TRIBAL CORRESPONDENCE PURPOSE AND SCOPE OF CONSULTATION

APPENDIX E-3

Through the consultation exchange of letters following, we want to ensure that the Tribal Governments are afforded the opportunity to:

- Identify any concerns they may have regarding the effects of the proposed undertaking on historic properties;
- Advise FHWA and WSDOT on the identification and evaluation of historic properties, including those of traditional religious and cultural importance;
- Express their views on the undertaking’s effects on such properties; and,
- Participate in the resolution of any adverse effects which the undertaking might have on their properties.

The first step in the Section 106 process, prior to the identification and evaluation of historic properties, is to identify the area of potential effect. Area of potential effect means the geographic area or areas within which the proposed undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The participation by the tribes as a consulting party in determining the area of potential effect is critical and is invited. Once this area has been defined, a cultural resources survey will be initiated. If the tribe has information about traditional cultural areas that might be affected by the proposed undertaking, their input will be a valuable contribution to the cultural resources survey effort.

Once historic properties have been identified and evaluated for their historical significance in accordance with the criteria of the Keeper of the National Register of Historic Places, the effects of the proposed undertaking on any properties determined to be listed in or eligible for listing in the National Register are assessed. The tribe’s participation in this effort is invited.

As defined by the Advisory Council on Historic Preservation, consultation means “...the process of seeking, discussing, and considering the views of other participants and, where feasible, seeking agreement with them regarding matters arising in the section 106 process.”

Consultation is fundamental to the process of seeking ways to avoid, minimize or mitigate the effects of the undertaking on historic properties. Consequently, the tribe’s active participation as a consulting party in the proposed undertaking is encouraged.

The letter exchange to document our consultation efforts follows.
May 5, 2015

The Honorable Cynthia Iyall, Chairperson
Nisqually Tribe
4820 She-Nah-Num Dr SE
Olympia, WA 98513

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

Dear Chairperson Iyall:

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)
The Honorable Cynthia Iyall  
May 5, 2015  
Page 2

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 ask that you comment on the enclosed draft APE, identify any traditional cultural properties that may exist within the project’s APE, and identify any key tribal contacts. Should you have any comments regarding the draft APE, please provide a response by June 12, 2015 so we may discuss this undertaking and any identified areas of interest. Should you have any questions, please contact me at 360-570-6701, or by e-mail at SawyerJ@wsdot.wa.gov.

Sincerely,

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region

JBS:pd:ip

Enclosures:  
Purpose and Scope  
APE exhibits (6)

cc w/enc:  
Jackie Wall, Nisqually Tribe Cultural Resources  
Annette Bullchild, Nisqually Tribe Cultural Resources  
David Troutt, Nisqually Tribe Natural Resources  
Jim Longley, Nisqually Tribe Planning  
Donna Turnipseed, JBLM Cultural Resources Manager  
Bill Elliott, WSDOT Olympic Region Plans Engineer  
Project File  
SF08052015 (7220)
May 5, 2015

The Honorable Bill Sterud, Chairperson
Puyallup Tribe
3009 Portland Ave
Tacoma, WA 98404

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

Dear Chairperson Sterud:

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 Gravely 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.

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- Build a bicycle/pedestrian facility along the I-5 corridor in the JBLM area
- Build a local road connection between Gravely Lake Drive and Thorne Lane

The future phase of improvements would include the following:
- Widen I-5 between Gravely 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 ask that you comment on the enclosed draft APE, identify any traditional cultural properties that may exist within the project's APE, and identify any key tribal contacts. Should you have any comments regarding the draft APE, please provide a response by June 12, 2015 so we may discuss this undertaking and any identified areas of interest. Should you have any questions, please contact me at 360-570-6701, or by e-mail at SawyerJ@wsdot.wa.gov.

Sincerely,

[Signature]

Jeff Sawyer
Environmental & Hydraulic Manager
Olympic Region

JBS:pd:ip

Enclosures: Purpose and Scope
APE exhibits (6)

cc w/enc: Brandon Reynon, Puyallup Tribe Cultural Resources
Bill Sullivan, Puyallup Tribe Natural Resources
Andrew Strobel, Puyallup Tribe Planning
Donna Turnipseed, JBLM Cultural Resources Manager
Bill Elliott, WSDOT Olympic Region Plans Engineer
Project File
SF05052015 (7221)
May 5, 2015

The Honorable David Lopeman, Chairperson
Squaxin Island Tribe
SE 10 Squaxin Lane
Shelton, WA 98584

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

Dear Chairperson Lopeman:

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.

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- 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
The Honorable David Lopeman  
May 5, 2015  
Page 2

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.

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Sincerely,

[Signature]
Jeff Sawyer
Environmental & Hydraulic Manager
Olympic Region

JBS:pd:ip

Enclosures: Purpose and Scope  
APE exhibits (6)

cc w/enc: Rhonda Foster, Squaxin Island Tribe Cultural Resources  
Andy Whitener, Squaxin Island Tribe Natural Resources  
Kevin Dragon, Squaxin Island Tribe Planning  
Donna Turnipseed, JBLM Cultural Resources Manager  
Bill Elliott, WSDOT Olympic Region Plans Engineer  
Project File  
SF05052015 (7222)
May 5, 2015

The Honorable JoDe Goudy, Chairperson
Yakama Nation
PO Box 151
Toppenish, WA 98948

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

Dear Chairperson Goudy:

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.

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- 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
The Honorable JoDe Goudy  
May 5, 2015  
Page 2

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  
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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 ask that you comment on the enclosed draft APE, identify any traditional cultural  
properties that may exist within the project’s APE, and identify any key tribal contacts.  
Should you have any comments regarding the draft APE, please provide a response by  
June 12, 2015 so we may discuss this undertaking and any identified areas of interest.  
Should you have any questions, please contact me at 360-570-6701, or by e-mail at  
SawyerJ@wsdot.wa.gov. 

Sincerely,  

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region  

JBS:pd:ip

Enclosures:  
Purpose and Scope  
APE exhibits (6)  

cc w/enc:  
Johnson Meninick, Yakama Nation Cultural Resources  
Philip Rigdon, Yakama Nation Natural Resources  
Alvin Pinkham, Yakama Nation Planning  
Donna Turnipseed, JBLM Cultural Resources Manager  
Bill Elliott, WSDOT Olympic Region Plans Engineer  
Project File  
SF05052015 (7223)
The Honorable Farron McCloud, Chairperson
Nisqually Tribe
4820 She-Nah-Num Dr SE
Olympia, WA 98513

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

Dear Chairperson McCloud:

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, 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 comment on the revised Area of Potential Effects (APE) required under Section 106 of the National Historic Preservation Act and 36 CFR 800.

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- The Shared Use path is no longer routed around the Center Drive I/C (Exit 118).
- There is a Shared Use path revision on southbound I-5 near MP 118.
- There are revisions to the proposed interchange design at Steilacoom-DuPont I/C (Exit 119).
- The APE is widened on the southbound side between MP 119 and the Berkeley I/C to accommodate revision to Shared Use path.
- The APE is reduced on the northbound side of the 41st Division Main Gate I/C due to revision of the Shared Use path (i.e. no longer going around ramps).
- The APE is locally expanded near MP 122 to accommodate Shared Use bridge over I-5.
- There are revisions to the proposed interchange design at Berkely I/C (Exit 122).
The Honorable Farron McCloud  
October 22, 2015  
Page 2

- The APE is expanded to show the entire parcels being affected between the Thorne Lane and Gravelly Lake I/C’s (Exits 123 & 124).
- The APE is reduced on the northbound side between the Thorne Lane and Gravelly Lake I/C’s (Exits 123 & 124) due to the elimination of a connector route alternative.

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Sincerely,

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region

Enclosures: APE exhibits (6)

cc: Jackie Wall, Nisqually Tribe Cultural Resources  
    David Troutt, Nisqually Tribe Natural Resources  
    Jim Longley, Nisqually Tribe Planning  
    Donna Turnipseed, JBLM Cultural Resources  
    Bill Elliott, WSDOT Olympic Region Plans Engineer  
    Project File  
    SF10222015 (7325)
Figure 1. I-5 JBLM Vicinity Improvement project, milepost 116-121.
Figure 2. I-5 JBLM Vicinity Improvement project, milepost 120-123.
Figure 3. I-5 JBLM Vicinity Improvement project, milepost 122-125.
Revisions to proposed interchange design at Steilacoom-DuPont I/C

Revision to Shared Use path near MP 118

Steilacoom-DuPont Road Interchange

Center Drive Interchange

Mounts Road Interchange

41st Division Main Gate Interchange

The Shared Use path is no longer routed around the Center Drive I/C

Figure 4. I-5 JBLM Vicinity Improvement project APE changes, milepost 116-121.
Figure 5. I-5 JBLM Vicinity Improvement project APE changes, milepost 119-123.
Figure 6. I-5 JBLM Vicinity Improvement project APE changes, milepost 122-125.
October 22, 2015

The Honorable Bill Sterud, Chairperson
Puyallup Tribe
3009 Portland Ave
Tacoma, WA 98404

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

Dear Chairperson Sterud:

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, 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 comment on the revised Area of Potential Effects (APE) required under Section 106 of the National Historic Preservation Act and 36 CFR 800.

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- There are revisions to the proposed interchange design at Berkeley I/C (Exit 122).
The Honorable Bill Sterud  
October 22, 2015  
Page 2

- The APE is expanded to show the entire parcels being affected between the Thorne Lane and Gravelly Lake I/C’s (Exits 123 &124).
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Sincerely,

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region

Enclosures:  APE exhibits (6)

cc:  Brandon Reyon, Puyallup Tribe Cultural Resources  
     Bill Sullivan, Puyallup Tribe Natural Resources  
     Andrew Strobel, Puyallup Tribe Planning  
     Donna Turnipseed, JBLM Cultural Resources  
     Bill Elliott, WSDOT Olympic Region Plans Engineer  
     Project File  
     SF10222015 (7326)
Figure 1. I-5 JBLM Vicinity Improvement project, milepost 116-121.
Figure 2. I-5 JBLM Vicinity Improvement project, milepost 120-123.
Revisions to proposed interchange design at Steilacoom-DuPont I/C

Revision to Shared Use path near MP 118

Steilacoom-DuPont Road Interchange

Center Drive Interchange

Mounts Road Interchange

The Shared Use path is no longer routed around the Center Drive I/C

---

Figure 4. I-5 JBLM Vicinity Improvement project APE changes, milepost 116-121.
APE is widened between MP 119 and Berkeley I/C to accommodate Shared Use path.

APE is locally expanded to accommodate Shared Use bridge over I-5.

APE is reduced at 41st Division Main Gate I/C due to revision of Shared Use path (no longer going around ramps).

Figure 5. I-5 JBLM Vicinity Improvement project APE changes, milepost 119-123.
Figure 6. I-5 JBLM Vicinity Improvement project APE changes, milepost 122-125.

APE expanded to show entire parcels being affected between the Thorne Lane and Gravelly Lake I/Cs.

Revisions to proposed interchange design at Berkeley I/C.

APE reduced between Thorne Lane and Gravelly Lake I/Cs due to elimination of a connector route alternative.
The Honorable David Lopeman, Chairperson
Squaxin Island Tribe
SE 10 Squaxin Lane
Shelton, WA 98584

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

Dear Chairperson Lopeman:

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The Honorable Farron McCloud  
November 9, 2015  
Page 2

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Sincerely,

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region

Enclosures: APE exhibits (6)

cc: Rhonda Foster, Squaxin Island Tribe Cultural Resources  
Andy Whitener, Squaxin Island Tribe Natural Resources  
Kevin Dragon, Squaxin Island Tribe Planning  
Donna Turnipseed, JBLM Cultural Resources  
Bill Elliott, WSDOT Olympic Region Plans Engineer  
Project File  
SF11092015 (7337)
The Honorable JoDe Goudy, Chairperson
Yakama Nation
PO Box 151
Toppenish, WA 98948

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

Dear Chairperson Goudy:

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, 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 comment on the revised 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. Since initiating Section 106 consultation with your tribe in May 2015, the APE has been revised to include changes to a proposed Shared Use path, and to incorporate design changes at interchanges and other areas, as specified below and depicted on the enclosed sheets. Please note the following specific changes:

- The Shared Use path is no longer routed around the Center Drive I/C (Exit 118).
- There is a Shared Use path revision on southbound I-5 near MP 118.
- There are revisions to the proposed interchange design at Steilacoom-DuPont I/C (Exit 119).
- The APE is widened on the southbound side between MP 119 and the Berkeley I/C to accommodate revision to Shared Use path.
- The APE is reduced on the northbound side of the 41st Division Main Gate I/C due to revision of the Shared Use path (i.e. no longer going around ramps).
- The APE is locally expanded near MP 122 to accommodate Shared Use bridge over I-5.
- There are revisions to the proposed interchange design at Berkeley I/C (Exit 122).
The APE is expanded to show the entire parcels being affected between the Thorne Lane and Gravelly Lake I/C’s (Exits 123 & 124).

- The APE is reduced on the northbound side between the Thorne Lane and Gravelly Lake I/C’s (Exits 123 & 124) due to the elimination of a connector route alternative.

As before, we have defined the APE as shown on the enclosed exhibits 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.

We ask that you comment on the enclosed revised APE, identify any traditional cultural properties that may exist within the project’s APE, and identify any key tribal contacts. If you have any comments regarding the draft APE, please provide a response by November 30, 2015 so we may discuss this undertaking and any identified areas of interest. Should you have any questions, please contact me at 360-570-6701, or by e-mail at SawyerJ@wsdot.wa.gov.

Sincerely,

Jeff Sawyer
Environmental & Hydraulic Manager
Olympic Region

Enclosures: APE exhibits (6)

cc: Johnson Meninick, Yakama Nation Cultural Resources
    Philip Rigdon, Yakama Nation Natural Resources
    Alvin Pinkham, Yakama Nation Planning
    Donna Turnipseed, JBLM Cultural Resources
    Bill Elliott, WSDOT Olympic Region Plans Engineer
    Project File
    SF10222015 (7327)
Figure 1. I-5 JBLM Vicinity Improvement project, milepost 116-121.
Figure 2. I-5 JBLM Vicinity Improvement project, milepost 120-123.
Figure 3. I-5 JBLM Vicinity Improvement project, milepost 122-125.
Figure 4. I-5 JBLM Vicinity Improvement project APE changes, milepost 116-121.
APE is widened between MP 119 and Berkeley I/C to accommodate Shared Use path.

APE is locally expanded to accommodate Shared Use bridge over I-5.

APE is reduced at 41st Division Main Gate I/C due to revision of Shared Use path (no longer going around ramps).

Figure 5. I-5 JBLM Vicinity Improvement project APE changes, milepost 119-123.
Figure 6. I-5 JBLM Vicinity Improvement project APE changes, milepost 122-125.
June 4, 2015

Jeff Sawyer
WSDOT
PO Box 47440
Olympia, WA 98504-7440

Dear Mr. Sawyer,

The Nisqually Indian Tribe thanks you for the opportunity to comment on:

**Re: I-5/JBLM Vicinity Improvement Project**

The Nisqually Indian Tribe has reviewed the report you provided for the above-named project. There are several prehistoric Archaeological and burial sites near the project area. The Nisqually people have lived in that area for thousands of years. There may be more sites not yet discovered.

The Nisqually Indian Tribe wishes to be contacted by the Archaeological firm that is conducting the Cultural Resource Survey. Thank you for keeping the Nisqually Indian Tribe informed of the progress of this project.

Sincerely,

Jackie Wall
THPO
Nisqually Indian Tribe
(360)456-5221 Ext. 2180
wall.jackie@nisqually-nsn.gov
Dreisbach, Paul

From: Sawyer, Jeff
Sent: Wednesday, July 08, 2015 11:31 AM
To: Stephanie Neil
Cc: Dreisbach, Paul; Kiers, Roger
Subject: I-5/ JBLM Vicinity Improvement Project

Stephanie,

Thanks for the response. Based on the APE consultation and responses we’ve received we will be coordinating fieldwork and further Section 106 consultation with the Nisqually Nation.

Jeff Sawyer
Environmental & Hydraulics Manager
Office: 360.570.6701 | Cell: 360.790.9646
WSDOT Olympic Region | Environmental & Hydraulic Services Office

From: Stephanie Neil [mailto:sneil@squaxin.us]
Sent: Monday, July 06, 2015 2:20 PM
To: Sawyer, Jeff
Subject: I-5/ JBLM Vicinity Improvement Project

Jeff,

Thank you for contacting the Squaxin Island Tribe Cultural Resource Department regarding the above listed project for our review and comment. I apologize for the lateness in this reply. We have had a busy spring. I am responding to you on behalf of Rhonda Foster, THPO. Although the project is within our treaty and traditional area we recommend you consult with the Nisqually and Puyallup regarding cultural resource concerns.

Thank You,

Stephanie Neil
Archaeologist, Squaxin Island Tribe
360-432-3998
sneil@squaxin.us
August 26, 2016

Jeff Sawyer
WSDOT
5720 Capitol Blvd.
Tumwater, WA  98501

Dear Mr. Sawyer,

The Nisqually Indian Tribe thanks you for the opportunity to comment on:

Re:  I-5/JBLM Vicinity Improvement Project
     Section 106 Consultation and Cultural Resources Assessment

The Nisqually Indian Tribe has reviewed the report you provided for the above-named project. The Nisqually Indian Tribe has no further or concerns at this time. I look forward to continuing to hearing from you concerning any further developments. I have referred your letter to legal for review concerning a PA. Please keep me informed if there are any Inadvertent Discoveries of Archaeological Resources/Human Burials.

Sincerely,

Jackie Wall
THPO
Nisqually Indian Tribe
(360)456-5221 Ext. 2180
wall.jackie@nisqually-nsn.gov
February 3, 2017

The Honorable Farron McCloud, Chair
Nisqually Tribe
4820 She-Nah-Num Dr SE
Olympia, WA 98513

RE: I-5 / JBLM Vicinity Improvement Project,
Section 106 Consultation and Revised Cultural Resources Assessment

Dear Chairperson McCloud:

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 the revised 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 Tilloicum 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 further developed.

Aqua Terra Cultural Resource Consultants (ATCRC) has completed a revised cultural resources assessment of the APE. WSDOT transmitted an earlier draft of the enclosed report for your review on August 17, 2016. Since that time, the report has been revised to address comments from consulting parties and to correct, clarify, and improve the overall quality of the document.

As detailed in our previous transmittal, the cultural resources survey identified 11 archaeological sites within the APE. Two of these sites are considered NRHP-eligible based on previous research.
The Honorable Farron McCloud
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Site 45P100521, 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. Based on the previous work at the site, WSDOT concludes that the site will not be adversely affected by the project, but that 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, 45P101316, 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. 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 included cut and fill for the construction of a bicycle/pedestrian path, as well as utility and fence installation, along the abandoned roadbed. Although archaeological materials found within this roadway do not retain their integrity to convey the significance of this historic archaeological site, JBLM has requested that the pedestrian path be built on fill through the site, without cutting into the site, to further minimize effects. Given the condition of the site within the project area WSDOT’s commitment to construct the path on fill, we conclude that the site will not be adversely affected by the Build Alternative. A portion of site 45P101316 is also located in the South Study Area, so potential effects to the site will be further assessed once a project footprint is established for the South Study Area.

Other previously recorded archaeological sites within the APE include sites 45P100768, 45P100769, 45P101031, and 45P101242. The Tillicum (45P100768) and Camp Lewis (45P100769) railroad stations were previously determined not eligible for listing on the NRHP. Site 45P101031 was originally recorded as the Arboretum Refuse Site due to its location within an arboretum on JBLM, and was previously determined not eligible for the NRHP. Further research by JBLM and subsurface testing by ATCRC established that the site was associated with significant historic events, but that the site does not retain its integrity. Therefore, WSDOT maintains a previous determination that the site is not eligible for listing on the NRHP. Site 45P101242 consists of abandoned sections of the former North Fort Lewis Railway, which once joined the Northern Pacific Railway line to North Fort Lewis. A portion of this line located 1.5 miles to the northwest of the current APE was previously recorded as site 45P101242 and determined not eligible for the NRHP by JBLM. The portion of the railway within the APE 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: 45P101392, 45P101393, 45P101394, 45P101395, and 45P101396. Site 45P101392 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 45P101393, 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
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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 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 1912 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 was 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 and WSDOT also recorded or updated 64 above-ground 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 (Constitution Drive) will be widened toward the building to accommodate the new path. Road widening will result in Constitution Drive approaching as close as 12.5 feet to the southeast corner of the museum (roughly 5 feet closer than at present), and will remove a 4-5 ft.-wide strip of grass adjacent to Constitution Drive. The removal of grass and minimal encroachment on the building does not constitute an adverse effect on the Salvation Army Red Shield Inn. Vibratory effects on the Red Shield Inn have also been considered. 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.

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 will 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, FHWA and WSDOT will develop a Programmatic Agreement 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 will likely include additional archaeological investigations, depending on the project footprint. A draft Programmatic
The Honorable Farron McCloud  
February 3, 2017  
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Agreement is enclosed for your review. We invite your participation in the agreement as a concurring party and request a response stating your interest.

We invite your review of the revised cultural resources assessment and draft Programmatic Agreement. If you have any comments, please provide a response by March 1, 2017. Should you have any questions regarding the proposed project, you may contact me by phone at 360-570-6701, or by email at sawyerj@wsdot.wa.gov.

Sincerely,

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region

JBS:pd:rk:ip

Enclosures:  
Joint-Base Lewis-McChord Vicinity I-5 Improvement Project Cultural Resources Assessment, prepared by ATCRC, dated 19 January 2017  
Draft Programmatic Agreement Regarding the Joint-Base Lewis-McChord Vicinity I-5 Improvement Project, Pierce County, Washington

cc: Jackie Wall, Nisqually Tribe Cultural Resources, w/cd  
Bill Elliott, WSDOT Olympic Region Plans Engineer  
Roger Kiers, WSDOT Cultural Resources  
Dennis Wardlaw, DAHP Transportation Archaeologist  
Dean Moberg, FHWA Area Engineer  
Project File
February 3, 2017

The Honorable Bill Sterud, Chair
Puyallup Tribe
3009 Portland Ave
Tacoma, WA 98404

RE: I-5 / JBLM Vicinity Improvement Project,
   Section 106 Consultation and Revised Cultural Resources Assessment

Dear Chairperson Sterud:

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 the revised 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-Stellacoom 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-Stellacoom Interchange to the Mounts Road Interchange. Future improvements within the South Study Area may include modification of the DuPont-Stellacoom 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 further developed.

Aqua Terra Cultural Resource Consultants (ATCRC) has completed a revised cultural resources assessment of the APE. WSDOT transmitted an earlier draft of the enclosed report for your review on August 17, 2016. Since that time, the report has been revised to address comments from consulting parties and to correct, clarify, and improve the overall quality of the document.

As detailed in our previous transmittal, the cultural resources survey identified 11 archaeological sites within the APE. Two of these sites are considered NRHP-eligible based on previous research.
Site **45P100521**, 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. Based on the previous work at the site, WSDOT concludes that the site will not be adversely affected by the project, but that 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, **45P101316**, 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. 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 included cut and fill for the construction of a bicycle/pedestrian path, as well as utility and fence installation, along the abandoned roadbed. Although archaeological materials found within this roadbed do not retain their integrity to convey the significance of this historic archaeological site, JBLM has requested that the pedestrian path be built on fill through the site, without cutting into the site, to further minimize effects. Given the condition of the site within the project area WSDOT’s commitment to construct the path on fill, we conclude that the site will not be adversely affected by the Build Alternative. A portion of site 45P101316 is also located in the South Study Area, so potential effects to the site will be further assessed once a project footprint is established for the South Study Area.

Other previously recorded archaeological sites within the APE include sites **45P100768**, **45P100769**, **45P101031**, and **45P101242**. The Tillicum (45P100768) and Camp Lewis (45P100769) railroad stations were previously determined not eligible for listing on the NRHP. Site 45P101031 was originally recorded as the Arboretum Refuse Site due to its location within an arboretum on JBLM, and was previously determined not eligible for the NRHP. Further research by JBLM and subsurface testing by ATCRC established that the site was associated with significant historic events, but that the site does not retain its integrity. Therefore, WSDOT maintains a previous determination that the site is not eligible for listing on the NRHP. Site 45P101242 consists of abandoned sections of the former North Fort Lewis Railway, which once joined the Northern Pacific Railway line to North Fort Lewis. A portion of this line located 1.5 miles to the northwest of the current APE was previously recorded as site 45P101242 and determined not eligible for the NRHP by JBLM. The portion of the railway within the APE 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: **45P101392, 45P101393, 45P101394, 45P101395, and 45P101396**. Site 45P101392 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 45P101393, 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, do 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 viable 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 1912 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 was 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 and WSDOT also recorded or updated 64 above-ground 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 (Constitution Drive) will be widened toward the building to accommodate the new path. Road widening will result in Constitution Drive approaching as close as 12.5 feet to the southeast corner of the museum (roughly 5 feet closer than at present), and will remove a 4-5 ft.-wide strip of grass adjacent to Constitution Drive. The removal of grass and minimal encroachment on the building does not constitute an adverse effect on the Salvation Army Red Shield Inn. Vibratory effects on the Red Shield Inn have also been considered. The building underwent structural upgrades and improvements in 2010, but the
The Honorable Bill Sterling  
February 3, 2017  
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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.

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 will 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, FHWA and WSDOT will develop a Programmatic Agreement 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 45P01316. Other future work in the South Study Area will likely include additional archaeological investigations, depending on the project footprint. A draft Programmatic
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Agreement is enclosed for your review. We invite your participation in the agreement as a concurring party and request a response stating your interest.

We invite your review of the revised cultural resources assessment and draft Programmatic Agreement. If you have any comments, please provide a response by March 1, 2017. Should you have any questions regarding the proposed project, you may contact me by phone at 360-570-6701, or by email at sawyerj@wsdot.wa.gov.

Sincerely,

[Signature]

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region

JBS:pd:rk:ip  
Enclosures:  
Joint-Base Lewis-McChord Vicinity I-5 Improvement Project Cultural Resources Assessment, prepared by ATCRC, dated 19 January 2017 (cd)

Draft Programmatic Agreement Regarding the Joint-Base Lewis-McChord Vicinity I-5 Improvement Project, Pierce County, Washington

cc: Brandon Reyon, Puyallup Tribe Cultural Resources, w/ cd  
Bill Elliott, WSDOT Olympic Region Plans Engineer  
Roger Kiers, WSDOT Cultural Resources  
Dennis Wardlaw, DAHP Transportation Archaeologist  
Dean Moberg, FHWA Area Engineer  
Project File
February 3, 2017

The Honorable David Lopeman, Chair
Squaxin Island Tribe
SE 10 Squaxin Lane
Shelton, WA 98584

RE: I-5 / JBLM Vicinity Improvement Project,
    Section 106 Consultation and Revised Cultural Resources Assessment

Dear Chairperson Lopeman:

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 the revised 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 further developed.

Aqua Terra Cultural Resource Consultants (ATCRC) has completed a revised cultural resources assessment of the APE. WSDOT transmitted an earlier draft of the enclosed report for your review on August 17, 2016. Since that time, the report has been revised to address comments from consulting parties and to correct, clarify, and improve the overall quality of the document.

As detailed in our previous transmittal, the cultural resources survey identified 11 archaeological sites within the APE. Two of these sites are considered NRHP-eligible based on previous research.
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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. Based on the previous work at the site, WSDOT concludes that the site will not be adversely affected by the project, but that 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. 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 included cut and fill for the construction of a bicycle/pedestrian path, as well as utility and fence installation, along the abandoned roadbed. Although archaeological materials found within this roadbed do not retain their integrity to convey the significance of this historic archaeological site, JBLM has requested that the pedestrian path be built on fill through the site, without cutting into the site, to further minimize effects. Given the condition of the site within the project area WSDOT’s commitment to construct the path on fill, we conclude that the site will not be adversely affected by the Build Alternative. A portion of site 45PI01316 is also located in the South Study Area, so potential effects to the site will 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, and was previously determined not eligible for the NRHP. Further research by JBLM and subsurface testing by ATCRC established that the site was associated with significant historic events, but that the site does not retain its integrity. 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. 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. The portion of the railway within the APE 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 Ordinance 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 Ordinance 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 1912 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 was 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 and WSDOT also recorded or updated 64 above-ground 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 (Constitution Drive) will be widened toward the building to accommodate the new path. Road widening will result in Constitution Drive approaching as close as 12.5 feet to the southeast corner of the museum (roughly 5 feet closer than at present), and will remove a 4-5 ft.-wide strip of grass adjacent to Constitution Drive. The removal of grass and minimal encroachment on the building does not constitute an adverse effect on the Salvation Army Red Shield Inn. Vibratory effects on the Red Shield Inn have also been considered. The building underwent structural upgrades and improvements in 2010, but the
The Honorable David Lopeman  
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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.

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 will 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, FHWA and WSDOT will develop a Programmatic Agreement 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 will likely include additional archaeological investigations, depending on the project footprint. A draft Programmatic
The Honorable David Lopeman
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Agreement is enclosed for your review. We invite your participation in the agreement as a concurring party and request a response stating your interest.

We invite your review of the revised cultural resources assessment and draft Programmatic Agreement. If you have any comments, please provide a response by March 1, 2017. Should you have any questions regarding the proposed project, you may contact me by phone at 360-570-6701, or by email at sawyerj@wsdot.wa.gov.

Sincerely,

[Signature]

Jeff Sawyer
Environmental & Hydraulic Manager
Olympic Region

JBS:pd:rk:ip

Enclosures:

Joint-Base Lewis-McChord Vicinity I-5 Improvement Project Cultural Resources Assessment, prepared by ATCRC, dated 19 January 2017 (cd)

Draft Programmatic Agreement Regarding the Joint-Base Lewis-McChord Vicinity I-5 Improvement Project, Pierce County, Washington

cc: Ronda Foster, Squaxin Island Tribe Cultural Resources, w/ cd
Bill Elliott, WSDOT Olympic Region Plans Engineer
Roger Kiers, WSDOT Cultural Resources
Dennis Wardlaw, DAHP Transportation Archaeologist
Dean Moberg, FHWA Area Engineer
Project File
February 3, 2017

The Honorable JoDe Goudy, Chair
Yakama Nation
PO Box 151
Toppenish, WA 98948

RE: I-5 / JBLM Vicinity Improvement Project,
Section 106 Consultation and Revised Cultural Resources Assessment

Dear Chairperson Goudy:

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 the revised 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 further developed.

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The Honorable JoDe Goudy  
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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. Based on the previous work at the site, WSDOT concludes that the site will not be adversely affected by the project, but that 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. 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 included cut and fill for the construction of a bicycle/pedestrian path, as well as utility and fence installation, along the abandoned roadway. Although archaeological materials found within this roadway do not retain their integrity to convey the significance of this historic archaeological site, JBLM has requested that the pedestrian path be built on fill through the site, without cutting into the site, to further minimize effects. Given the condition of the site within the project area WSDOT’s commitment to construct the path on fill, we conclude that the site will not be adversely affected by the Build Alternative. A portion of site 45PI01316 is also located in the South Study Area, so potential effects to the site will be further assessed once a project footprint is established for the South Study Area.

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February 3, 2017  
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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.

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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.

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The Honorable JoDe Goudy  
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Sincerely,

Jeff Sawyer  
Environmental & Hydraulic Manager  
Olympic Region

JBS:pd:rk:ip  
Enclosures:  
*Joint-Base Lewis-McChord Vicinity I-5 Improvement Project Cultural Resources Assessment*, prepared by ATCRC, dated 19 January 2017 (cd)

*Draft Programmatic Agreement Regarding the Joint-Base Lewis-McChord Vicinity I-5 Improvement Project, Pierce County, Washington*

cc: Johnson Meninick, Yakama Nation Cultural Resources, w/cd  
Bill Elliott, WSDOT Olympic Region Plans Engineer  
Roger Kiers, WSDOT Cultural Resources  
Dennis Wardlaw, DAHP Transportation Archaeologist  
Dean Moberg, FHWA Area Engineer  
Project File