed parallel to the line for over 100 years, and WSDOT concludes that the project will not have any adverse indirect effects on the railroad. The Northern Pacific Railroad is also within the South Study Area portion of the APE, and impacts to this resource will be further assessed when project plans in the South Study Area are developed.

The **Salvation Army Red Shield Inn** is listed on the NRHP. A bicycle/pedestrian path will be constructed between the building and the railroad right-of-way, and a local road will be widened toward the building to accommodate the new path. The building underwent structural upgrades and improvements in 2010, but the proximity of proposed project activities necessitated an analysis to evaluate the effects of vibration. WSDOT concluded that potential vibration effects to the historic property can be avoided by 1) prohibiting dynamic compaction within 100 feet of any portion of the building, and 2) prohibiting loaded trucks within 20 feet of the building. Additionally, visual effects, as depicted in Figure 79 of the cultural resources assessment, will not alter the integrity of the property. WSDOT concludes that the project will not cause adverse effects to the building or its setting.

The NRHP-eligible **Fort Lewis Garrison Historic District** and seven contributing buildings within the APE will not be adversely affected by the build alternative. The contributing buildings include: the **Quartermaster Gasoline Filling Station, Warehouses 4079 and 4170, the Red Cross Field Office, the Red Cross Hostess House, and NCO Quarter Buildings 5301 and 5302**. Project work along I-5, which passes through the district, will necessitate the removal of two trees from inside the I-5 right of way fence, near Perimeter Road. The loss of this vegetation does not alter the characteristics that make this district eligible for the NRHP. Similarly, the installation of drainage features and roadway widening on the northern boundary of the district will not diminish the integrity of the historic district or contributing buildings. Planned construction in the vicinity of the Red Cross Hostess House and NCO Quarters Buildings 5301 and 5302 consists of roadway widening approximately 110 feet away from the buildings. WSDOT assessed potential vibration effects at this distance and found that no vibration effects should be expected. The Fort Lewis Garrison Historic District, Quartermaster Gasoline Filling Station, Warehouses 4079 and 4170, and the Red Cross Field Office are located in the South Study Area, so effects to these historic properties would need to be further assessed once project plans are developed for the South Study Area.

The NRHP-eligible **Camp Murray Arsenal and Administrative Building** are within the project APE; project activities in the vicinity of these buildings include the addition of a 4-foot retaining wall along I-5, located 150 feet from these buildings. Given the low profile and distance of the proposed wall from the buildings, the project will not affect the integrity of these properties.

Proposed roadway expansion and movement of the highway right-of-way fence closer to the **Mount Rainier Ordnance Depot Gate**, which was previously determined NRHP-eligible, will not alter the integrity of the historic structure given its current setting near I-5.

The residences at **16 Forest Glen Lane SW** and **29 Forest Glen Lane SW** in Lakewood have been determined eligible for the NRHP by the current study, and would suffer indirect effects through the proposed construction of a new roadway in their vicinity. This minor erosion of setting does not diminish the integrity of the buildings, as there is sufficient buffer to protect the character-defining features of these properties, and they will not be adversely affected.

Based on the results of the cultural resources assessment, WSDOT concludes that no historic properties will be adversely affected by the build alternative of the I-5 / JBLM Vicinity Improvement Project. Given that future improvements within the southern portion of the project APE remain unknown, WSDOT believes that a programmatic agreement should be developed among FHWA, SHPO, JBLM, and other consulting parties in order to outline how effects to historic properties should be assessed and addressed once the project footprint is defined in the South Study Area. Future cultural resource assessments of the South Study Area may include assessment of impacts to the NRHP-eligible Northern Pacific Railroad, Fort Lewis Garrison Historic District, the Quartermaster Gasoline Filling Station, Warehouses 4079 and 4170, the Red Cross Field Office, and archaeological site 45PI01316. Other future work in the South Study Area may include additional archaeological investigations, depending on the project footprint.

We invite your review of the revised APE, cultural resources assessment, historic property determinations, and our determination of No Adverse Effect for the Build Alternative. We look forward to further consultation on a Programmatic Agreement. If you have questions or comments regarding the proposed project, you may contact me by phone at 360-570-6638, or by email at kiersro@wsdot.wa.gov.

Sincerely,



Roger Kiers
WSDOT Archaeologist

Enclosures: *Joint-Base Lewis-McChord Vicinity I-5 Improvement Project Cultural Resources Assessment*, prepared by ATCRC, dated 27 July 2016 (via WISAARD)

cc: Jeff Sawyer, WSDOT Olympic Region EHS
Donna Turnipseed, JBLM Cultural Resources Program
Dean Moberg, FHWA Area Engineer



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

September 19, 2016

Roger Kiers
WA State Dept. of Transportation
P.O. Box 47332
Olympia, WA. 98512-7332

In future correspondence please refer to:
Project Tracking Code: 050615-08-FHWA
Property: I-5 / JBLM Vicinity Improvements Project
Re: More Information Needed

Dear Mr. Kiers:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation regarding the above referenced project. In response, we have reviewed the report you provided for this project. In order to complete our review we request the following information be provided to our office:

- There are inconsistencies between the above ground resources reported in Table 9 of the report and what has been uploaded in the WISAARD that need to be resolved. There also needs to be clarification on why the fort rookery, some base housing (specifically along Perimeter Road), and other historic –era built environment properties in the APE were not inventoried. If these properties were excluded from evaluation for a specific reason, then the rationale for excluding these properties needs to be provided.
- Clarification is needed regarding the previous work in the project area (Page 26). If the previous work was used to justify no additional testing in any area then this needs to be discussed. A map depicting previous work in the project area would also be useful.
- More information is needed for each archaeological site in the results section. Each site should have individual maps, photos, and an expanded discussion on the number of shovel tests, soil types observed, and artifacts recorded.
- A more thorough analysis and discussion is needed in the results section for Site 45PI1031. Page three of the site form for states that shovel test DD008 has artifacts representing an early historic period occupation. However, there are no shovel tests to the immediate east of this location. There are also large gaps in coverage on the eastern portion of the site. More information is needed to clarify why these areas were not tested for subsurface deposits.
- More information is also needed for 45PI1396. The site form states that artifacts range in date from 1903 to 1939, with some artifacts recorded 50 centimeters below the surface. A more thorough analysis of the subsurface artifacts recorded near the core of the site is needed to determine if a potential per-fort cultural deposit is present.

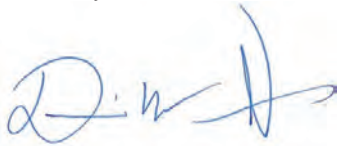


- Finally, there are inconsistencies throughout the report relating to the number of archaeological sites and built environment properties previously recorded and recorded for this project that need to be reconciled.

We appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

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

Sincerely,



Dennis Wardlaw
Transportation Archaeologist
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dennis.wardlaw@dahp.wa.gov





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

February 13, 2017

Mr. Roger Kiers
WA State Dept. of Transportation
P.O. Box 47332
Olympia, WA. 98512-7332

In future correspondence please refer to:
Project Tracking Code: 050615-08-FHWA
Property: I-5 / JBLM Vicinity Improvements Project
Re: No Adverse Effect

Dear Mr. Kiers:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. This action has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication. At this time, this review is based on a phased identification effort, as allowed under 36 CFR Part 800.4(b)(2), by the lead agency and is limited to the Northern Study Area of the proposed project.

First, we concur that the current project as proposed will have "NO ADVERSE EFFECT" on archaeological Sites **45PI00521** and **45PI01316**, both of which have been previously determined eligible for the National Register of Historic Places (NRHP). Our office recommends monitoring for Site **45PI00521** during ground-disturbing activities on the east side of Jackson Avenue.

We concur with your continued determination that Sites **45PI00768**, **45PI00769**, **45PI01031**, and **45PI01242** are not eligible for the NRHP. We also concur that Site **45PI01392**, while not fully evaluated, will not be adversely affected by the proposed project. However, our office does recommend monitoring for ground-disturbing activities in the vicinity of this site.

We also concur that Sites **45PI01393**, **45PI01394**, **45PI01395**, and **45PI01396** are not eligible inclusion in the NRHP.

We concur that the following properties are not eligible for inclusion in the NRHP:

- 8601 Spruce SW (Property #85687)
- 15417 Union SW (#85119)
- 15515 Grant Ave SW (#680525)
- 15515 Grant Ave SW (#680526)
- 15515 Grant Ave SW (#680482)
- 15521 Grant Ave SE (#680483)
- 15525 Grant Ave SW (#680484)
- The Old Hudson's Bay Trail Memorial Park (#680520)
- 13204 Country Club Dr. SW (#680521)
- 13204 Country Club Dr. SW (#680522)



- 13204 Country Club Dr. SW (#680523)
- 15527 grant Ave SW (#680524)
- 5908 Rhode Island SW (#680328)
- 5909 Rhode Island SW (#680329)
- 4079 West Way SW (#680363)
- 15518 Washington Ave SW (#680403)
- 13204 Country Club Dr. (#680418)
- 15526 Washington Ave SW (#680425)
- 15525 Washington AVE SW (#680465)
- 15524 Washington Ave SW (#680466)
- 8307 Berkley St SW (#680467)
- 8405 Berkley St SW (#680468)
- 14721 Murray Rd (#680469)
- The Fort Lewis Memorial Arboretum (#108076)
- 15519 Washington Ave SW (#129260)
- 15523 Washington Ave SW (#129738)
- 8515 Spruce SW (#138547)
- 8409 Spruce SW (#139443)
- 8401 Spruce SE (#140047)
- 15524 Grant SW (#140054)
- 8415 Spruce SW (#142543)
- 15517 Washington SW (#148547)
- 8201 Spruce SW (#148916)
- 15501 Washington SW (#153765)
- 15502 Washington SW (#153766)
- 17 Forest Glen Ln SW (#680024)
- 18 Forest Glen Ln SW (#680025)
- 8202 Berkley St SW (#680220)
- 15514 Washington Ave SW (#680221)
- 8408 Berkley St SW (#680222)
- The Machine Shop & Truck Shed (#680311)
- 5906 Rhode Island Ave SW (#680326)
- 5907 Rhode Island Ave SW (#680327)
- The Hudson Bay Company Monument (#705488)
- 5912 Rhode Island Ave (#706771)
- Building 8094 (#708508)
- Building T08095 (#708510)

We concur that the property located at **8311 Spruce SW** (#142271) is eligible for the NRHP under Criteria C, but will not be affected by the proposed project. We concur that the proposed project will have “NO ADVERSE AFFECT” on **Northern Pacific Railroad** (#678715) and the **Salvation Army Red Shield Inn** (#41777).

We concur that the proposed project will have “NO ADVERSE AFFECT” on The **Fort Lewis Garrison Historic District**, which contains the **Quartermaster Gasoline Filling Station** (#680366), **Warehouses 4079** and **4170** (#680365), the **Red Cross Field Office** (#680367), the **Red Cross Hostess House** (#114474), and **NCO Quarter Buildings 5301** (#680369) and **5302** (#680368). Finally, we concur that the proposed project will have “NO ADVERSE AFFECT” on the **Camp Murray Arsenal** (#66822), the **Administrative Building** (#668202), the **Mount Rainier Ordnance Depot Gate** (#55193), the residences at **16 Forest Glen Lane SW** (#680023), and **29 Forest Glen Lane SE** (#680026).

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Our office looks forward to working with you to develop a programmatic agreement. If new information about affected resources becomes available and/or the project scope of work changes significantly, please resume consultation as our assessment may be revised. Also, if any archaeological resources are uncovered during construction, please halt work immediately in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

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

Sincerely,



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