CULTURAL RESOURCES REPORT COVER SHEET

Author: Robert Kopperl

Title of Report: Archaeological and Historical Background Assessment for the Archer Hotel Development, Redmond, Washington

Date of Report: January 14, 2016

County(ies): King Section: 12 Township: 25 N Range: 5 E

Quad: Bellevue North (1983) Acres: ~1

PDF of report submitted (REQUIRED) ☒ Yes

Historic Property Inventory Forms to be Approved Online? ☐ Yes ☒ No

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

TCP(s) found? ☐ Yes ☒ No

Replace a draft? ☐ Yes ☒ No

Satisfy a DAHP Archaeological Excavation Permit requirement? ☐ Yes # ☒ No

Were Human Remains Found? ☐ Yes DAHP Case # ☒ No

DAHP Archaeological Site #:

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- Please be sure that any PDF submitted to DAHP has its cover sheet, figures, graphics, appendices, attachments, correspondence, etc., compiled into one single PDF file.
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TECHNICAL MEMORANDUM

Archaeological and Historical Background Assessment for the Archer Hotel Development
Redmond Washington

Robert Kopperl, Ph.D., R.P.A.

January 14, 2016

Introduction

LodgeWorks Partners, L.P. (LodgeWorks) proposes construction of the Archer Hotel, a seven story building on the current site of the Claim Jumper restaurant near the Redmond Town Center shopping complex in Redmond, Washington. ESM Consulting Engineers, LLC (ESM), working with LodgeWorks, contracted with Willamette Cultural Resources Associates Ltd. (WillametteCRA), to conduct a desktop review of background information pertinent to the project, and to produce this brief memorandum summarizing this information to support the project through the City of Redmond's Pre Review Entitlement Process (PREP).

This memorandum provides information regarding the project and its regulatory setting, the natural and cultural background of the project vicinity, and a review of previous cultural resources investigations and known archaeological and historical resources within one-half mile of the project. This is followed by a synthesis of existing geotechnical data generated specifically for this project and interpretations of archaeological sensitivity based on data generated from investigation nearby at the Bear Creek site (45KI839), and recommendations for additional investigation and management measures that may be required for compliance with the State Environmental Policy Act (SEPA) and the request by the City of Redmond.

Project Location and Description

The project site is on approximately one acre currently occupied by the now-closed Claim Jumper restaurant and adjacent parking lot, at 7210 164th Avenue NE, in the City of Redmond, King County, Washington (Figure 1). It is composed of two separate parcels on the northeast corner of the intersection of 164th Avenue NW and Bear Creek Parkway (Figure 2). The eastern half of the project area is occupied by the vacant Claim Jumper restaurant building (King County Parcel No.

Figure 1. Project location map.

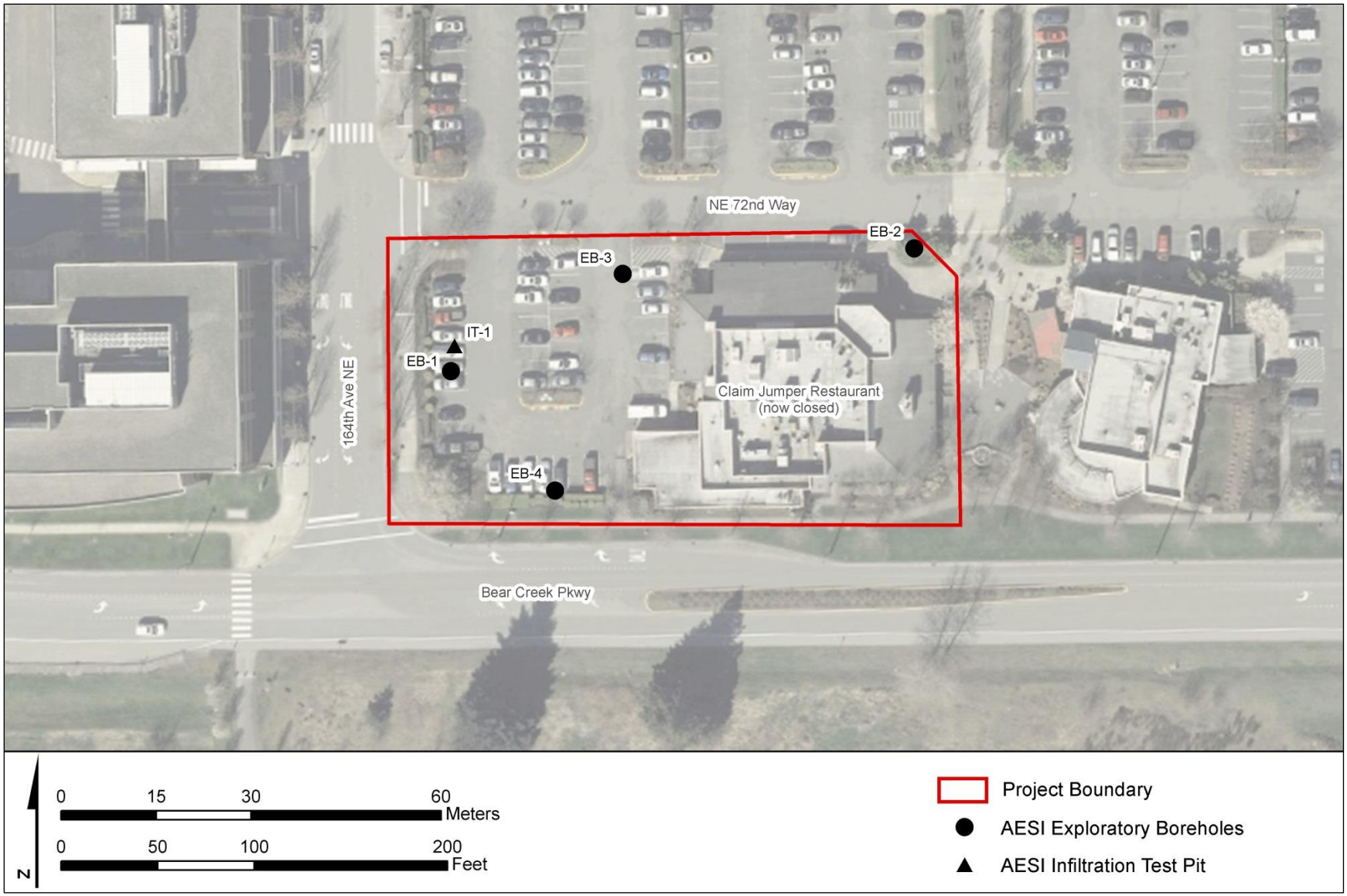

Figure 2. Project configuration map.

7202410040), constructed in 1998 according to the King County Assessor's Office. The western half is a paved parking lot interspersed with landscaped barriers, light-stands, and other features, and is part of the Redmond Town Center (King County Parcel No. 7202410030). The entire project area is either paved or occupied by the existing building and other features of the development. It is relatively level, and is situated across Bear Creek Parkway from the Lower Bear Creek habitat restoration area.

The project as proposed would consist of demolition of the existing structure and construction of a seven-story building that includes two stories for above-ground parking and another five for mixed use, including the hotel. Design specifications call for limiting subsurface ground disturbance where possible, and may include site-wide excavation up to 4 feet below the existing grade to place a spread footing foundation. Excavations anticipated to be deeper, based on WillametteCRA's understanding of the project, are limited to an indoor pool (anticipated depth 10 feet below existing grade) and base of the elevator shaft (anticipated depth 11 feet below existing grade).

Regulatory Setting

Preparation of this memo and its submittal with other PREP materials comes at the request of the City. The project is also subject to the provisions of SEPA and its implementing rules contained in the Washington Administrative Code [WAC 197-11], which require project proponents to identify any places or objects on or adjacent to the project that are listed in, or eligible for, national, state, or local preservation registers, and to identify sites of archaeological, scientific, or cultural importance on or adjacent to the project. In addition, the Archaeological Sites and Resources Act [RCW 27.53] prohibits knowingly excavating or disturbing prehistoric and historic archaeological sites on public or private land. The Indian Graves and Records Act [RCW 27.44] prohibits knowingly destroying native Indian graves and provides that inadvertent disturbance through construction or other activities requires re-interment under supervision of the appropriate Indian tribe.

Project Area Description and Background

Although the immediate vicinity of the project is characterized by modern development that has obscured many aspects of the natural environment that would have been more readily apparent prior to the mid-20th century, the nature of intact naturally deposited sediments that remain below fill within the project area and their stratigraphic relationships are highly informative of their potential to contain buried archaeological resources. In addition to the natural setting of the project, our knowledge of the pre-contact cultural history and more recent history of Native American and Euroamerican settlement of this area also contributes to an assessment of the potential for archaeological remains to be impacted by ground disturbance in a particular area.

Natural Setting

The modern landscape of western Washington is diverse, and characterized by landforms and sediments produced across multiple spatial and temporal scales in glacial, deglacial, and non-glacial environments – many of which are found in the vicinity of Redmond. Some of the physical features associated with earlier glacial and deglacial conditions are still readily visible in this modern landscape; other landscape features are the products of much more recent Holocene geomorphic processes.

The project area is near the confluence of the Sammamish River with Bear Creek, one of its major tributaries. The Sammamish River basin lies within the Salish Lowland which is part of a larger structural feature in the Pacific Northwest known as the Puget Trough (Haugerud 2004). The modern topography and surficial geology of the region has been affected by multiple glaciations that advanced southward from British Columbia into the lowland between the Olympic Mountains and the western flanks of the Cascade Range. The latest Pleistocene glacial maximum, known in the Seattle area as the Vashon Stade of the Fraser glaciation, began about 17,000 -18,000 years ago and ended abruptly with the onset of climatic warming about 13,000 years ago (Easterbrook 1993, 2003; Porter and Swanson 1998).

Deglaciation occurred rapidly, and was accompanied by a progressively complex succession of meltwater channels and ice-marginal lakes that developed during a period which probably encompassed less than 1,000 years (Waitt and Thorson 1983). The Lake Sammamish basin was part of the recessional lake system in the main basin of the Lowland, and lake levels during this time were much higher than the modern elevation of modern Lake Sammamish, since the lake levels at that time were controlled by higher elevation spillways (Booth 1990; Haugerud 2006; Shimel et al. 2003).

Dramatic, localized changes to landforms occurred during an earthquake on the Seattle Fault Zone, which is straddled by the Lake Sammamish Basin, around 1,100 years ago, which affected shoreline, riverine, and lacustrine habitats (Bucknam et al. 1992). The earthquake generated tsunamis and was accompanied by uplift south of the fault and subsidence to the north (Bucknam 1998; Logan and Walsh 1995; Troost and Stein 1995). Short-term effects included shifts in stream gradients, liquefaction, tsunamis that eroded bluffs and buried marine shorelines, seiches or lake tidal waves that eroded lakeshores, and mass wasting including landslides that dropped large blocks of sediment in Lake Washington and Lake Sammamish (Karlin and Abella 1992; Logan and Walsh 1995; Thorson 1998). Other effects from the earthquake include probable liquefaction features at the Marymoor archaeological site (45KI9) directly north of the Lake Sammamish outlet, possible lowering of the former Sammamish River floodplain now buried in places by four to six feet of diatomaceous flood- and slackwater deposits, and associated formation of extensive marshes and

oxbows on the floodplain, which were observed during the early historic period, indicative of a lowered channel gradient (Collins 2001; Hodges 2004; Lewarch et al. 2000).

Prior to channelization, the Sammamish River exhibited a large-amplitude, highly sinuous meander pattern and Bear Creek emptied into the river closer to Marymoor Park. The river was straightened and ditched early in the twentieth century by local drainage districts with federal, state, and county funding. The owner of Willowmoor Farm (now Marymoor Park) diverted Bear Creek in the early 1930s to its current straight alignment just south of Redmond Town Center. The lower 3,000 feet of Bear Creek were then dredged in 1965 by the U.S. Army Corps of Engineers (USACE) as part of the Sammamish River Channel Improvement Project. The maximum depth of dredging was 5 feet to a uniform gradient, and the channel bottom and sides were lined with riprap. The modifications to Bear Creek caused higher water velocities and removed fish refuge and habitat. The City pursued rehabilitation of lower Bear Creek in the vicinity of Redmond Town Center starting around 1990, when the concept appeared in the Bear Creek Basin Plan, jointly completed by the City and King County. In 1996 the City began to work with USACE to restore lower Bear Creek, and channel and habitat restoration were essentially completed by the end of 2014.

Cultural Setting

Little archaeological evidence has been found so far associated with Late Pleistocene and early Holocene human occupation of the Puget Lowlands, although recent investigation at the Bear Creek site (45KI839), 400 feet southwest of the project, has contributed a substantial amount of data from intact archaeological deposits dating between about 10,000 and 12,500 years ago (e.g., Kopperl et al. 2010, 2015). Aside from the Bear Creek site, knowledge of this period in the Puget Lowlands is limited to several isolated finds of artifacts diagnostic to this period but sparsely distributed across the region and lacking context. More common are Olcott sites, named after the type site in Snohomish County near Arlington and found mostly on glacial outwash surfaces in the Puget Lowland and inland foothill valleys (e.g., Kidd 1964). The distinctive Olcott stone tool assemblage consists of large, leaf-shaped and stemmed points and flake tools manufactured from locally available cobbles. These assemblages are usually interpreted as evidence of an early, highly mobile hunting and gathering adaptation. This pattern may have persisted for over 6,000 years and near its end is marked by increasing reliance on marine and riverine resources.

After about 5,000 years before present (BP), larger populations organized in more complex ways to utilize a wide range of locally available resources including large and small mammals, shellfish, fish, berries, roots, and bulbs, with an increasing emphasis on salmon over time. Shell middens containing large quantities of shellfish remains and marine fish and mammal bone are common on the saltwater shoreline. Groundstone, bone, antler, and shell tools became increasingly common and more diversified through time. Full-scale development of marine-oriented cultures on

the coast and inland hunting, gathering, and riverine fishing traditions as represented in the ethnographic record are apparent after about 2500 BP. Large semi-sedentary populations occupied cedar plank houses located at river mouths and confluences and on protected shorelines. Artifacts made of both local and imported materials occur, indicating complex and diversified technologies for fishing, hunting, food processing, and storage. Wealth-status objects, status differentiation in burials, art objects, and ornaments are also represented during this period (e.g., Ames and Maschner 1999).

The land between Lake Sammamish and Lake Washington and surrounding the Sammamish River is within the traditional territory of native Lushootseed-speaking people named *scababš*, loosely translated as "meander dwellers" (Smith 1940; Waterman 2001). Government officials in the nineteenth century anglicized the name of the people to Sammamish. Ethnographer T.T. Waterman recorded several place names in the project vicinity, including *TL'ᵊoqᵊ*, meaning "crowded, poked in", that encompasses much of present-day downtown Redmond including the project area, and is listed on the King County Historic Preservation Program ethnographic location database (KING #07357). *Tuba'hal* (or *xʷobàl*, Steven Mullen-Moses, personal communication, 2015), meaning "broad" for a creek, may refer to Bear Creek entering the Sammamish river below Redmond (KING #07358). *Ciqe'd* refers to the head of Sammamish River where it leaves the lake (KING #07359), and *Laputsid*, meaning "hard to find", refers to the outlet of Lake Sammamish into the Sammamish River where the marsh obscured the entrance to the river (KING #07360) (Waterman 2001).

Under terms of the Point Elliot Treaty of 1855, many Native American communities in this area were initially assigned to the Port Madison Reservation and others, including the Snoqualmie (*sdukʷalbixʷ*) people, to the Tulalip Reservation, but the people living in the vicinity of Lake Sammamish were not explicitly represented (Ruby and Brown 1992). After the Treaty Wars, the Muckleshoot Reservation was established for all of the people of the Duwamish River watershed. While some *scababš* moved to reservations, others moved to the logging community of Monohon on Lake Sammamish, continued to live in traditional locations until the early twentieth century, or filed claims under the Indian Homestead Act. Others became members of the Snoqualmie Indian Tribe, and along with the Snohomish, Skykomish, and other groups, became the Tulalip Tribes under the Indian Reorganization Act of 1934 (Lane 1975a, 1975b). The Snoqualmie Indian Tribe achieved separate federal recognition in 1999.

The Sammamish Valley began to be settled by Euroamericans in the 1860s, and by 1871 Warren Perrigo and Luke McRedmond had filed claims near the present-day Redmond. Shortly thereafter, in 1876, the Tosh brothers had settled in the Marymoor area. Much of the early economy in the Sammamish River basin concentrated on logging, but by the early twentieth century, the forests around Redmond were cleared, the wood products industry had declined, and agriculture became the dominant economic activity of the valley. The logged land, along with dredging and diking

operations, made the flood plain attractive to farmers, and as a result, a wide variety of farms were established specializing in a wide array of agricultural products such as pigs, milk products, poultry and eggs, berries, and grapes (Way 1989).

As early as 1910 local farmers were removing the meanders and straightening the channel of the Sammamish River into a drainage ditch in many places. Flooding continued to be a problem, so in 1911, the Sammamish River Drainage District was formed and dredged the river to improve its drainage capacity. Historical aerial photographs indicate the project vicinity was undeveloped during this time, and through at least the 1930s (King County GIS Center 2016). Flooding continued despite lower Bear Creek having been channelized by then, and it was not until 1963 to 1965 that the USACE completed the final straightening and dredging of the Sammamish River along the west side of downtown Redmond through Marymoor Park (Bryant 2000; Chin et al. 2003). The latter half of the twentieth century also saw development of the project area first as a golf course and then as part of the Redmond Town Center shopping mall.

Previous Cultural Resources Investigations

The vicinity of Redmond, Washington, has been relatively well-studied in terms of previous cultural resources investigations over the past 50 years. The oldest documented archaeological record in the Puget Lowland is found here, including the oldest lithic tool-bearing archaeological site within 400 feet of the project along Bear Creek, dated over 10,000 years old (e.g., Kopperl et al. 2010), as well as extensive Native American occupation at Marymoor Park during the middle-late Holocene (e.g., Greengo and Houston 1971).

A January 11, 2016, search of DAHP's online database, the Washington Information System for Architectural and Archaeological Records Data (WISAARD), indicated 19 reports associated with previous cultural resources investigations that were completed within a one-half mile radius of the project area since 1995 (Table 1).

A total of 6 resources have previously been recorded to DAHP Archaeological Site Inventory within about ½-mile of the project. None are located within the project area, although the Bear Creek site (45KI839) is in very close proximity. Information about these sites is given in Table 2.

Existing Geotechnical Data

The project area was the object of geotechnical studies prior to this archaeological resources review (Associated Earth Sciences 2015a and 2015b). Sediment samples were first retrieved during excavation of four boreholes (EB-1 to EB-4, see Figure 2) using a hollow-stem auger drill that retrieved samples at 2.5-foot to 5-foot intervals. Results indicate that a 2 to 4-foot thick layer of fill comprises the near-surface sediments across the project area. Sand, gravel, and cobbles interpreted

Table 1. Previous Cultural Resource Investigations Within Approx. ½-Mile of the Project Area.

Author	Date	Project and Type of Investigation	Relation to Project Area	Assoc. Resources Within ½ Mile
Boersema et al.	2014	Screening of Disturbed Archaeological Sediments at the Bear Creek Site 45KI839 – Post-Data Recovery Spoils Screening.	0.4 mile SSE	45KI839
CH2MHill	2006	SR 520/West Lake Sammamish Parkway to SR 202 – Desktop Review, Pedestrian and Shovel Probe Survey for NEPA EIS.	0.5 mile S	2 Lithic Isolates (noted, not recorded)
CH2MHill	2013	Redmond Way and Cleveland Street Couplet Conversion – Desktop and Geotechnical Borehole Review, Historic Building Survey.	0.4 mile N	Numerous Historic Buildings
Chambers and Montgomery	2012	Cultural Resources Assessment for the Redmond Central Connector Project, Phase 1 – Pedestrian and Limited Shovel Probe Survey, Historic Railroad Grade Documentation.	0.4 mile N	45KI451
Chobot and Harrison	2008	Marymoor Connector Trail Cultural Resource Testing Project – Desktop Review, Shovel Probe Survey.	0.3 mile SW	None
Earley	2005	Cultural Resources Assessment of the Bear Creek Trail Project.	0.5 mile E	None
Emerson and Gundy	1998	A 1998 Inventory of 165 Historic Properties Within the City of Redmond – Historic Property Survey.	Within	Numerous Historic Buildings
Hodges et al.	2009	Cultural Resource Assessment for the Lower Bear Creek Rehabilitation Project – Desktop Review and Archaeological/Geoarchaeological Survey.	0.4 mile SSE	45KI839
Kenmotsu	2014	Damage Assessment for the Bear Creek Site, 45KI839 – Archaeological Damage Assessment.	0.4 mile SSE	45KI839
Kopperl et al.	2010	Results of Testing at the Bear Creek, Site 45-KI-839 – Archaeological Test Excavation.	0.4 mile SSE	45KI839
Lewarch et al.	2000	Cultural Resource Assessment for Marymoor Park Baseball Field Rehabilitation.	0.3 mile SW	None
Nelson	2000	Heritage Resources Investigations for Marymoor Park Utility Trench.	0.5 mile S	45KI492
Norman	1999a	Letter to Craig Lewis RE: Archaeological Testing of Flood Plain Mitigation Area for Marymoor Parking Lot Expansion.	0.4 mile S	Lithic isolate (noted, not recorded)

Table 1. Prev. Cultural Resource Investigations Within Approx. ½-Mile of the Project Area (Cont.).

Author	Date	Project and Type of Investigation	Relation to Project Area	Assoc. Resources Within ½ Mile
Norman	1999b	Letter to John Gallagher RE: Archaeological Monitoring for Marymoor Park Telephone Cable Trenching.	0.4 mile S	None
Norman	2000a	Letter to Mark Crandell RE: Archaeological Testing for the Marymoor Park Riparian Enhancement Project – Shovel Probe Survey.	0.5 mile S	None
Norman	2000b	Letter to Bill Schwartz et al RE: Archaeological Monitoring of Marymoor Park Fiber Optic Trench.	0.4 mile S	None
Norman	2000c	Letter to Karl Kostal et al RE: Archaeological Testing for Clise Mansion Sprinkler System.	0.4 mile S	None
Roedel and Larson	2001	Letter to Robert Harding RE: Archaeological Monitoring of Marymoor Park Baseball Field Rehabilitation.	0.3 mile SW	None
Rooke and Goetz	2005	Cultural Resources Assessment for the Redmond Transit Center – Desktop Review and Historic Building Survey.	0.5 mile N	Redmond Public Library

Table 2. Previously Identified Archaeological Sites Within Approx. ½-Mile of the Project Area.

Site No.	Site Name	Site Type	Relation to Project Area	Significance
45KI8	Unnamed	Pre-contact Lithic Material	0.1 Mile SW	Not evaluated
45KI9	Marymoor Site	Pre-contact Lithic Material	0.5 Mile S	Listed on the NRHP
45KI10	Unnamed	Pre-contact Lithic Material	0.4 Mile S	Not evaluated
45KI451	Seattle Lake Shore & Eastern Railroad Grade	Historic Railroad Property	Adjacent to the North	Determined not eligible to NRHP
45KI492	Unnamed	Pre-contact Lithic Material	0.4 Mile S	Not evaluated
45KI839	Bear Creek Site	Pre-contact Lithic Material	~400 Feet SW	Determined eligible to the NRHP

as young (Holocene-epoch) alluvium was observed below fill down to the maximum extent of the boreholes, all four of which terminated at 21.5 feet below surface (fbs). Following the borehole excavation, a field infiltration study was conducted that involved excavating a test pit (IT-1) in the northwest portion of the project parcel near one of the geotechnical boreholes (EB-1) (Figure 2). The pit encountered an approximately 2-foot thick layer of fill above weathered and unweathered sand, gravel, and cobbles interpreted as the same Holocene-aged alluvium observed in the boreholes, to a depth of at least 7.5 feet, where the pit was terminated.

Nearby Archaeological and Geoarchaeological Data

During early phases of archaeological investigations in association with the lower Bear Creek rehabilitation project, the corridor of which comes within approximately 150 feet south of the hotel project area (Hodges et al. 2009; Kopperl et al. 2010; Kopperl et al. 2015), 42 geotechnical testpits and geoarchaeological backhoe trenches were excavated and examined in the lowermost reach of Bear Creek. The testpits and trenches in the westernmost portion of that project, adjacent to the modern Sammamish River, exposed laminated and interbedded layers of sand, organic silt and thin peats buried under six feet of silty diatomaceous earth. These, in turn, were resting on a west-dipping slope underlain by stratified gravel associated with glacial outwash and early postglacial stream channels. The depositional sequence above the gravels was interpreted to be Sammamish River alluvium and floodplain deposits buried by later Sammamish River diatom-rich slackwater deposits.

No archaeological materials were found in the Sammamish River alluvium in the western portion of the rehabilitation project, but just to the east and slightly topographically higher in elevation, corresponding with the Bear Creek archaeological site boundary, artifacts were found in a thin (often 10 cm thick or less) sandy stratum approximately 4-5 feet below the pre-construction ground surface, directly on top of gravels and buried by a well-expressed sequence of peats (collectively referred to as Stratum V during site investigations). In addition, sand, gravel, and cobbles filled buried remnants of what appears to be a braided channel that cut through a portion of the site area during the mid-Holocene, scouring away the peat and underlying intact archaeological deposits in some places (Stratum III). This channel appears to have flowed through the site from the north/northeast, possibly through the present-day project area. The Stratum III alluvium contained artifacts, but at much lower densities than those from the base of Stratum V, and lacking *in situ* spatial association and therefore a reliable age estimate. Underlying both the intact Stratum V archaeological deposits from Late Pleistocene-Holocene (LPH) and the Holocene-aged Stratum III alluvium are older glacial outwash sediments (Stratum VI).

Expectations

The project is considered, without additional subsurface investigation, to have a moderately high potential for buried pre-contact archaeological resources because of its natural setting in close proximity to Bear Creek and indications from geotechnical data of the presence of deposits underlying fill throughout the project area that are similar to the nearby Bear Creek site. Expectation for archaeological resources is somewhat tempered by previous ground-disturbing activities that included grading, paving, construction of the Claim Jumper restaurant, and installation of buried utilities. Although project geotechnical data showed no indication of the presence of buried peat that is the most notable characteristic of the LPH archaeological deposit across the Parkway at the Bear Creek site, the Holocene alluvium that is present below fill within the project may correspond with Stratum III at the Bear Creek site, which also contained artifacts albeit from redeposited contexts.

The project area has an extremely low potential for buried significant historic-period cultural resources, which, if present, would have been near the modern ground surface and likely removed during development in the mid- to late-twentieth century, first as a golf course and then as a shopping mall. No standing historic buildings or other structures will be impacted by the project.

Conclusions and Recommendations

This assessment includes both archival research and synthesis of geotechnical data from four on-site geotechnical boreholes and one infiltration test pit with geoarchaeological information about the nearby Bear Creek site. The geotechnical data indicate that the sediments below fill within the project limits are dominated by sand or interbedded sand and gravel layers with small amounts of silt scattered between 4-15 feet below surface – similar in appearance to the Stratum III sediments identified at the Bear Creek site. With greater depth, the sediments as described shift towards gravels more similar to the glacial outwash deposits of Stratum VI.

Using the analogous framework of archaeological stratigraphy from the Bear Creek site, buried sediments in the construction footprint of the project do not appear to include the same or similar LPH deposits that contained significant, in situ archaeological material at the Bear Creek site (as Stratum V). Sediments below fill are instead completely dominated by alluvium that appear from geotechnical description to be analogous to Stratum III of the Bear Creek site, which also contained artifacts but in secondary, redeposited contexts.

Given the inaccessibility of subsurface sediments prior to construction, and the potential for construction to impact native sub-fill deposits that may contain archaeological material, archaeological monitoring is recommended for all project-related ground disturbance deeper than approximately 2 feet below the present grade. Monitoring should be conducted under an agreed-upon monitoring and discovery plan (MDP) that provides procedures for monitoring to be followed

by construction personnel and archaeologists; protocols in the event of discovery of artifacts, intact archaeological deposits, and/or human remains; and a contact list of all appropriate personnel. Discovery of archaeological material during the course of monitoring usually requires a pause of excavation activities at the discovery location until consultation is made with DAHP and affected Tribes and a treatment plan is agreed upon. Proceeding would require securing an archaeological excavation permit from DAHP. DAHP permits can take 45 to 60 days to obtain. Therefore, WillametteCRA recommends submitting a pre-emptive DAHP permit application for project monitoring prior to the start of project-related ground disturbance to minimize construction delay in the event that isolated artifacts are found during monitoring – the most likely kind of discovery based on this assessment - although certain kinds of archaeological discoveries would likely entail a pause for additional consultation, such as intact archaeological deposits or human remains.

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