



Stride program

I-405 corridor

APPENDIX C

EJScreen Reports and Elementary School Attendance Areas



EJSCREEN Report (Version 2020)

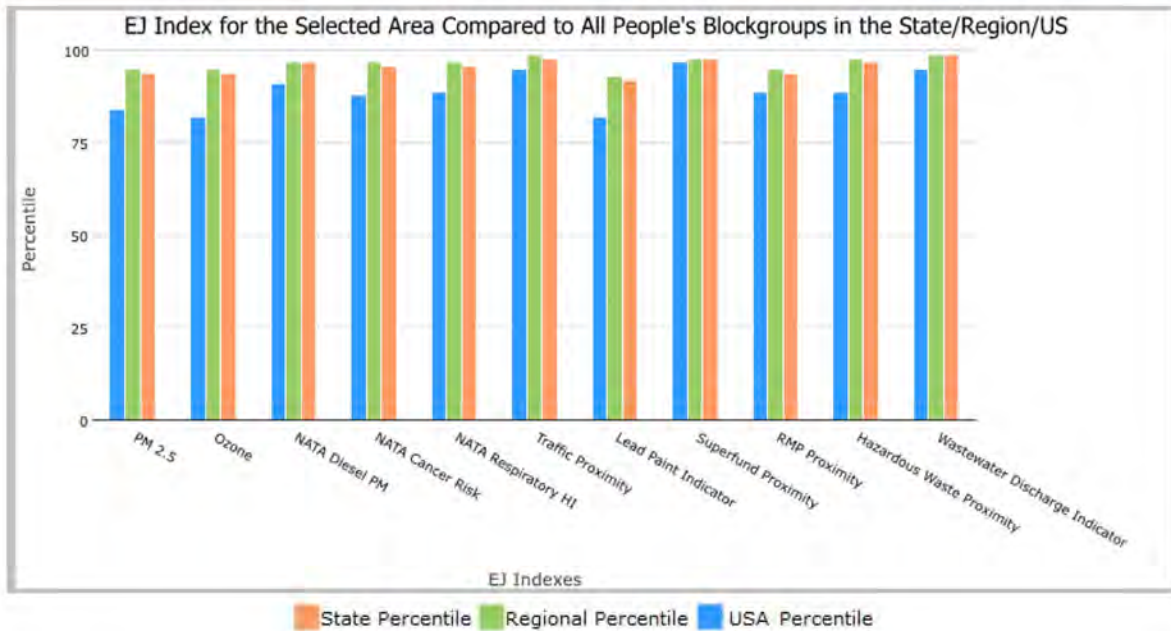


0.5 miles Ring around the Area, WASHINGTON, EPA Region 10

Approximate Population: 4,051

Input Area (sq. miles): 1.26

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	94	95	84
EJ Index for Ozone	94	95	82
EJ Index for NATA* Diesel PM	97	97	91
EJ Index for NATA* Air Toxics Cancer Risk	96	97	88
EJ Index for NATA* Respiratory Hazard Index	96	97	89
EJ Index for Traffic Proximity and Volume	98	99	95
EJ Index for Lead Paint Indicator	92	93	82
EJ Index for Superfund Proximity	98	98	97
EJ Index for RMP Proximity	94	95	89
EJ Index for Hazardous Waste Proximity	97	98	89
EJ Index for Wastewater Discharge Indicator	99	99	95



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

December 07, 2021

1/3



EJSCREEN Report (Version 2020)



0.5 miles Ring around the Area, WASHINGTON, EPA Region 10

Approximate Population: 4,051

Input Area (sq. miles): 1.26



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1



EJSCREEN Report (Version 2020)



0.5 miles Ring around the Area, WASHINGTON, EPA Region 10

Approximate Population: 4,051

Input Area (sq. miles): 1.26

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.12	8.21	66	8.52	47	8.55	34
Ozone (ppb)	36.3	37.3	51	39.1	35	42.9	14
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.878	0.585	78	0.481	80-90th	0.478	90-95th
NATA* Cancer Risk (lifetime risk per million)	41	34	88	31	90-95th	32	80-90th
NATA* Respiratory Hazard Index	0.62	0.5	86	0.46	90-95th	0.44	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	2900	610	96	510	97	750	94
Lead Paint Indicator (% Pre-1960 Housing)	0.2	0.23	60	0.22	60	0.28	52
Superfund Proximity (site count/km distance)	0.53	0.19	91	0.13	95	0.13	95
RMP Proximity (facility count/km distance)	1.1	0.63	82	0.65	81	0.74	79
Hazardous Waste Proximity (facility count/km distance)	4.2	1.9	86	1.5	90	5	81
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.047	0.0091	99	3.1	97	9.4	86
Demographic Indicators							
Demographic Index	59%	29%	93	29%	94	36%	81
People of Color Population	67%	31%	92	28%	94	39%	76
Low Income Population	51%	27%	87	30%	86	33%	80
Linguistically Isolated Population	6%	4%	77	3%	81	4%	75
Population With Less Than High School Education	10%	9%	67	9%	65	13%	53
Population Under 5 years of age	11%	6%	91	6%	91	6%	91
Population over 64 years of age	9%	15%	27	15%	25	15%	26

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

December 07, 2021

3/3



EJSCREEN ACS Summary Report



Location: User-specified polygonal location
 Ring (buffer): 0.5-miles radius
 Description:

Summary of ACS Estimates		2014 - 2018
Population		4,051
Population Density (per sq. mile)		3,628
People of Color Population		2,701
% People of Color Population		67%
Households		1,617
Housing Units		1,770
Housing Units Built Before 1950		266
Per Capita Income		32,277
Land Area (sq. miles) (Source: SF1)		1.12
% Land Area		92%
Water Area (sq. miles) (Source: SF1)		0.10
% Water Area		8%

	2014 - 2018 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	4,051	100%	845
Population Reporting One Race	3,633	90%	2,580
White	1,513	37%	404
Black	1,168	29%	657
American Indian	32	1%	154
Asian	421	10%	481
Pacific Islander	191	5%	525
Some Other Race	310	8%	359
Population Reporting Two or More Races	418	10%	367
Total Hispanic Population	553	14%	380
Total Non-Hispanic Population	3,499		
White Alone	1,351	33%	292
Black Alone	1,164	29%	657
American Indian Alone	32	1%	154
Non-Hispanic Asian Alone	383	9%	481
Pacific Islander Alone	189	5%	525
Other Race Alone	13	0%	51
Two or More Races Alone	368	9%	306
Population by Sex			
Male	1,994	49%	483
Female	2,057	51%	425
Population by Age			
Age 0-4	463	11%	181
Age 0-17	1,110	27%	347
Age 18+	2,942	73%	426
Age 65+	371	9%	132

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
 N/A means not available. Source: U.S. Census Bureau, American Community Survey (ACS) 2014 - 2018



EJSCREEN ACS Summary Report



Location: User-specified polygonal location
 Ring (buffer): 0.5-miles radius
 Description:

	2014 - 2018 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	2,507	100%	370
Less than 9th Grade	116	5%	82
9th - 12th Grade, No Diploma	135	5%	117
High School Graduate	768	31%	201
Some College, No Degree	920	37%	286
Associate Degree	272	11%	134
Bachelor's Degree or more	567	23%	191
Population Age 5+ Years by Ability to Speak English			
Total	3,589	100%	821
Speak only English	2,661	74%	487
Non-English at Home ¹⁺²⁺³⁺⁴	928	26%	612
¹ Speak English "very well"	504	14%	489
² Speak English "well"	298	8%	255
³ Speak English "not well"	126	4%	80
⁴ Speak English "not at all"	0	0%	12
³⁺⁴ Speak English "less than well"	126	4%	80
²⁺³⁺⁴ Speak English "less than very well"	424	12%	262
Linguistically Isolated Households*			
Total	100	100%	84
Speak Spanish	19	19%	63
Speak Other Indo-European Languages	8	8%	29
Speak Asian-Pacific Island Languages	61	61%	66
Speak Other Languages	12	12%	78
Households by Household Income			
Household Income Base	1,617	100%	197
< \$15,000	242	15%	148
\$15,000 - \$25,000	225	14%	138
\$25,000 - \$50,000	489	30%	175
\$50,000 - \$75,000	267	17%	140
\$75,000 +	393	24%	148
Occupied Housing Units by Tenure			
Total	1,617	100%	197
Owner Occupied	295	18%	101
Renter Occupied	1,322	82%	198
Employed Population Age 16+ Years			
Total	3,051	100%	652
In Labor Force	1,977	65%	482
Civilian Unemployed in Labor Force	112	4%	143
Not In Labor Force	1,074	35%	320

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of anyrace.

N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS)

*Households in which no one 14 and over speaks English "very well" or speaks English only.



EJSCREEN ACS Summary Report



Location: User-specified polygonal location
 Ring (buffer): 0.5-miles radius
 Description:

	2014 - 2018 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	3,105	100%	547
English	2,116	68%	443
Spanish	173	6%	297
French	0	0%	103
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	4	0%	18
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	121	4%	165
Chinese	110	4%	217
Japanese	N/A	N/A	N/A
Korean	15	0%	40
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	144	5%	194
Other Asian	219	7%	211
Tagalog	102	3%	123
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	3	0%	17
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	76	2%	130
Total Non-English	989	32%	704

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
 N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2014 - 2018.
 *Population by Language Spoken at Home is available at the census tract summary level and up.

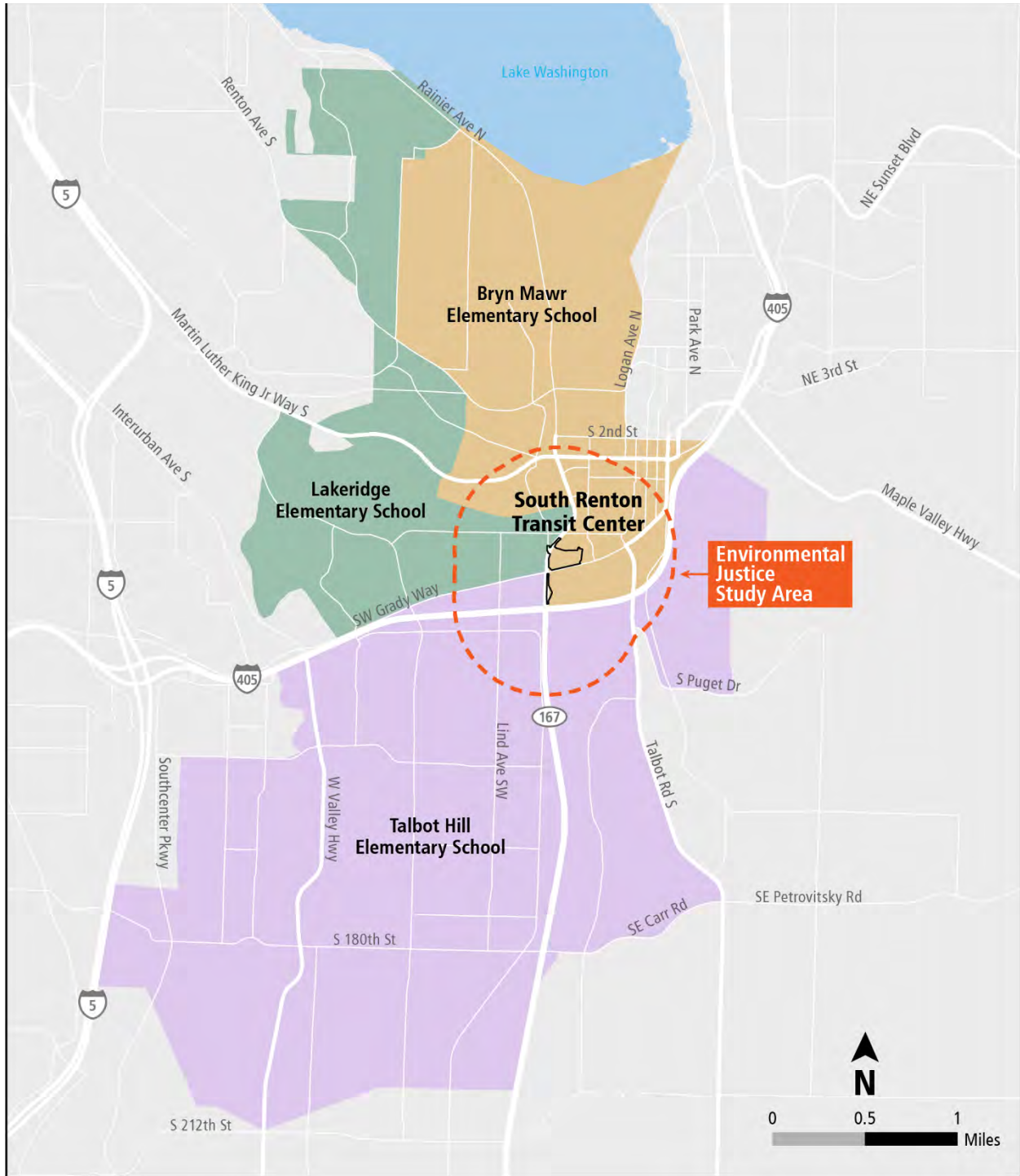


Figure C-1 Environmental justice study area and elementary school attendance areas

soundtransit.org

brt@soundtransit.org
206-398-5470



 **SOUNDTRANSIT** / *Powering progress*

Attachment C
South Renton Transit Center
Cultural Resources Report
(Including Section 106 Consultation)

CULTURAL RESOURCES REPORT COVER SHEET

DAHP Project Number: 2022-03-01259

Author: Chris Lockwood Ph.D. and Chanda R. Schneider

Title of Report: South Renton Transit Center and Roadway Improvements Project, King County, Washington – Cultural Resources Assessment and Inadvertent Discovery Plan

Date of Report: April 18, 2022

County(ies): King Section: 19 Township: 23N Range: 05 E

Quad: Renton, WA 7.5' Acres: ~24

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 #:

Final

SOUTH RENTON TRANSIT CENTER AND ROADWAY IMPROVEMENTS PROJECT, RENTON, KING COUNTY, WASHINGTON

Cultural Resources Assessment and Inadvertent Discovery Plan

Prepared for

Sound Transit

April 2022



Final

SOUTH RENTON TRANSIT CENTER AND ROADWAY IMPROVEMENTS PROJECT, KING COUNTY, WASHINGTON

Cultural Resources Assessment and Inadvertent Discovery Plan

Submitted to
WSP

Prepared for
Sound Transit

Prepared by
Chris Lockwood Ph.D. and Chanda R. Schneider

This report is exempt from public distribution and disclosure
(RCW 42.56.300)

ESA Project Number 201600948.00

5309 Shilshole Avenue, NW
Suite 200
Seattle, WA 98107
206.789.9658
www.esassoc.com



ABSTRACT

Environmental Science Associates (ESA) was retained by WSP, on behalf of the Central Puget Sound Regional Transit Authority (Sound Transit), to conduct a Cultural Resources Assessment for the South Renton Transit Center and Roadway Improvements project (Project).

Sound Transit, in conjunction with the Federal Transit Administration (FTA) is proposing to construct a new transit facility in South Renton for both bus rapid transit (BRT) and other bus transit service with roadway access improvements. Sound Transit has been awarded funding from the FTA, the lead federal agency for the project. In addition, the roadway improvements include work and modifications within the limited access right-of-way for I-405 on the National Highway System that will require approval by the Federal Highway Administration. The project will therefore be a federal undertaking, subject to compliance with Section 106 of the National Historic Preservation Act (36 CFR 800.3).

This cultural resource assessment includes a literature review, results of a pedestrian survey conducted in December of 2019, and results of ge archaeological borings conducted in July 2021. For this Project, ESA identified and recorded three historic-aged built environment resources that would be directly or indirectly affected by Project construction. These resources were reviewed by the Washington State Department of Archaeology and Historic Preservation (DAHP) State Historic Preservation Officer (SHPO) under the Washington State Environmental Policy Act (SEPA) in July 2021 and determined not eligible for listing in the National Register of Historic Places (NRHP). Additionally, no archaeological resources were identified during the pedestrian survey and ge archaeological borings conducted for the Project.

As a result of background research, consultation and coordination, and cultural resources fieldwork, ESA recommends a determination of No Historic Properties Affected within the Project's Area of Potential Effect (36 CFR 800.4(d)(1)). ESA recommends that an Archaeological Resources Inadvertent Discovery Plan (IDP) be put in place for the Project during construction (Appendix C). The IDP specifies that a preconstruction cultural resources orientation will be conducted with the contractor.

TABLE OF CONTENTS

South Renton Transit Center and Roadway Improvements Project

	<u>Page</u>
Abstract	i
1. Introduction	1
1.1 Project Description	1
1.2 Cultural Resources Assessment Conducted	3
1.3 Regulatory Environment.....	4
1.4 Area of Potential Effects.....	4
2. Project Setting	7
2.1 Archival Research Methods	7
2.2 Environmental Setting	7
2.3 Precontact Setting.....	13
2.4 Ethnographic Setting.....	14
2.5 Historical Setting	15
2.6 Existing Cultural Resources	21
2.7 Expectations.....	26
3. Archaeological Assessment	28
3.1 Pedestrian Survey.....	28
3.2 Geoarchaeological Borings.....	28
4. Summary and Recommendations	34
4.1 Evaluation Criteria	34
4.2 Recommendations	35
5. References Cited	36

Appendices

- Appendix A **Regulatory Correspondence**
- Appendix B **Geoarchaeological Boring Data**
- Appendix C **Inadvertent Discovery Plan**
- Appendix D **Historic Property Inventory**

List of Figures

Figure 1 South Renton Transit Center and Roadway Improvements Project Area of Potential Effects and Area of Potential Ground Disturbance.....	5
Figure 2 South Renton Transit Center and Roadway Improvements Project Area of Potential Effects and Area of Potential Ground Disturbance with Acquired Parcels.....	6
Figure 3 1897 USGS topographic map of South Renton Transit Center and Roadway Improvements Project	8
Figure 4 Changes of courses and nomenclature of rivers in the Duwamish Valley, 1899-1959	9
Figure 5 Geological Map of South Renton Transit Center and Roadway Improvements Project	10
Figure 6 1937 aerial photograph showing former stream channel and meanders	11
Figure 7 Soils Map of South Renton Transit Center and Roadway Improvements Project.....	12
Figure 8 1937 aerial photograph of South Renton Transit Center and Roadway Improvements Project	18
Figure 9 Map showing proposed clearing and ditching of Old Black River Channel to improve drainage and sanitary conditions, ca. 1935-1941	19
Figure 10 1954 aerial photograph of South Renton Transit Center Project.....	20
Figure 11 Aerial view of South Renton Transit Center and Roadway Improvements Built Environment Resources.....	25
Figure 12 Overview of western portion of planned South Renton Transit Center; view to north.....	29
Figure 13 Overview of southern end of the planned South Renton Transit Center; view to east.....	29
Figure 14 Locations of Geotechnical and Geoarchaeological Bores for the South Renton Transit Center and Roadway Improvements Project.....	30
Figure 15 Stratigraphic Cross-section (north to south). Dotted line is top of channel gravel.....	32
Figure 16 Stratigraphic Cross-section (west to east). Dotted line is top of channel gravel.....	33

List of Tables

Table 1 Precontact Periods.....	13
Table 2 Recorded Ethnographic Place Names within 0.25 Mile of the Area of Potential Effects.....	15
Table 3 Cultural Resource Assessments within 0.25 Mile of the Area of Potential Effects	21
Table 4 Recorded Archaeological Sites within 0.25 Mile of the Area of Potential Effects	22
Table 5 Built Environment Resources within the Area of Potential Effects.....	23

1. INTRODUCTION

Environmental Science Associates (ESA) was retained by WSP to conduct a Cultural Resources Assessment for Sound Transit's South Renton Transit Center (SRTC) and Roadway Improvements Project in King County, Washington. The Project is located in Renton, Washington, in Section 19 of Township 23 North, Range 05 East, Willamette Meridian on the Renton, Washington 7.5' series topographic map (Figure 1). The Project's area of potential ground disturbance includes King County parcels 1923059035, 1923059063, 1923059068, 1923059074 and portions of the road right-of-way along Rainier Avenue South between SW 7th Street and I-405, and at Hardie Avenue Southwest.

1.1 Project Description

The SRTC would be located on the north side of I-405, in the northwest corner of the intersection of South Grady Way and Rainier Avenue South (State Route 167). This new transit facility would be developed on the 8.3-acre site comprised of the four King County parcels (Figure 2). Work outside of the SRTC site would be limited to the existing road right-of-way as described below. In 2021, Sound Transit will complete the demolition of the buildings located on the four Project parcels. Sound Transit anticipates that construction of the transit center facilities will be complete in 2026 and the park-and-ride garage by 2034.

Facilities at the SRTC would include the following:

- Two new transit center islands and a bus loop area along the northern portion of the site, extending from Rainier Avenue S to the west to Lake Avenue S to the east. The smaller transit center island in the northwest portion of the site would have one bus bay (Bus Bay 1) and, just to the east, one larger island with seven 120-foot active bus bays (Bus Bays 2 through 8), for a total of eight active bus bays. I-405 BRT buses would use Bus Bay 1 on the smaller island and Bus Bay 8 (the southwest bay on the larger island). The remaining six active bays would provide space for other bus transit service operated by King County Metro. The two bays used by the I-405 BRT buses would have 9-inch raised platforms for near-level passenger boarding; at the other bays the transit center island height would be 6-inches. At Bus Bay 1 the I-405 BRT station on the transit center island would include a branded Stride shelter. On the larger transit island, the entire island would be covered by a single, large shelter. At both bus bays, the I-405 BRT station elements would also include a Stride branded pylon along with ticket vending machines and validators, security cameras, public address speakers, and real-time bus information signs. The pylon would be internally illuminated to be identifiable in the evening and during hours of less light.
- South of the transit center islands and bus loop area, 13 bus layover bays would be provided in the center of the site.
- Along Rainier Avenue S, and just south of the bus loop area, would be a 700-stall, 5-floor park-and-ride garage with drop-off and pick-up stalls on the first floor. Access to the park-and-ride garage would be from a separate right-turn-only entrance and exit from Rainier Avenue S, located south of the access to the transit center bus loop. Additional access to the park-and-ride garage would include a right-in/right-out driveway off of S. Grady Way (between Rainier Avenue S and Lake

Avenue S) and a driveway from Lake Avenue S; this access would not be restricted to right-in/right-out turns.

- Pedestrian access to the transit center site would be from the existing and reconstructed sidewalks along Rainier Avenue S and S Grady Way. A new sidewalk would be constructed along the eastern side of the transit center, along the frontage of Lake Avenue S. Pedestrian walkways would also be constructed within the transit center site along the north side of the bus loop, from Rainier Avenue S and Lake Avenue S, and along the west and north sides of the park-and-ride garage. The east side of the park-and-ride garage would not have public pedestrian access; access would be limited to bus operators and maintenance rooms. Crosswalks would be provided between the walkways to the transit center islands.
- Bicycle lockers and bicycle racks would be provided adjacent to the park-and-ride garage and Rainier Avenue S and on the east end of the larger transit center island.

To access the South Renton Transit Center from I-405, BRT vehicles heading in a westerly direction (southbound) on I-405 would use the exit onto Rainier Avenue S into an existing northbound, curbside business access and transit (BAT) lane. BRT buses would stay in the existing BAT lane across S Grady Way along Rainier Avenue S. BRT vehicles heading in an easterly direction (northbound) on I-405 would access the South Renton Transit Center using the existing exit onto Rainier Avenue S. To improve transit speed and reliability, northbound BRT vehicles would use a new short section of a bus-only, bus-on-shoulder lane on northbound Rainier Avenue S. that would be constructed starting at the existing southbound I-405 loop ramp and extending north approximately 200 feet north to connect with the existing BAT lane.

Once across S Grady Way, BRT vehicles heading northbound would turn right into the transit center's bus loop from a new signalized intersection at Rainier Avenue S and Hardie Avenue SW. This new intersection would also be the exit point for buses leaving the transit center and would be the primary ingress and egress location for the buses. Within this intersection, the existing raised, landscaped median in Rainier Avenue S would be removed to allow for turning movements, and crosswalks would be provided at each of the four roadway crossings. North of this intersection, the existing center median within Rainier Avenue S would be removed for a new southbound bus-only left-turn pocket that would allow buses to turn left into the transit center; a small section of a center median may remain at the southern end of the bus-only left-turn pocket. At the connection to Rainier Avenue S, Hardie Avenue SW would be reconstructed to realign the southbound lane adjacent to the northbound lane. This shift would require removing the northern portion of an existing raised, landscaped island. In place of the existing southbound lane on Hardie Avenue SW, a landscaped curb would be constructed, connecting with the remaining portion of the existing island. The new signal for this intersection will be included in this revised landscaped curb. For general-purpose traffic, the southbound lane on Hardie Avenue SW would be right-turn only. Buses on Hardie Avenue SW would be able to travel through the intersection into the transit center.

A secondary bus access into the transit center's bus loop would be from the east side of the site from Lake Avenue S. This secondary access would also provide connectivity to the bus bays and layover spaces at the existing South Renton Park-and-Ride located just east of the South Renton Transit Center. Access from Lake Avenue S provides bus circulation and access from S Grady Way, Shattuck Avenue S, and S

7th Street. Parking for operation and maintenance vehicles would be located in a pull off area that extends slightly south along the driveway that connects the park-and-ride garage to Lake Avenue S.

In the southern portion (adjacent to S Grady Way) and the eastern portion of the site (adjacent to Lake Avenue S) there is an existing Seattle City Light power line easement. Along the south boundary, the easement is approximately 100 feet wide. In the eastern portion of the site the easement is approximately 200 feet wide. Prior to the start of construction, Sound Transit would coordinate with the Seattle City Light, and utility providers as needed, to ensure construction activities would not interfere with their facilities and service. Once constructed, the transit facilities would not alter, affect, or interfere with this existing 240 kilovolt transmission line across the site. The easement area under the transmission lines would primarily be green space (where existing pavement would be removed) or would consist of ground-level improvements, such as the driveway to the park-and-ride garage off of Lake Avenue S and S Grady Way and the eastern portion of the transit loop. In addition, the existing sculpture located at the northeast corner of the intersection of Rainier Avenue S and S Grady Way, adjacent to the southwest corner of the transit center site, would remain.

BRT vehicles leaving the South Renton Transit Center would turn left onto Rainier Avenue S into an existing, southbound curbside BAT lane and then onto either northbound or southbound I-405 using existing on-ramps. Signal-timing improvements would be made, including adding traffic signal priority to the traffic signal at the intersection of S Grady Way and southbound Rainier Avenue S and at Rainier Avenue S and SW 7th Street.

For construction of the South Renton Transit Center, the contractor would likely stage the necessary equipment and materials on the site. For construction of the bus-only bus-on-shoulder lane along Rainier Avenue S, the contractor may stage equipment and materials in the area to the east of Rainier Avenue S, within the existing, unpaved right-of-way for I-405. The site would be cleared and graded as needed for the proposed transit center features and to provide adequate drainage. During construction, pile driving may be required to construct the foundation of the park-and-ride garage.

1.2 Cultural Resources Assessment Conducted

The cultural resources assessment for the Project has been conducted in a multi-phased effort consistent with the planning, preliminary design, and site work. In 2017, ESA conducted a preliminary evaluation of historic-aged built environment resources on the SRTC site to support planning for the I-405 BRT Project. This was followed by documentation of existing cultural resources within and adjacent to the project's area of potential ground disturbance to support Sound Transit's State Environmental Policy Act (SEPA) determination for the I-405 BRT Project. This effort included identifying and recording historic-aged built environment resources.

In July 2021, cultural resources work included development of an *Archaeological Geoprobe Work Plan* (Lockwood 2021), and monitoring geotechnical borings in coordination with FTA. Also, in July 2021, a SEPA-level report was provided for the area of potential ground disturbance in advance of building demolition within the SRTC Project parcels to occur in 2021. This document included evaluating three of the historic-aged built environment resources and submitting documentation to the DAHP State Historic Preservation Officer (SHPO) for review and concurrence with the findings.

This cultural resource assessment provides the Section 106 compliance for the Project and includes the results of archaeological geoprobes completed within the area of potential ground disturbance.

1.3 Regulatory Environment

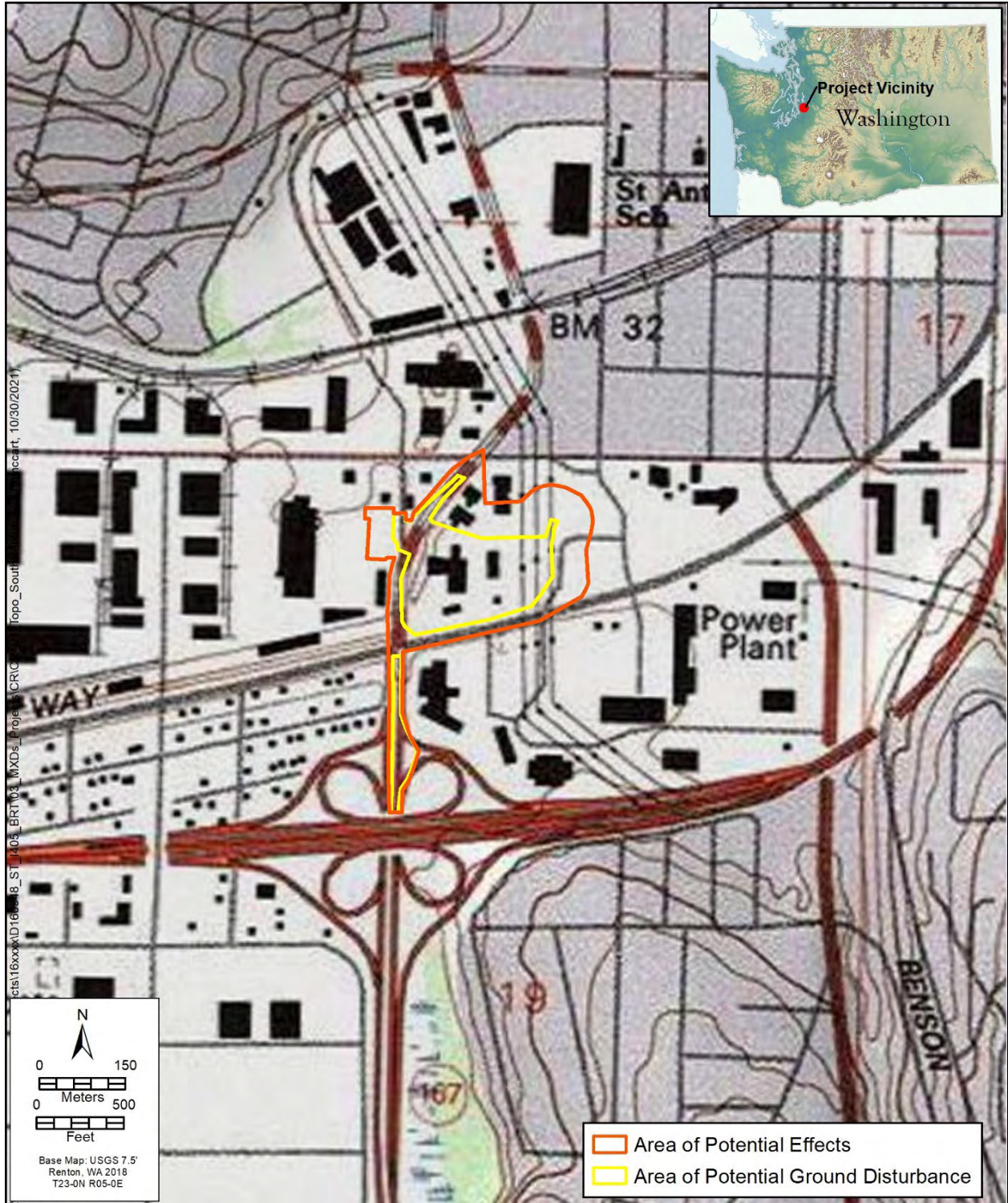
FTA is providing funding for the Project, which has been defined as a federal undertaking. Therefore, the Project is subject to Section 106 of the National Historic Preservation Act (NHPA) (36 Code of Federal Regulations [CFR] 800, as amended). In addition, work within the I-405 limited access right-of-way would require federal approvals and permits from the Federal Highway Administration. Section 106 requires that the lead federal agency consider the effects of this undertaking upon historic properties within the Project's Area of Potential Effects (APE). FTA defined the Project's APE in coordination with DAHP, Muckleshoot Indian Tribe, Samish Indian Nation, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Squaxin Island Tribe, Suquamish Tribe, Tulalip Tribes, and Confederated Tribes and Bands of the Yakama Nation (Appendix A).

This report documents efforts to identify and evaluate potential historic properties in the APE, and to evaluate whether the Project will affect historic properties, as required by 36 CFR Part 800. Additional laws that apply to archaeological projects conducted within the State of Washington include: Archaeological Sites and Resources (RCW 27.53), Indian Graves and Records (RCW 27.44), Human Remains (RCW 68.50), and Abandoned and Historic Cemeteries and Historic Graves (RCW 68.60).

1.4 Area of Potential Effects

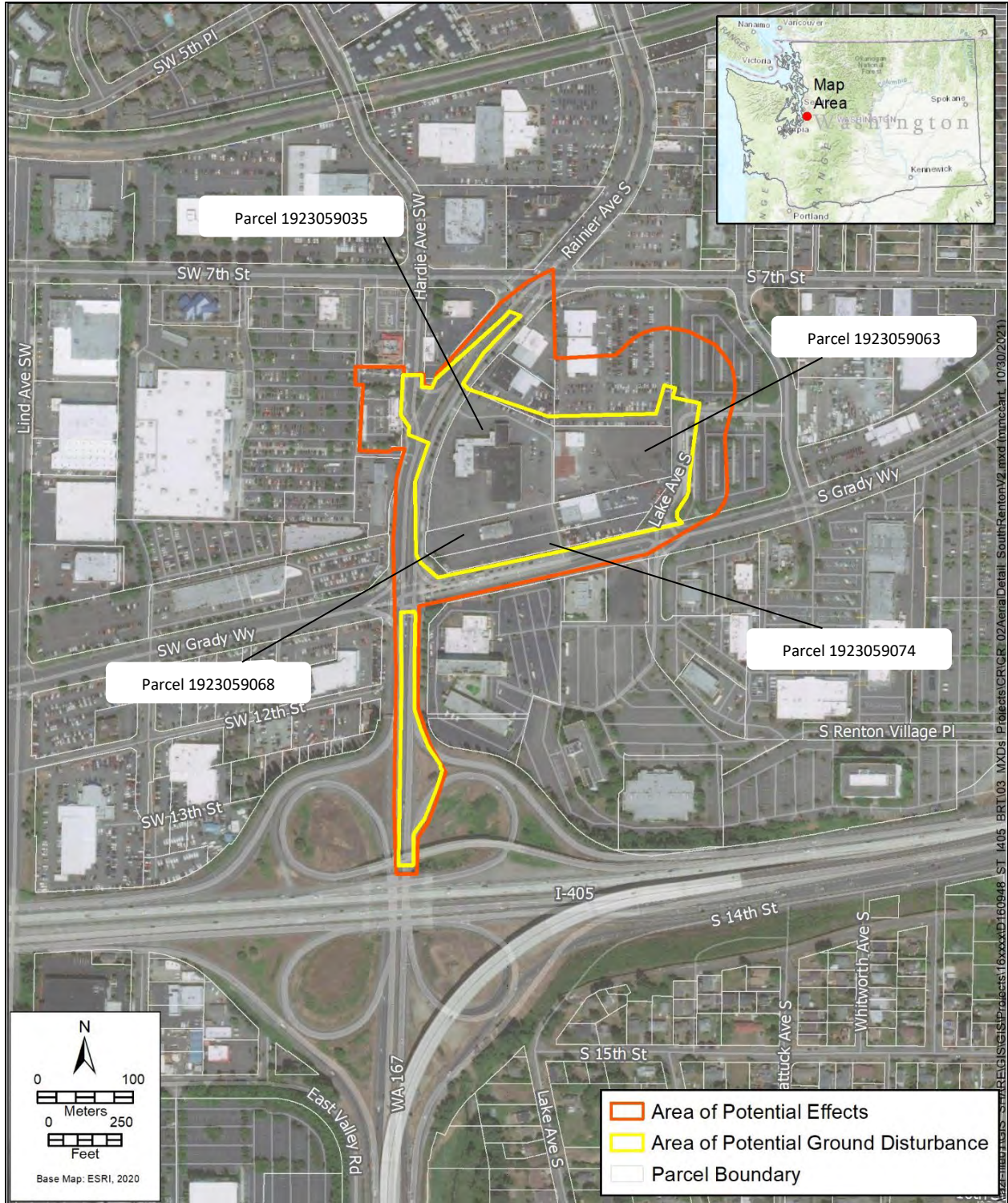
The APE for Project improvements includes the four parcels that Sound Transit has acquired for the new transit center, the extent of the roadway improvements within the City of Renton, plus a 200-foot buffer that includes an adjacent parcel and its buildings within 200 feet of the area of potential ground disturbance, and/or road right-of way depending on construction activities associated with ground disturbance. To determine the APE, the height, extent, and visibility of Project elements were taken into consideration (Figure 1 and Figure 2). Consistent with 36 CFR Part 800.16(d), the APE represents the area within which the undertaking may "directly or indirectly cause alterations in the character or use of historic properties, if such properties exist."

Anticipated elements resulting in ground disturbance would include the transit center island, bus bays, park-and-ride garage, utility relocation for station amenities, revised traffic signals, road and sidewalk revisions, improved pedestrian and bicycle access, and associated utility activity. Currently, it is anticipated that temporary construction staging for the transit center facilities would occur within the four parcels that have been acquired. Construction staging may include temporary ground disturbance such as vibration from moving equipment. For construction of the bus-only bus-on-shoulder lane along Rainier Avenue S, the contractor may stage equipment and materials in the area to the east of Rainier Avenue S within the existing, unpaved right-of-way for I-405. The project is still in the design phase. The potential maximum depth of ground disturbance is estimated to be up to 20 feet for new traffic signals, and 6 to 8 feet for utility trenching. Excavation for the park-and-ride garage foundation is expected to be up to 10 feet; however, if pilings are required for the park-and-ride garage foundation, the depth of disturbance for the pilings is estimated to be 50 to 80 feet. Ground-disturbing activities will be within existing road rights-of-way and the parcels acquired by Sound Transit, which have already been disturbed by previous development.



BASEMAP: USGS 2018

Figure 1
South Renton Transit Center and Roadway Improvements Project
Area of Potential Effects and Area of Potential Ground Disturbance



BASEMAP: ESRI 2020

Figure 2
South Renton Transit Center and Roadway Improvements
Project Area of Potential Effects and Area of Potential Ground Disturbance
with Acquired Parcels

2. PROJECT SETTING

2.1 Archival Research Methods

ESA conducted a literature review to the extent possible given repository closures/reduced availability due to government health and safety orders during the COVID-19 pandemic.

The literature review examined the Project's Study Area. The Study Area for this Project is defined as a 0.25-mile radius from the APE. In some cases, archaeological sites beyond the 0.25-mile Study Area are discussed where relevant.

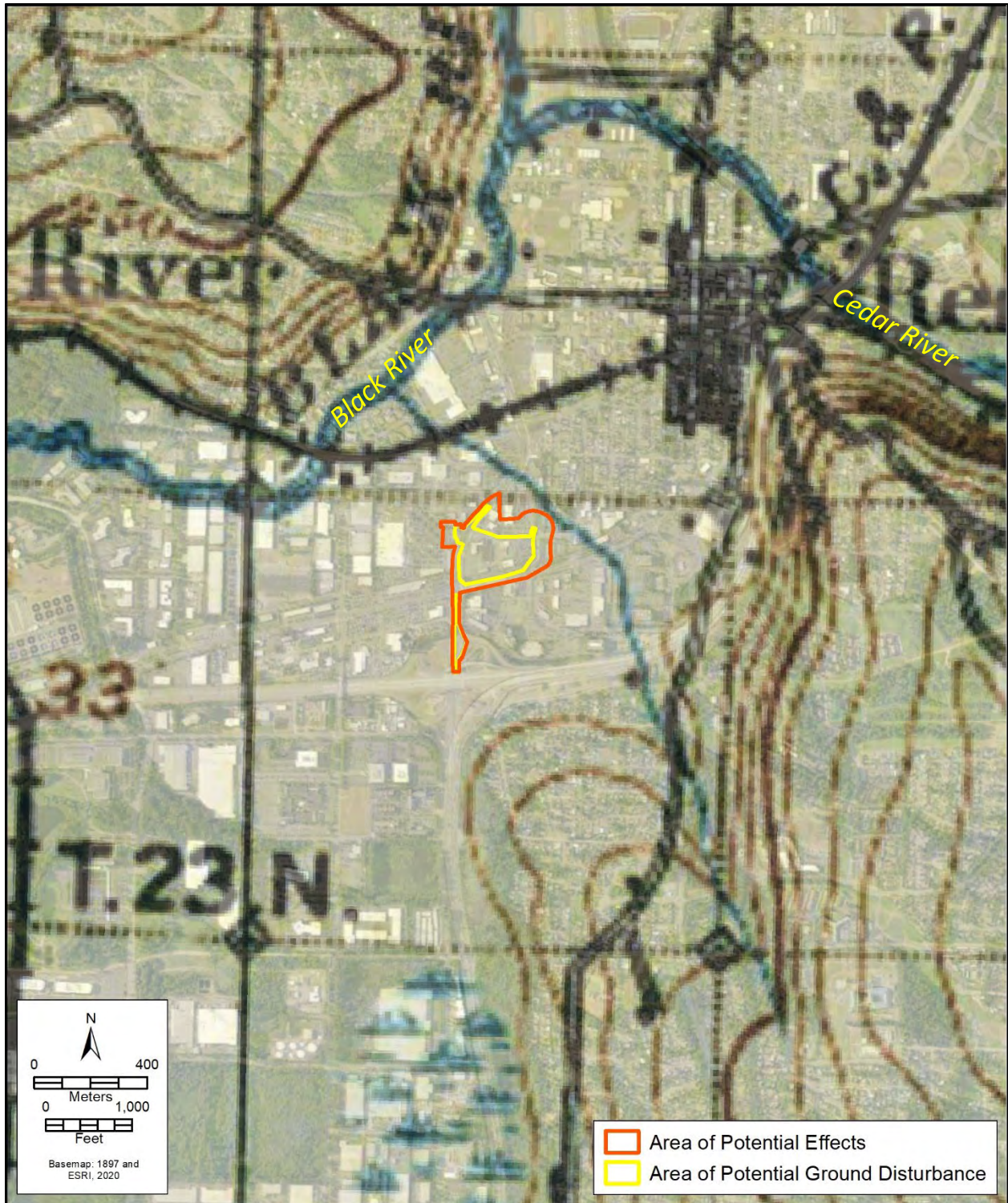
The literature review examined archaeological survey reports, recorded cultural resources, historic register-listed properties, ethnographic studies, historical maps, government landowner records, aerial photographs, regional histories, geological maps, soils surveys, and environmental reports. These information sources were reviewed to identify cultural resources (including archaeological sites, historic properties, cemeteries, and Traditional Cultural Properties) within the APE and the probability for unrecorded resources. Research included review of the Washington Information System for Architectural and Archaeological Records Data (WISAARD) system maintained by the Washington State DAHP, digital collections of the U.S. Bureau of Land Management, Washington State Archives, University of Washington Libraries, King County Assessor, King County Landmarks, King County Roads, other online resources and resources within ESA's research library.

2.2 Environmental Setting

2.2.1 Geology and Geomorphology

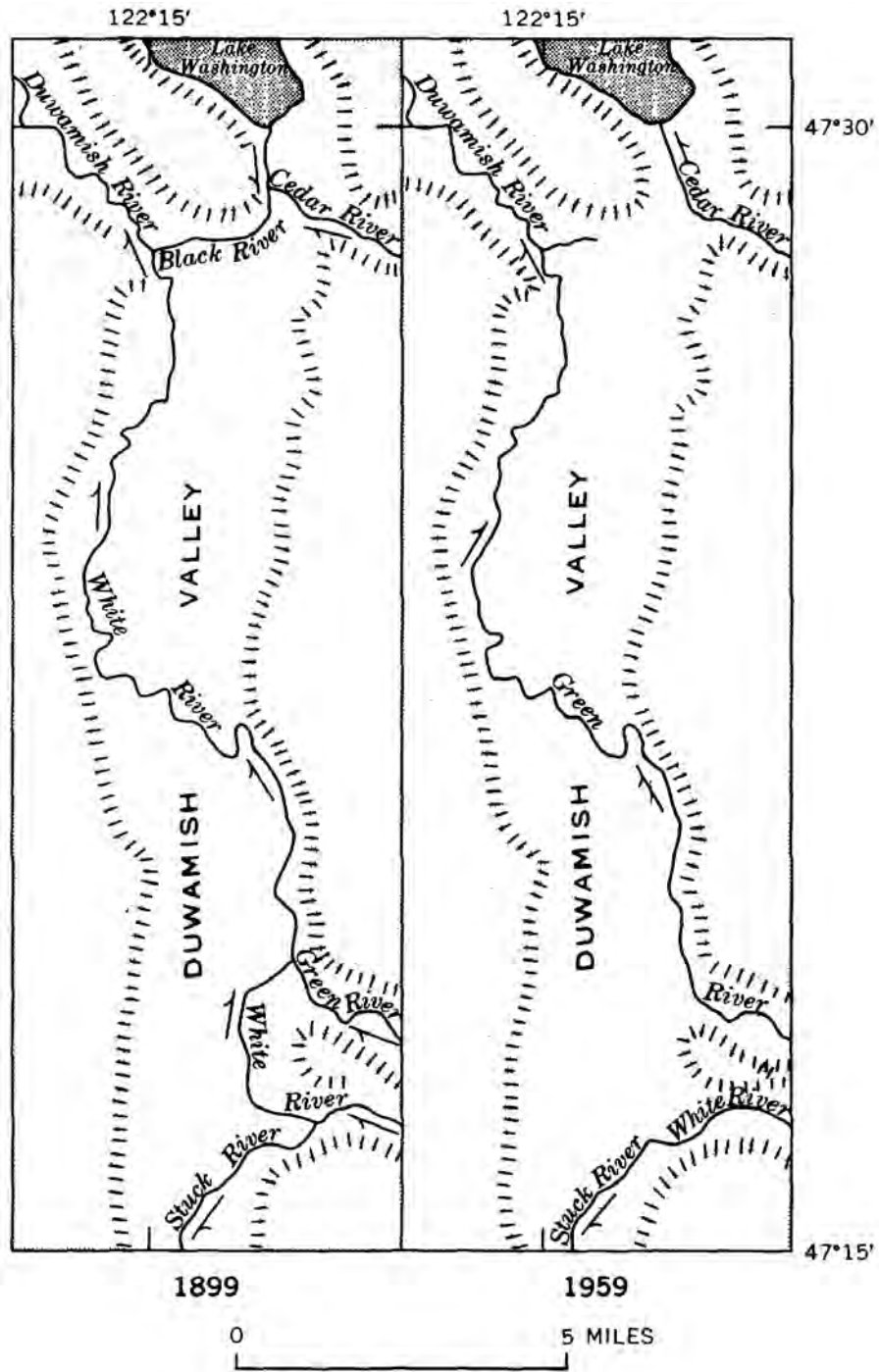
The APE is on the historic, pre-1916 floodplain of the Black River (Figure 3). Before 1916, Lake Washington drained into the Black River, which flowed westward to the White (now Green) River (Figure 4), while the Cedar River flowed just south of its current position and was a tributary to the Black River (Mullineaux 1970; Palmer 1992). After the Lake Washington Ship Canal was completed in 1916, the lake level dropped approximately 9 feet within a month, and the outlet to the Black River was blocked (Chrzastowski 1983). Later, the Cedar River was channelized and redirected from the Black River into Lake Washington (Mullineaux 1970; Palmer 1992). Deprived of water from both Lake Washington and the Cedar River, the Black River effectively ceased to flow.

Geological mapping indicates the APE is underlain by Holocene-aged alluvial sediments (Figure 5). The APE is situated approximately 0.20 miles southeast of the historic course of the Black River (Figure 3). Given its distance from the historic channel, the APE would be expected to contain significant quantities of fine-grained alluvium (fine sand, silt, and clay) deposited as a result of overbank flooding from the Black River. However, review of a 1936 King County aerial photograph reveals several channel meander scrolls immediately west and southwest of the APE, as well as a north-south oriented stream channel crossing the western margin of the APE (Figure 6), which suggests the APE also has a potential to contain coarse-grained alluvium (coarse sand, gravel, and cobble) associated with in-channel or bedload deposition.



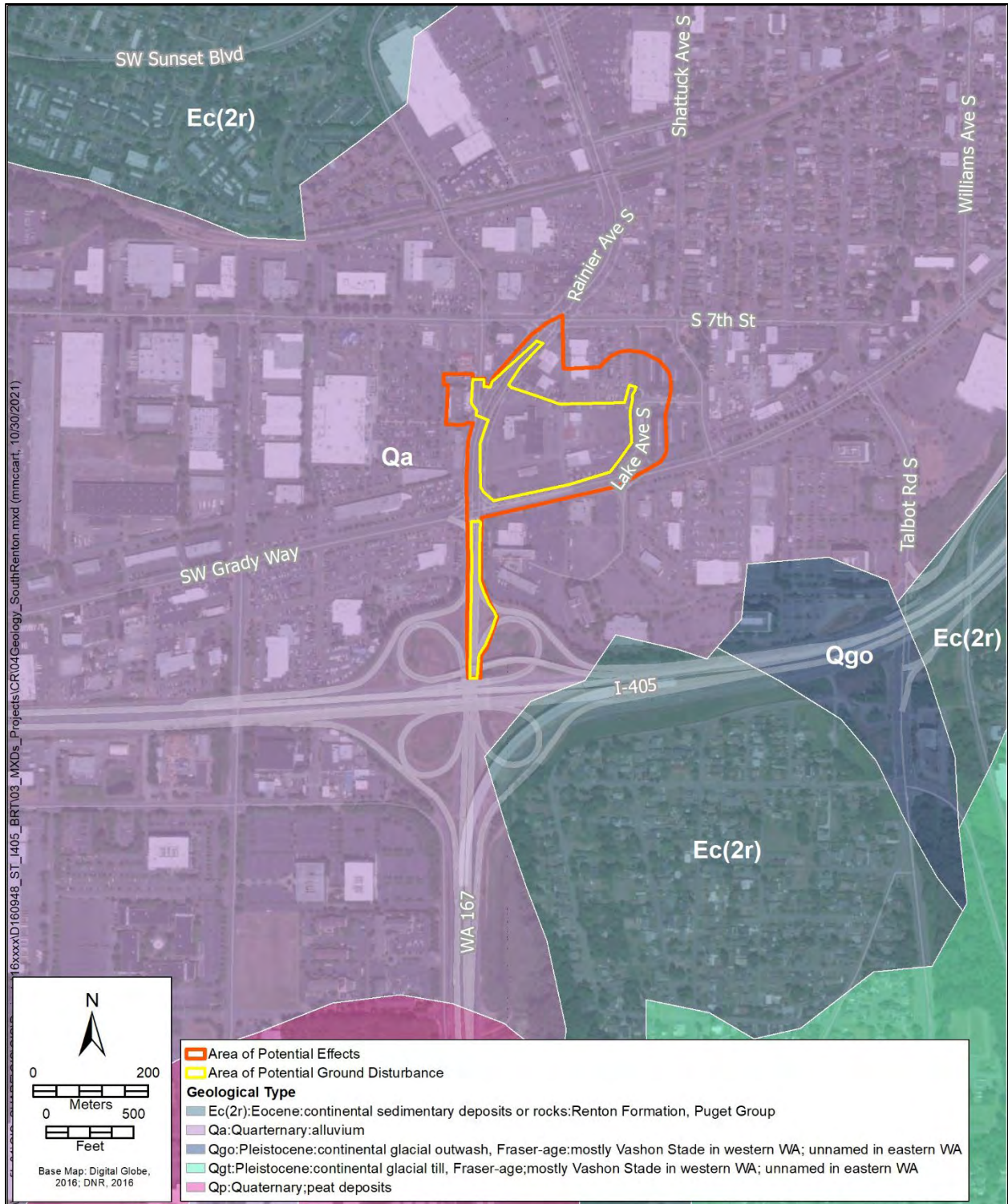
BASEMAP: USGS 1897

Figure 3
1897 USGS topographic map of South Renton Transit Center and Roadway Improvements Project



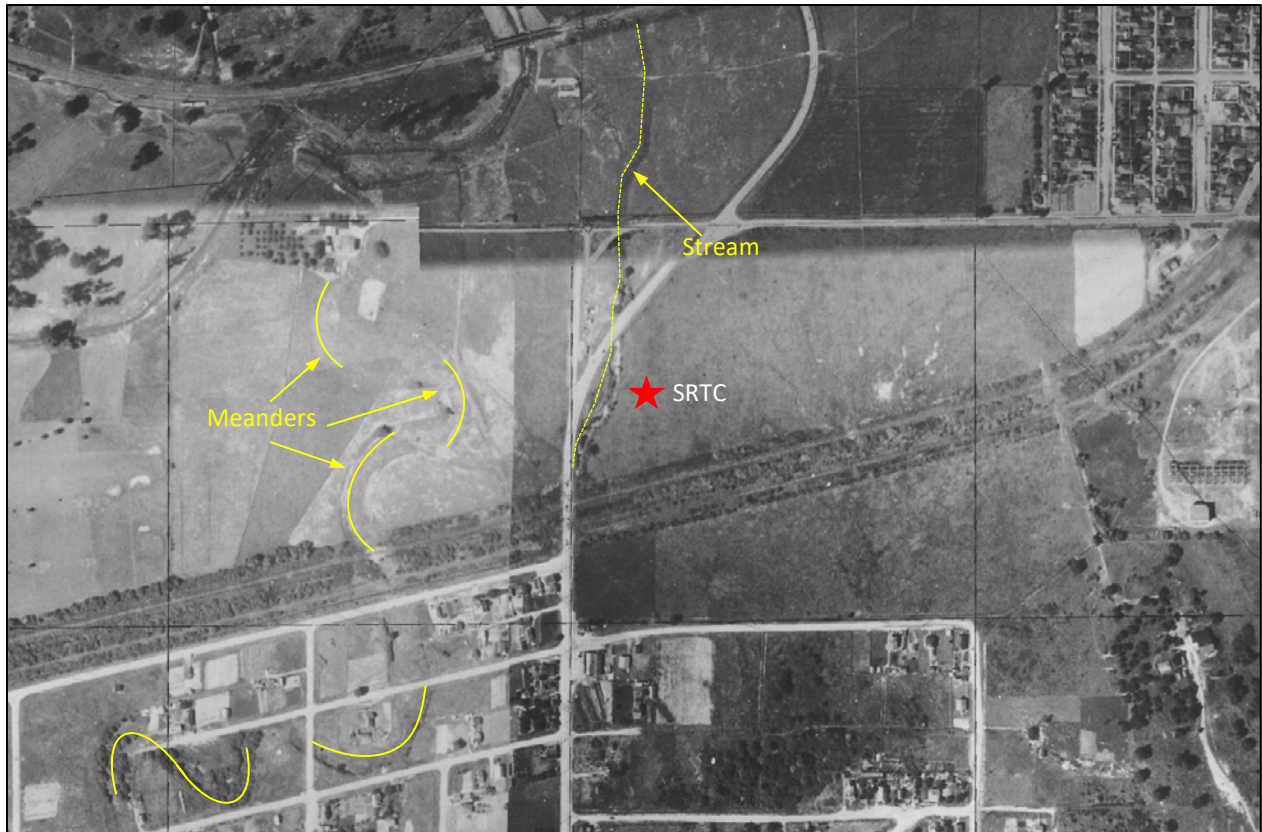
SOURCE: Mullineux 1970

Figure 4
Changes of courses and nomenclature of rivers in the Duwamish Valley, 1899-1959



BASEMAP: Digital Globe 2016; DNR 2016

Figure 5
 Geological Map of South Renton Transit Center and Roadway Improvements Project



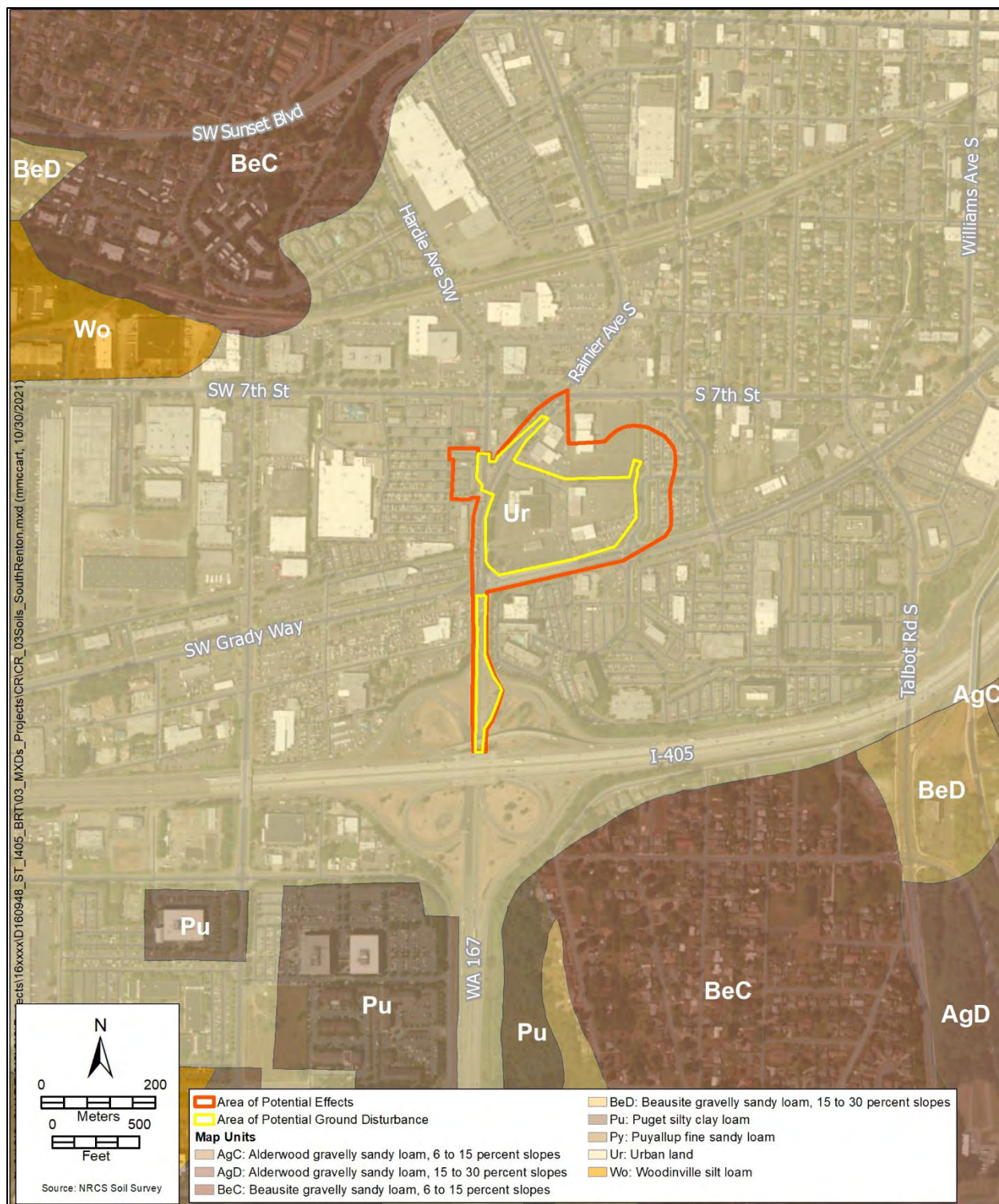
BASEMAP: Pacific Aerial Surveys 1937

Figure 6
1937 aerial photograph showing former stream channel and meanders

A series of four geotechnical borings (BH-7, BH-8, BH-9, and BH-10) at the SRTC site (Sound Transit 2020) completed by HWA Geosciences, Inc. (2020) for this project was consistent with geological mapping and exhibited both fine- and coarse-grained alluvium. Fill was encountered in all four borings to a depth of 7.5 feet below ground surface (bgs), and consisted of very loose to loose, silty sand and gravel. Alluvial sediments were encountered beneath the fill deposit in all borings to the full depths explored (45 to 81.5 feet bgs). The alluvial sediments consisted of interbedded sequences of very loose to medium dense sands, and very soft to very stiff silts, overlying gravel. All of the borings contained a 2.5- to 5-foot thick organic silt layer in the upper 30 feet, and boring BH-08 encountered a 5-foot thick peat deposit at 30 feet bgs. Gravels were encountered in all four borings at depths ranging between 30 and 60 feet bgs

2.2.2 Soils

Soils underlying the APE consist of Urban land (Figure 7). Urban land is not a genetic soil type. Rather, Urban land denotes a condition in which human landscape modifications associated with urbanization and development, such as grading and filling, have obscured natural soils properties. Areas of Urban land are expected to have extensive grading and filling.



BASEMAP: NRCS 2021

Figure 7
Soils Map of South Renton Transit Center and Roadway Improvements Project

2.2.3 Flora and Fauna

The APE was historically classified under the *Tsuga heterophylla* vegetation zone, which encompasses most of Western Washington (Franklin and Dyness 1988). Native species characteristic of this environment include a variety of ferns, Oregon grape, ocean spray, salal, trailing blackberry, red huckleberry, western red cedar, Douglas fir, and western hemlock. Maples, alders, and Himalayan blackberries encroach and flourished where the natural landscape has been disturbed. Native fauna within this region include deer, quail, grouse, weasel, and muskrat. The 1897 USGS Land Classification Map shows the APE as “Cut...Not Restocking” (USGS 1897). Subsequent historic aerial photos show the APE as a mix forested, undeveloped, and agricultural rural until mid-late 20th century.

2.3 Precontact Setting

The precontact cultural chronology of the Pacific Northwest and Puget Sound from the Late Pleistocene onward has been previously summarized (Ames and Maschner 1999; Blukis Onat et al. 2001; Kidd 1964; Kopperl et al. 2016; Matson and Coupland 1995; Nelson 1990). The various chronologies generally agree on broad patterns in culture but may differ regarding the timing and significance of changes in specific aspects of culture, such as subsistence, technology, and social organization. The following discussion of cultural-historical sequence draws broadly on the various chronologies. A five-period timeline is summarized in Table 1 following Ames and Maschner (1999) and the King County Analytic Periods discussed by Kopperl et al. (2016). Settlement in present day King County began over 12,000 years ago with one of the oldest sites in Washington State recorded at Bear Creek (45KI839) located approximately 14 miles NE of the APE. The Late Pacific period overlaps slightly with the Ethnographic period, as discussed below.

TABLE 1
PRECONTACT PERIODS

Period	King County Analytic Period	Approx. Date Range	Characteristics
Late Pacific	5	2500 cal BP – 200 cal BP	Represented by seasonal camps associated with resource procurement and increased variability in burial methods. Site types include winter villages, base camps, field camps, resource gathering sites for hunting, fishing, plants, and quarry sources.
Middle Pacific	4	5,000 cal BP – 2500 cal BP	Represented by large plank houses, increase in decorative items, woodworking tools (adzes, mauls, wedges). Site types include possible villages, base camps, field camps, resource gathering sites for hunting, fishing, plants, and quarry sources.
Early Pacific	3	8,000 cal BP – 5,000 cal BP	Located in marine and estuary settings; represented by large shell middens and decorative artifacts such as labrets and bracelets. Site type include base camps, field camps, and various resources gathering and non-residential sites.
Archaic	2	12,000 cal BP – 8,000 cal BP	Often referred to as Olcott culture and located in riverine and lake settings; represented by cobble tools and lanceolate projectile points. Site type include small residential base camps, field camps, resource gathering and quarry sites.
Paleoindian	1	14,000 cal BP – 12,000 cal BP	Often referred to as Clovis culture, represented by projectile points. This period represents post-glacial entry of humans into the Puget Sound basin. Site types would include small residential base camps, resource gathering near those camps, and isolate finds.

The area surrounding the historic confluence of the Black River and Cedar River is an especially rich archaeological region within the southern Puget Sound. The area contains sites that have contributed key understandings for the region's cultural chronology, including 45KI51 (sba'badi'd), 45KI59 (Tualdad Altu), and 45KI501 and 45KI1010 (Renton High School Site and Renton High School Ball Field Site).

One precontact and one multi-component archaeological site have been recorded within the Study Area just north of the APE. The sba'badi'd site, 45KI51, was initially recorded in 1979 during survey work for development within a portion of the historical Black River Channel alignment (Hanley 1979). This site is associated with the Duwamish village *sba'badi'd* (Hilbert et al 2001:148). The site, listed as a precontact camp with burial, was identified within 1 meter below surface and consists of shallow hearths, structural remains, midden, burnt shell, lithics, fire-modified rock (FMR), faunal bone, and charcoal (Chatters 1981; DAHP 2020; Hanley 1979; Lewarch et al. 1996; Stump 1990). Testing at the site suggested it dates to the historic period circa 1790-1865 (Berger and Hartmann 2007). The Renton Sears-Fred Meyer Store Site, 45KI439, is a multi-component site that was identified during survey work for commercial development in 1994 (Lewarch 1994a). This site consists of midden, FMR, charcoal, calcined bone, and lithic flakes discovered in 1.1-1.4 meters below surface (Lewarch 1994a). A historic-era refuse scatter was also discovered at that time; no dates have been associated with the scatter site (Lewarch 1994a).

2.4 Ethnographic Setting

Renton is located within the traditional territory of the Duwamish *dx^wdəw?abš* (people of the inside), who are part of the larger Southern Coast Salish cultural group. Southern Coast Salish have lived in the area since time immemorial. The traditional language of the Southern Coast Salish is Southern Lushootseed (Suttles and Lane 1990:485). Evidence from oral traditions, ethnographic reports, and archaeological investigations document numerous Duwamish villages along the Cedar River, Black River, lower White (Green) River, Duwamish River, Elliott Bay, Salmon Bay, Lake Washington, and Lake Union (Haeberlin and Gunther 1930; Smith 1940; Spier 1936; Swanton 1979). Descendants of the Duwamish are members of today's non-Federally recognized Duwamish Tribe and the following Federally recognized tribes: Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Suquamish Tribe, Tulalip Tribes, and Confederated Bands and Tribes of the Yakama Nation (Miller and Blukis Onat 2004:24-25, 56-108), as well as other regional tribes through intermarriage.

The Southern Coast Salish culture group shares similarities in language, subsistence patterns, structures, and other cultural practices (Suttles and Lane 1990). Permanent and seasonal campsites were located at specific locations ideal for resource gathering, hunting, and travel. Villages were located at the mouths of rivers, river confluences, and terraces, following a seasonal round for subsistence and resources. Southern Coast Salish relied heavily upon salmon for subsistence, supplementing this diet with other resources found in marsh and river environments. Nearby rivers, lakes, and forests would have provided fishing and hunting opportunities for resources such as salmon, beaver, waterfowl, deer, elk, bear, and other animals.

Non-Native American settlement of the Renton area began in the mid-1800s when settlers started to arrive and reconfigure the land toward their ends. With the passage of the 1850 Donation Land Claim Act, settlers began to claim homestead lands throughout the Pacific Northwest. These early settlements and land claims were focused around key routes of access and areas rich in resources. The traditional mobile subsistence strategies of Native American hunter-fisher-gatherers were increasingly disrupted as

settlement progressed. These impacts on Native American groups within Puget Sound are documented by the treaties that were signed and the reservations that were established where Native American groups were forced to relocate from their traditional lands. The Federal Government negotiated the Treaty of Point Elliott with the Duwamish and 21 “allied tribes” in 1855. Under the provisions of this treaty, ratified in 1859, the U.S. Government established four reservations within the Puget Sound region for the “Duwamish and allied tribes” to reside upon: Tulalip, Port Madison, Swinomish, and Lummi. The Treaty did not create a reservation specifically for the Duwamish and not all Duwamish moved to the established reservations (Lane 1975). The Muckleshoot Reservation was established in 1857 under the Treaty of Medicine Creek and later expanded in 1874 (Lane 1972). Some Duwamish along with several other Native American groups around southern Puget Sound relocated to this reservation. The Duwamish Tribe are actively pursuing federal recognition (U.S. Bureau of Indian Affairs 2020).

Despite settlers’ efforts to displace Native Americans, some Native American families continued to live along the Black and Cedar Rivers, continuing to fish and gather berries for at least the first decade of the 20th century (Lorenz 1980:1). Interviews with Ed Davis, of Snoqualmie and Duwamish descent, recalls the names of Native American families living along the Cedar River as far east as Cedar Mountain (Miller 2014:48-56).

There are three known recorded ethnographic place names approximately located within 0.25 mile of the APE (Table 2) and several more located slightly further afield (Hilbert et al. 2001). The named places include geographical locations and the home of an important tribal member, Mrs. Jimmy Moses.

TABLE 2
RECORDED ETHNOGRAPHIC PLACE NAMES WITHIN 0.25 MILE OF THE AREA OF POTENTIAL EFFECTS

Lushootseed Name	English Translation	Description	Citation¹
<i>sba'badid</i>	crags	For a deep hole in the river with cliffs on both sides, a village site – associated with 45-KI-51	Hilbert et al. 2001:148 (234)
<i>dax'udidaw</i>	Place of little cedar river	A village located near a spring along the Black River	Hilbert et al. 2001:(235a)
<i>skEte'lubc</i>	--	the home of Mrs. Jimmy Moses along the Black River	Hilbert et al. 2001:148(236)

¹ Parenthetical numbers are map locations used in the publication.

2.5 Historical Setting

Renton’s proximity to the Black and Cedar Rivers, Lake Washington, and coal resources in the foothills attracted many non-Native American settlers to the area beginning in the 1850s. At that time, Henry Tobin, Dr. R.H. Bigalow, Obadiah Eaton, and Joseph Fanjoy formed the Duwamish Coal Company and opened a mill site along the Black River (Samson 2014; Slauson 1976). By the time Henry’s wife Diana arrived to the Black River in 1856, the sawmill had been destroyed and Henry succumbed to illness, leaving his land claims to his wife and young son. Erasmus Monroe Smithers, who held a claim adjacent to the Tobin family, eventually married Diana. The Smithers had a successful dairy farm on the Black River but selling off lands that contained a coal seam on Renton Hill led the family to greater success (Samson 2014). Smithers eventually platted and named Renton for Captain William Renton, an investor

of the coal mines (Slauson 1976). The Smithers' farm employed local Duwamish who continued to live in the area; their first child Ada learned to speak Chinook Jargon as a result of the family's relationship with the Duwamish (Samson 2014).

Renton incorporated in 1901; the coal industry continued to thrive in the area through the late 19th and early 20th centuries. More businesses developed along the Black and Cedar Rivers fueled by nearby coal, including Renton Clay Works and Pacific Car and Foundry. Schools, churches, general stores, a voluntary fire department, municipal water supply, and rail depots were a result of the bustling community. In 1911, a great flood hit Renton. A dam breach that released reservoir waters from upriver devastated the Renton area inundating the Black, Cedar, and Duwamish Rivers (Monahan 2009; Slauson 1976). As a result, the Waterway District No. 2 was formed and a decision to channelize the Cedar River was made (Monahan 2009; U.S. Army Core of Engineers 1997). By 1916, the Seattle Ship Canal was being built and Lake Washington's level lowered, the Cedar River had been rerouted to drain into Lake Washington and the Black River ceased to exist at the new water level (Ott 2012). Portions of the old river channel and marshlands were filled with slag obtained from the Renton coal mines to fill in the lands (Celmer 1995; Williams 2015).

By this time, the Northern Pacific & Puget Sound Shore Railroad Company had a line running north/south along the Duwamish east of Renton, and the Columbia & Puget Sound Railroad Company (C&PSR) had a line running east/west passing through Renton (Robertson 1995:204; U.S. Geological Survey 1897; 1900, 1913). Initially formed as the Seattle & Walla Walla Railroad & Transportation Company in 1873 the C&PSR eventually laid track extending to other nearby townsites including Newcastle and Coal Creek in 1891 (Hudson 1996; Robertson 1995:204). C&PSR later consolidated to the Pacific Coast Railway Company in 1916 and eventually sold to Burlington Northern in 1970 (Hudson 1996; WSDOT 2020). This line helped move coal resources from the Renton area to the greater Seattle area.

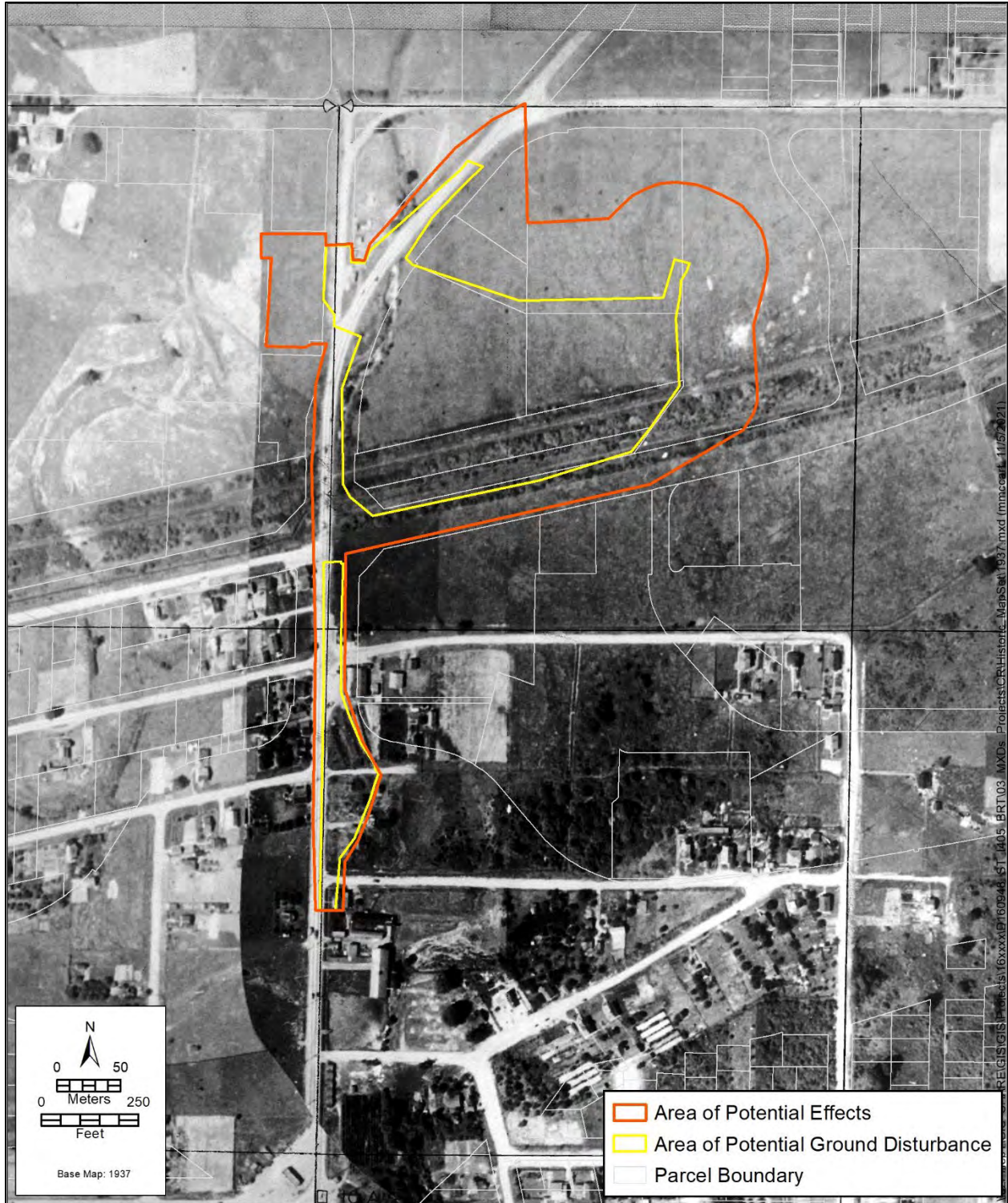
By the 1920s, Northwest Air Services operated an airstrip and sea-plane facility at Bryn Mawr, now the Renton Municipal Airport (Davies and Ellis 2009:63; Stewart 2012). An international mail service was based at the strip for a brief period before relocating back to Seattle (Slauson 1976). WWII in the 1940s gave cause for increased production of military craft. Pacific Car and Foundry began producing Sherman Tanks and aviation really took off at Renton. A new facility was constructed at Renton by the U.S. Navy and Boeing was contracted to build aircraft at the plant (Slauson 1976; Mead & Hunt 2018). In 1943, the U.S. Navy transferred the manufacturing site to the U.S. Army, and additional land was purchased to create the Renton airfield, where the B-29 Superfortress would be made (Boeing 2020; Slauson 1976). By the end of the war, production stopped, and the Renton facility remained dormant until 1948, (Slauson 1976). During this time it was used as storage and a temporary home for a circus (Boeing 2020). The City of Renton eventually took ownership of the Airport and the Boeing Company continued manufacturing at Renton.

The mid-20th century saw aviation and manufacturing increase in the area. Boeing began producing commercial airplanes, which started with the Dash 80 in 1954 (Boeing 2020). By the late 1970s Boeing was producing military and commercial ships along with aircraft at the plant (Boeing 2020). Renton continued to grow as infrastructure and major highways increased access to the surrounding area, including the completion of I-405 through Renton in the 1960s along the former State Highway 1 alignment. Commercial development of Renton continued throughout the late-20th century (NetrOnline 2020; USGS 1956, 1969, 1976).

When first surveyed in 1865, a trail led up the White River and a Black River tributary ran just north of the current South Renton Transit Center; a nearby dwelling that belonged to Edmund Carr was also recorded (U.S. Surveyor General 1865). Land patents for this location were issued to Carr on October 1, 1875 and Antonio Maria and Juan Jose Aragon along with Carr on July 30, 1873 (U.S. BLM 1997). By 1907, Jane B. Wolsworth and P.D. Hamlin owned portions of the Study Area; the Northern Pacific Railway (NPR) also ran through the APE at about Grady Way and the C&PSR had a line running through the northern portion of the Study Area (Anderson Map Company 1907; USGS 1897). By 1912, a second, shorter electric railway—a Renton branch of the Puget Sound Electric Railway (PSER)—had been built just south of the NPR.

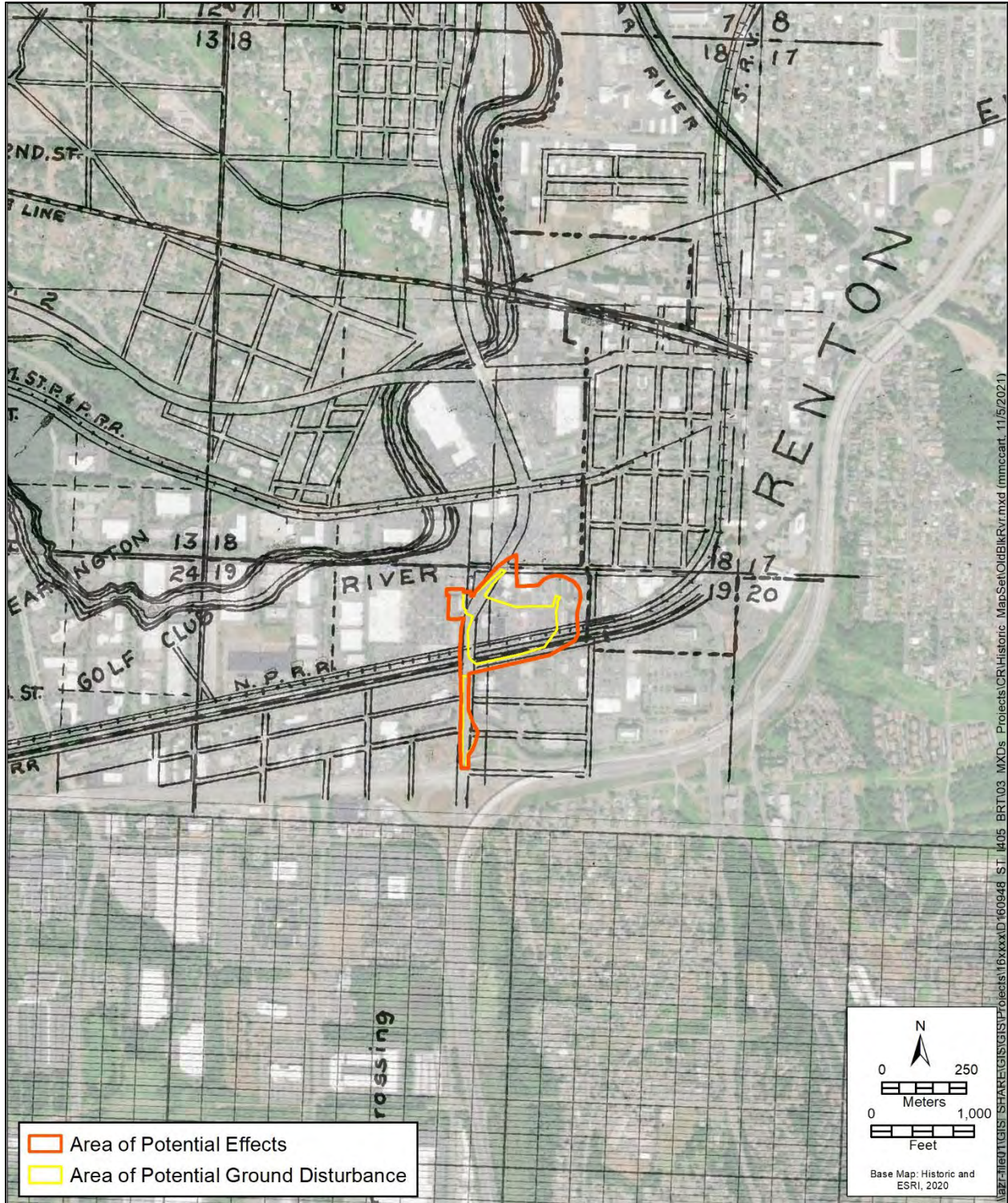
Paved roads were in place by 1926, and Renton continued to develop northeast of the APE (Anderson Map Company 1907; Denton 1914, 1915; Kroll Map Company 1912, 1926). By 1936, several plats of land and unpaved roads were in place in the area and the Black River was shown as “dry” (Metsker Map Company 1936). Aerial photography from the 1930s show the area as agricultural and undeveloped with railroads and dirt roads in place at the current alignments and just north of Grady Way and Rainier Avenue (Figure 8) (NetrOnline 2020; Pacific Aerial Surveys 1937). Clearing and ditching of the abandoned Black River Channel were in development during this time (Figure 9). Historic property records indicate portions of the land for the proposed SRTC were owned by Victor [Vic] Diambri, beginning in the 1940s (King County Assessor 1937-1972a; Polk 1940:426, 1954:74). Property records list a single family home, duplex, barn, and fruit stand among the buildings that once stood within the Area of potential ground disturbance (King County Assessor 1937-1972a). These buildings can be viewed on a 1954 aerial also showing agricultural land within the surrounding APE (Figure 10). By 1964, a large structure had replaced these earlier buildings, and cloverleaf interchange of I-405 had been completed (King County Aerial Survey 1954, 1965; NetrOnline 2020). By 1968, the earlier (1964) building was replaced and several other commercial buildings were in the area (*Seattle Daily Times* 1968).

The NPR was ultimately subsumed into the Burlington Northern Railway and the segment crossing the Project’s APE was abandoned. The PSER was likewise abandoned. Removal of PSER lines along its route commenced in 1930 (Wing 1995), although ESA was unable to determine whether the PSER segment with the APE was removed or paved over. Likewise, ESA was unable to establish whether the NPR line was removed or paved over. If the lines were not removed prior to site development, however, it is likely they were substantially disturbed during grading and filling.



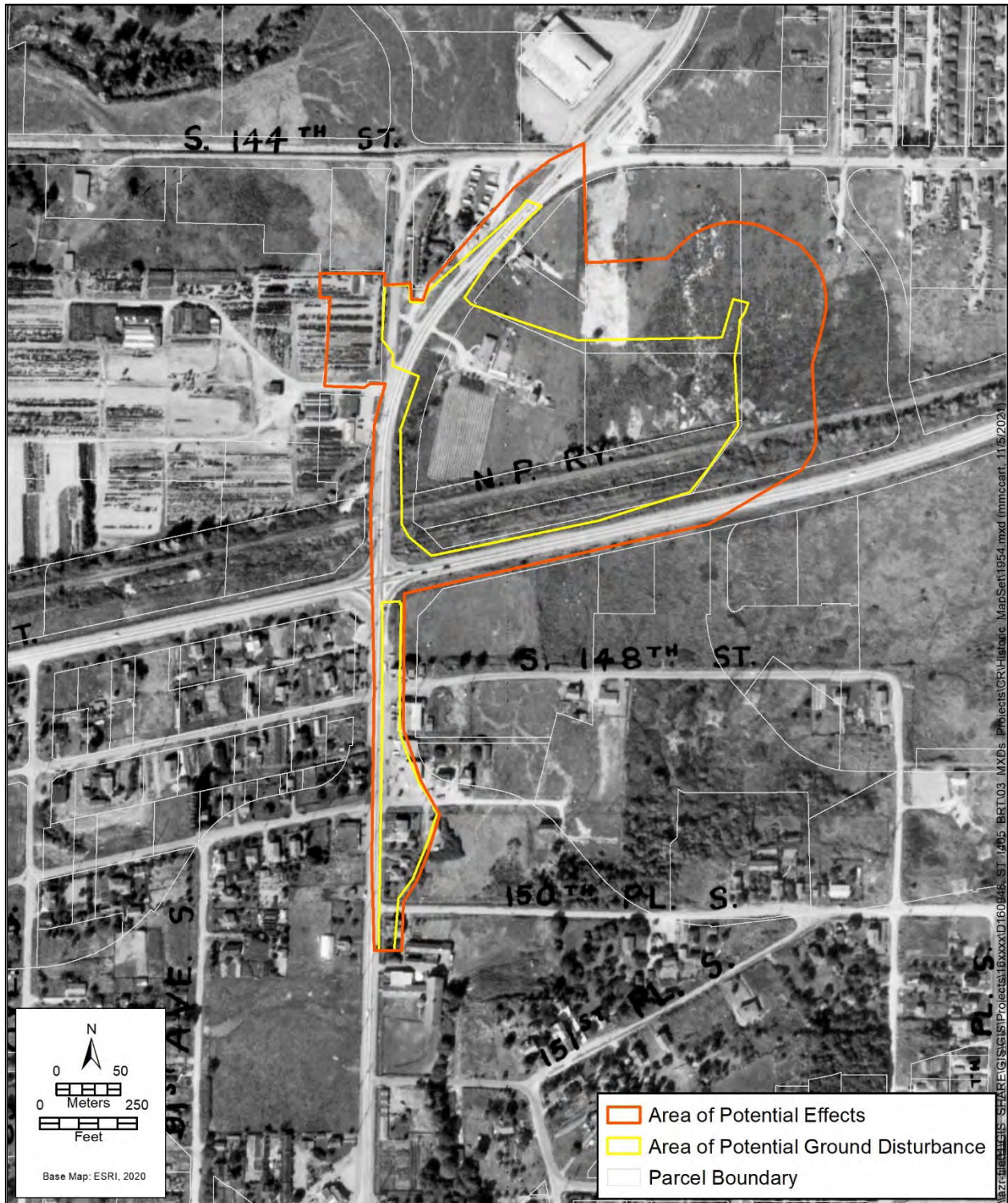
BASEMAP: Pacific Aerial Surveys 1937

Figure 8
1937 aerial photograph of South Renton Transit Center and Roadway Improvements Project



BASEMAP: King County
Roads Map
Vault ca. 1935-
1941

Figure 9
Map showing proposed clearing and ditching of Old Black River Channel to improve drainage and sanitary conditions, ca. 1935-1941



BASEMAP: King County Aerial Surveys 1954

Figure 10
1954 aerial photograph of South Renton Transit Center Project

2.6 Existing Cultural Resources

ESA conducted a records search of DAHP's WISAARD system on April 10, 2020 and August 4, 2021 (DAHP 2020, 2021). There are 17 prior cultural resources assessments (Table 3), six recorded sites, one recorded cemetery/burial site, and no recorded Traditional Cultural Properties, within the Study Area of the Project. There are no determined eligible for listing in the NRHP or NRHP-listed built environment resources within the Study Area.

2.6.1 Prior Cultural Resources Assessments

There are 17 previously conducted cultural resource assessments within 0.25 mile of the APE (Table 3). Of these, nine are located within or overlap the APE. Three of the assessments (Lockwood et al. 2020; Schneider et al. 2021; Valentino 2017) were conducted for the Project and identified historic-aged built environment resources.

TABLE 3
CULTURAL RESOURCE ASSESSMENTS WITHIN 0.25 MILE OF THE AREA OF POTENTIAL EFFECTS

Approximate Distance from APE	Cultural Resources Identified in Study Area	Project	NADB	Citation
Within	Historic-aged built environment resources	South Renton Transit Center Site Building Demolition Project, Historic Resources Inventory and Evaluation	n/a	Schneider et al. 2021
Within	Historic-aged built environment resources	Contract No. D120673, Work Order 84 – Renton Properties Historic Property Evaluations	n/a	Valentino 2017
Overlaps	Historic-aged built environment resources	I-405 BRT Historic and Archaeological Resources Technical Memorandum.	n/a	Lockwood et al. 2020
Overlaps	45KI285	Cultural Resources Inventory of the Proposed Washington Light Lanes Project	1339887	Juell 2001
Overlaps	None	Cultural Resources Survey Interstate 405 Corridor Survey: Phase 1 Interstate 5 to State Route 169 Improvements Project	1352447	Bundy 2008
Overlaps	Historic-aged built environment resources	Cultural Resources Discipline Report for the Burien to Renton RapidRide Project- F Line, NEPA Documented Categorical Exclusion; Final Historical, Archaeological and Cultural Resources Discipline Report	1354596	Rooke 2010
Overlaps	Historic-aged built environment resources	Cultural Resources Survey for the WSDOT's I 405/SR 167 Direct Connector Project	1686391	Smith et al. 2014
Overlaps	None	Cultural Resources Assessment for the Rainier Avenue South Transit Improvement and Shattuck Avenue South Storm Drain Project, City of Renton	1352458	Berger and Hartmann 2009
Overlaps	None	Cultural Resources Discipline Report for I-405, Renton Nickel Improvement Project I-5 to SR 169	1346750	Bowden and Dampf 2005
0.05 mile north	45KI759	Archaeological Assessment of the Bob Bridge Toyota Expansion Project, Renton	1682766	Kaehler 2007
0.10 mile west	None	Cultural Resources Inventory of the Columbia Bank Parcel	1350292	Smith and Hoffman 2007

Approximate Distance from APE	Cultural Resources Identified in Study Area	Project	NADB	Citation
0.15 mile north	45KI538	Cultural Resources Assessment for the Rainier Avenue/Hardie Avenue Project: Rainier Avenue and Shattuck Avenue Railroad Bridge Replacement	1349985	Berger and Hartmann 2007
0.15 mile north	None	Cultural Resources Assessment for the Renton Center Senior Living Project	1690970	Metz and Cooper 2014
0.20 mile west	Historic-aged built environment resources	Cultural Resources Discipline Report for the RapidRide-F Line, NEPA Documented Categorical Exclusion Project- Addendum: Historical, Archaeological, and Cultural Resources Discipline Report- Addendum	1683232	Rooke 2012
0.20 mile northwest	None	Results of Cultural Resources Monitoring for the SW 7th Street/Naches Avenue SW Storm System Improvement Project-Phase 2. SWCA Project No. 24076	1691963	Carrillo et al. 2016
0.20 mile northwest	45KI51	Archaeology of the Sbabadid Site 45KI51, King County, Washington.	1331023	Chatters 1981
0.20 mile northwest	45KI439	Cultural Resources Field Assessment of the Fred Meyer Corporation Building Project	1334401	Lewarch 1994b

Source: DAHP, 2020, 2021a; NADB = National Archaeological Database Report Number

2.6.2 Recorded Archaeological Resources

No archaeological sites have been recorded within the APE. Seven archaeological sites have been recorded within the 0.25 mile of the APE (Table 4). The closest archaeological site mapped in WISAARD is a portion of an abandoned historic railroad grade, 45KI285, approximately 320 feet west of the APE; mapping in the original site form and WISAARD database differ slightly. Historic maps and online resources indicate the railroad runs through the area of potential ground disturbance (Anderson Map Company 1907; U.S. Geological Survey 1900, 1913; WSDOT 2020). This site has not yet been evaluated for listing in the NRHP.

TABLE 4
RECORDED ARCHAEOLOGICAL SITES WITHIN 0.25 MILE OF THE AREA OF POTENTIAL EFFECTS

Historic Register Status	Site Number	Site Name	Site Type	Description
NRHP: Not evaluated	45KI51	sba'badi'd	Precontact Camp, Lithic Material, Burial	Precontact sites associated with <i>Sbabadid</i> . midden, structures, burnt shell, charcoal, faunal, lithics, and a burial later discovered in 1991.
NRHP: Not evaluated	45KI285	--	Historic Railroad Properties	Abandoned railroad grade c. 1874
NRHP: Not evaluated	45KI439	Renton Sears-Fred Meyer Store Site	Precontact Camp, Feature, Lithic Material & Historic Debris Scatter	Precontact midden, flakes, hearths with calcinated bone, FMR and charcoal Historic debris
NRHP: Determined Not Eligible	45KI538	Columbia and Puget Sound Railroad	Historic Railroad Properties	Portion of railroad grade ca.1874-1970
NRHP: Not evaluated	45KI759	Bob Bridge Toyota Site	Historic Debris Scatter	Glass, ceramic, saw-cut bone, toy, wood, and metal, ca.1900-1940

Historic Register Status	Site Number	Site Name	Site Type	Description
NRHP: Not evaluated	45KI1206	--	Historic Debris Scatter	Metal, glass, porcelain, plastic bottles c1951-1962
NRHP: Not evaluated	45KI1210	Black River Pilings	Historic Public Works	Wood pilings pre-1916

NRHP = National Register of Historic Places

2.6.3 Cemeteries

As discussed in Section 2.2.2, one precontact burial site has been recorded within the Study Area. This burial was identified in 1990 and is associated with the 45KI51 (sba'badi'd) (DAH 2020; Stump 1990). No formal cultural resources assessment is on file with DAHP for this discovery (DAH 2020; Lewarch et al. 1996:7). In 1990, BOAS archaeologists identified partial human remains in the vicinity of a large oak tree while testing the area which involved "...only the blading of the upper portion of the property" (Lewarch et al. 1996; Stump 1990). Associated cultural materials were identified with the burial, Stump noted the site had likely been previously disturbed and the recovery was consistent with tree burials suggesting the oak tree may have been used as a platform (Lewarch et al. 1996; Stump 1990). Additionally, Stump suggested there may be additional human remains or artifacts in the vicinity (Lewarch et al. 1996; Stump 1990). The site is not within the APE.

2.6.4 Built Environment Resources

There are no determined eligible for listing in the NRHP or NRHP-listed historic-aged built environment resources within the Study Area. Nine aboveground built environment resources are located within the APE (Table 5; Figure 11). Of these, four are considered historic-aged¹; these have all been determined not eligible for listing in the NRHP by SHPO. Three of these resources were submitted to SHPO as part of an earlier SEPA phase of this Project (DAH Property IDs 343450, 713411, 713412; Appendix D) (Schneider et al. 2021).

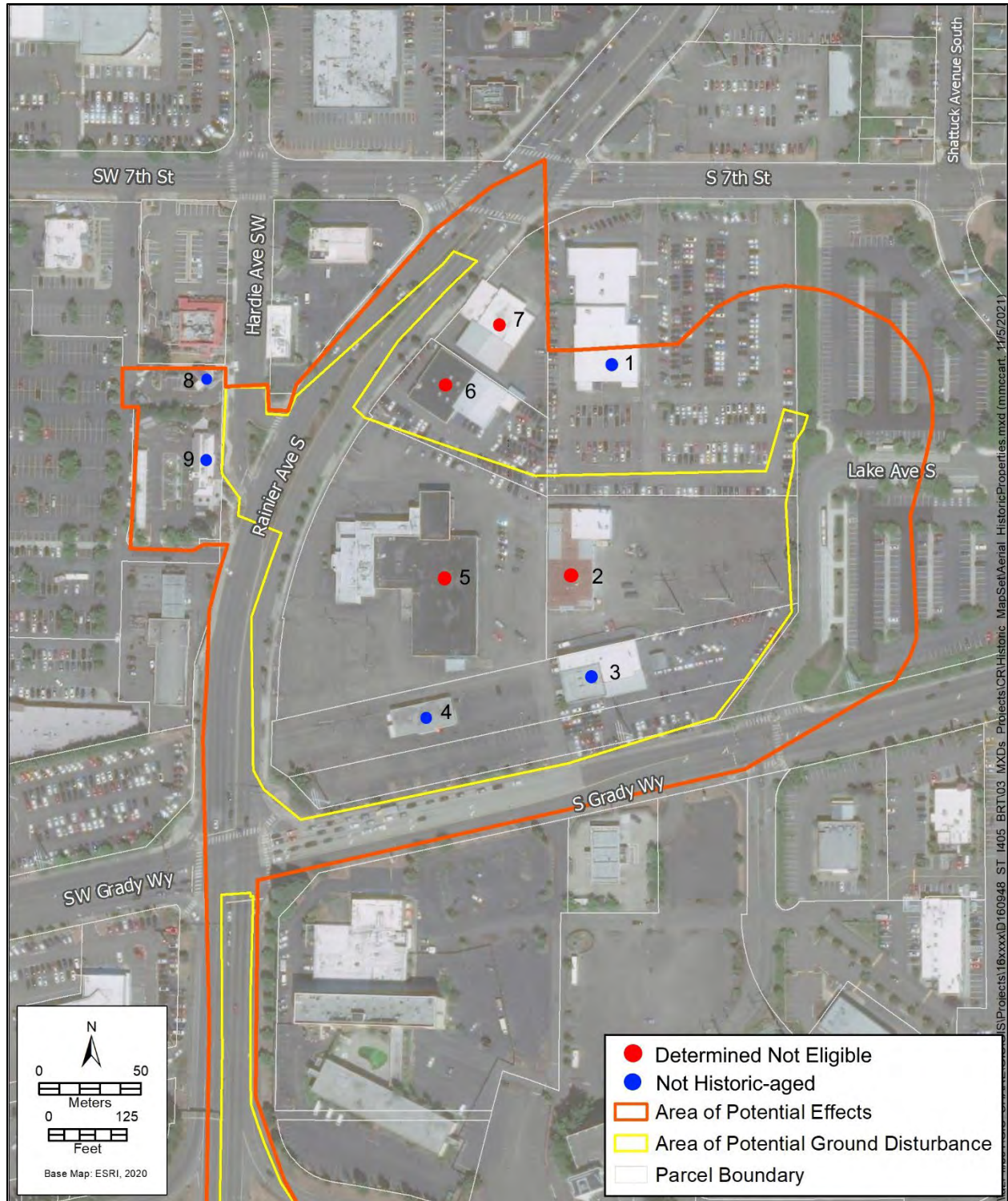
TABLE 5
BUILT ENVIRONMENT RESOURCES WITHIN THE AREA OF POTENTIAL EFFECTS

Map ID Number	Address / Parcel	Use	Impact	Historic Register Status ¹	Year Built	DAH Property ID	Comment
1	201 South 7th Street / 192305-9031	Commercial / Auto	Indirect	NA	1985	NA	less than 50 years old
2	720 Rainier Avenue South Building 2 / 192305-9063	Commercial / Auto	Direct	Determined Not Eligible	1971	713412	demolished 2021 / SHPO determination 2021
3	200 South Grady Way Building 2 / 192305-9068	Commercial / Auto	Direct	NA	1986	NA	demolished 2021 / less than 50 years old at time of demolition
4	200 (750) South Grady Way Building 1 / 192305-9068	Commercial / Auto	Direct	NA	1983	NA	demolished 2021 / less than 50 years old at time of demolition

¹ Historic-aged built environment resources are those that would meet the NRHP minimum age threshold for consideration as a Historic Property (50 years or older) at the time of Project construction. This Project is anticipated to begin in 2021. Therefore, resources built in or before 1971 are considered historic-aged and included in this review.

Map ID Number	Address / Parcel	Use	Impact	Historic Register Status ¹	Year Built	DAHP Property ID	Comment
5	750 Rainier Avenue South / 192305-9035	Commercial / Auto	Direct	Determined Not Eligible	1968	713411	demolished 2021 / SHPO determination 2021
6	720 Rainier Avenue South Building 1 / 192305-9053	Commercial / Auto	Indirect	Determined Not Eligible	1965	343450	SHPO determination 2021
7	710 Rainier Avenue South / 192305-9044	Commercial / Auto	Indirect	Determined Not Eligible	1954	342958	SHPO determination 2013
8	735 Hardie Avenue Southwest / 192305-9104	Restaurant / Coffee	Indirect	NA	2017	NA	less than 50 years old
9	741 Rainier Avenue South / 192305-9104	Restaurant	Indirect	NA	2018	NA	less than 50 years old

Source: King County Assessor 2021 and DAHP;
1= Previous determinations / NRHP



SOURCE: ESA 2021

Figure 11
Aerial view of South Renton Transit Center and Roadway Improvements
Built Environment Resources

2.7 Expectations

2.7.1 Precontact-Era Resources

The APE is classified as High to Very High Risk in DAHP's statewide predictive model for containing precontact-era archaeological sites (DAHP 2010). The statewide predictive model is a tool used by archaeologists and planners to evaluate potential archaeological risks on a broad scale. The model was developed to statistically evaluate multiple environmental factors (e.g., elevation, slope percent, aspect, distance to water, soils, and landforms) to predict where archaeological resources might be found (Kauhi 2013). It is not a substitute for conducting site-specific subsurface investigations.

The area encompassing the historic Black River floodplain is well-known for containing significant precontact-era archaeological sites. The APE is situated on this floodplain and is underlain by Holocene-aged alluvial sediments with the potential to contain buried, intact precontact archaeological sites. However, important precontact village and camp sites, including 45KI51 (sba'badi'd), 45KI59 (Tualdad Altu), and 45KI501 and 45KI1010 (Renton High School Site and Renton High School Ball Field Site), are located either along the incised old channel of the Black River, or near the confluence of the Black River and Cedar River. Compared to the APE, these locations offered permanent fresh water and canoe access, and probably a greater amount and diversity of subsistence resources. As a result, precontact archaeological sites, if present within the APE, could be expected to be relatively ephemeral manifestations related to temporary or short-term subsistence activities.

2.7.2 Historic-Era Resources

The APE was primarily rural and agricultural into the 1950s. Archaeological remains associated with agriculture and other commercial pursuits may be present within the APE. Additionally, historic maps show the Northern Pacific Railway and Puget Sound Electric Railway once ran adjacent to the current alignment of Grady Way through the southern portion of the APE. However, site preparation for construction of the automobile dealerships and other commercial buildings within the APE is likely to have disturbed or removed most historic period remains that may have been present.

2.7.3 Built Environment Resources

Based on the setting discussed above, ESA anticipates the Project will have direct or indirect impacts to historic-aged built environment resources. The four historic-aged built environment resources within the APE have all been determined not eligible for listing in the NRHP by SHPO. Two of those resources, are located in the area of potential ground disturbance and would be directly impacted by the Project due to demolition that occurred in 2021. Additionally, the area of potential ground disturbance contains a 1983 building and a 1986 building; both buildings were demolished in 2021 and, therefore, will not be present when the transit center facilities or park-and-ride garage are constructed. Other historic-aged built environment resources within the APE may be indirectly impacted temporarily during construction for the Project.

Current anticipated upgrades and revisions along Rainier Avenue South between Southwest 7th Street and I-405 will remain within the road right-of-way and include removal and revision of existing medians, upgrades to existing utilities as needed, upgraded pavement and marking, and a revised landscaped curb

at Hardie Avenue Southwest with a new traffic signal. This new signal and island revision are adjacent to two modern-era buildings and will therefore not directly or indirectly impact any historic-aged built environment resources. Improvements to the four SRTC parcels (1923059035, 1923059063, 1923059068, and 1923059074) and along Lake Avenue South to the east of those parcels include improved pedestrian and traffic access, the new park-and-ride garage, bus loop, transit center islands, and associated passenger and employee amenities. The resources to be demolished for this Project have been previously documented and determined not NRHP-eligible by SHPO.

3. ARCHAEOLOGICAL ASSESSMENT

ESA performed a pedestrian reconnaissance of the APE in December 2019 and archaeological borings in July 2021.

3.1 Pedestrian Survey

In December 2019, ESA Archaeologist Bryan Hoyt performed a pedestrian reconnaissance from publicly accessible rights-of-way to assess the existing ground conditions and the potential for conducting archaeological subsurface survey using shovel probes or hand-driven auger probes.

The project is within an area that has been extensively developed and urbanized and is currently for car sales and repair businesses (Figure 12). Very few non-paved areas exist, and these are confined to small grass and planting strips. This area has been at least superficially graded flat for use as parking area as well as extensively disturbed at the location of multiple buildings. Buried utilities are prevalent along the street margins (Figure 13) as well as occasionally extending across the site, feeding multiple buildings and light poles. Large aboveground power lines are located at the southern end (oriented east/west), as well as along the eastern end (oriented north/south). The area appears to be at or near the historic/native ground surface (no major grade changes with neighboring properties), but is 99 percent paved. Based on results of the pedestrian survey, Sound Transit and ESA determined that subsurface survey with hand tools was not feasible.

3.2 Geoarchaeological Borings

Based on the presence of deeply buried, organic Holocene alluvium demonstrated in the October 2019 borings (HWA Geosciences, Inc. 2020), Sound Transit requested that a series of geoarchaeological borings be completed to further examine the archaeological potential of the SRTC. Chris Lockwood, ESA Geoarchaeologist, prepared an archaeological boring work plan to conduct 15 geoprobes across the SRTC parcels (Figure 14). Ultimately, due to conflicts with existing utilities, only 12 of the 15 borings could be conducted.

Geoarchaeological borings were conducted by Holt Drilling in July 2021. Borings were 2-inch-diameter, continuously-sampled, sleeved, direct-push geoprobes advanced up to a target of 50 feet bgs. ESA Archaeologist Micca A. Metz and Rowan Leinart conducted field analyses of all archaeological borings with periodic assistance from Chris Lockwood; all three workers are 40-hour HAZWOPER-trained. Geoprobe sleeves were opened, and contents photographed, described, and screened through ¼-inch hardware mesh on-site. Due to risk for soil contamination, all cuttings were retained on-site and drummed for disposal with local and state requirements. Where present, twigs, seed pods, and other plant organics were collected in the event radiometric dating was desired. These materials were bagged in inert polyethylene 4 mil zip top bags with proveniences recorded, logged on a bag list, and stored temporarily at ESA.



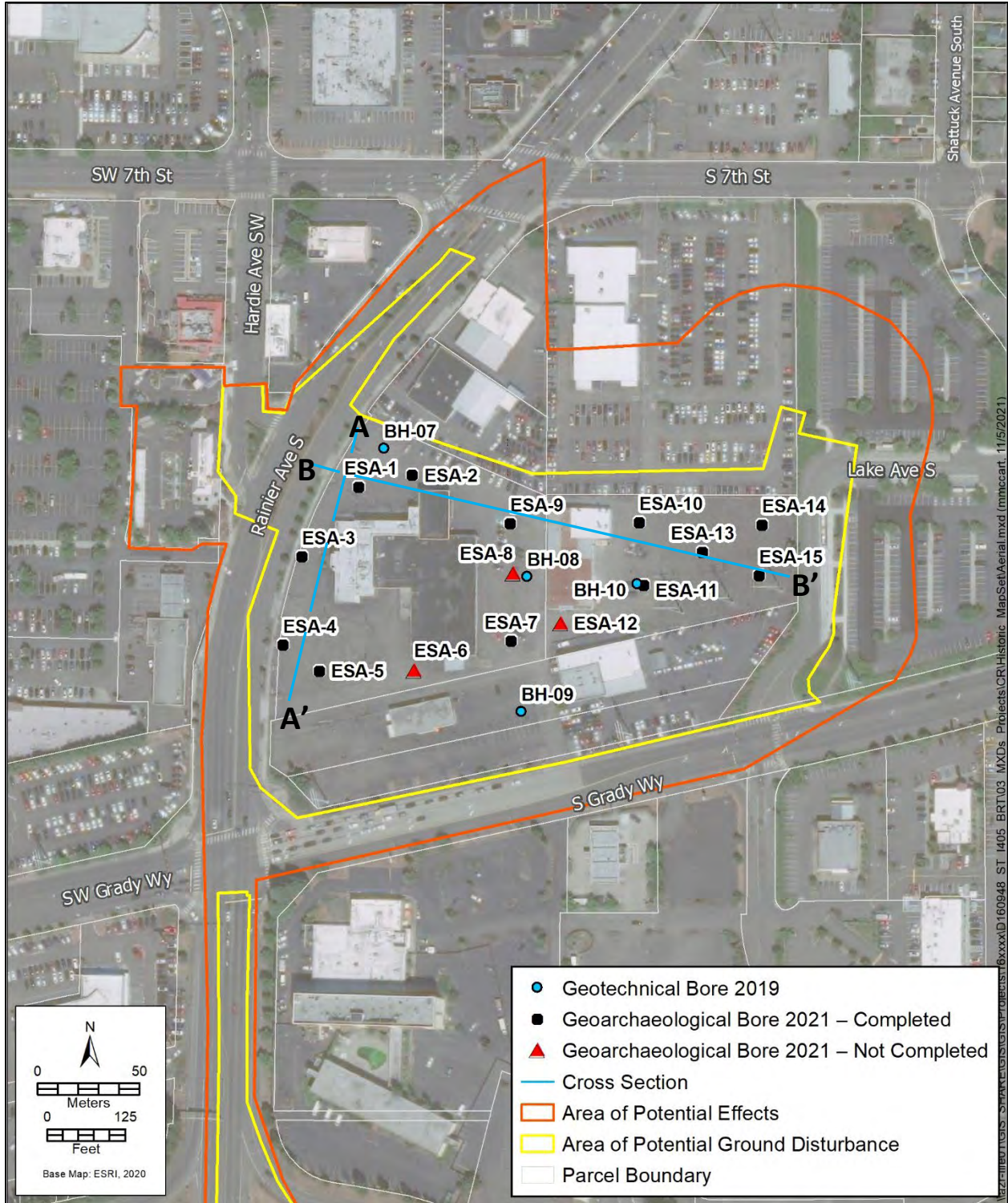
SOURCE: ESA 2019

Figure 12
Overview of western portion of planned South Renton Transit Center; view to north



SOURCE: ESA 2019

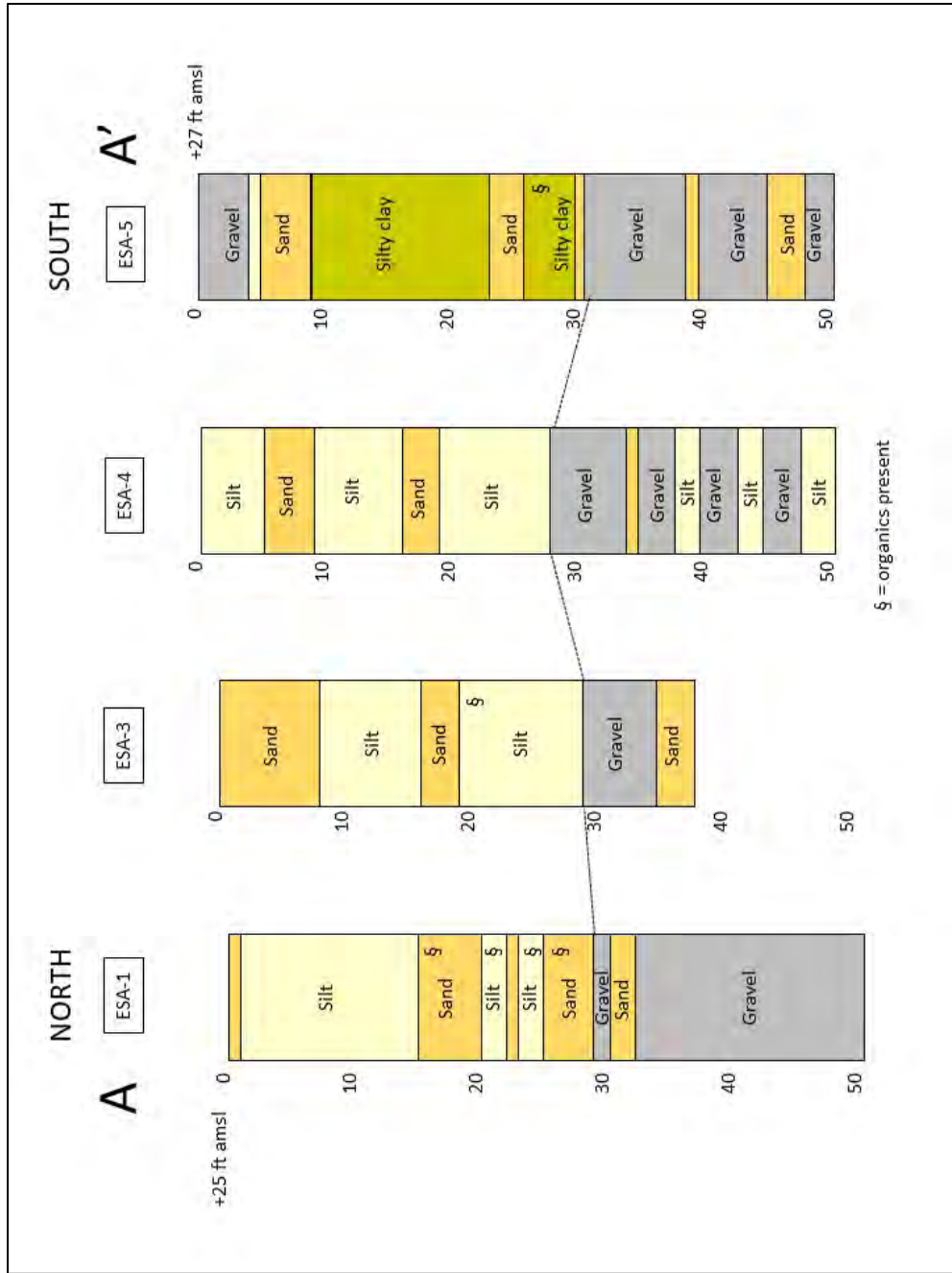
Figure 13
Overview of southern end of the planned South Renton Transit Center; view to east



SOURCE: ESA 2021

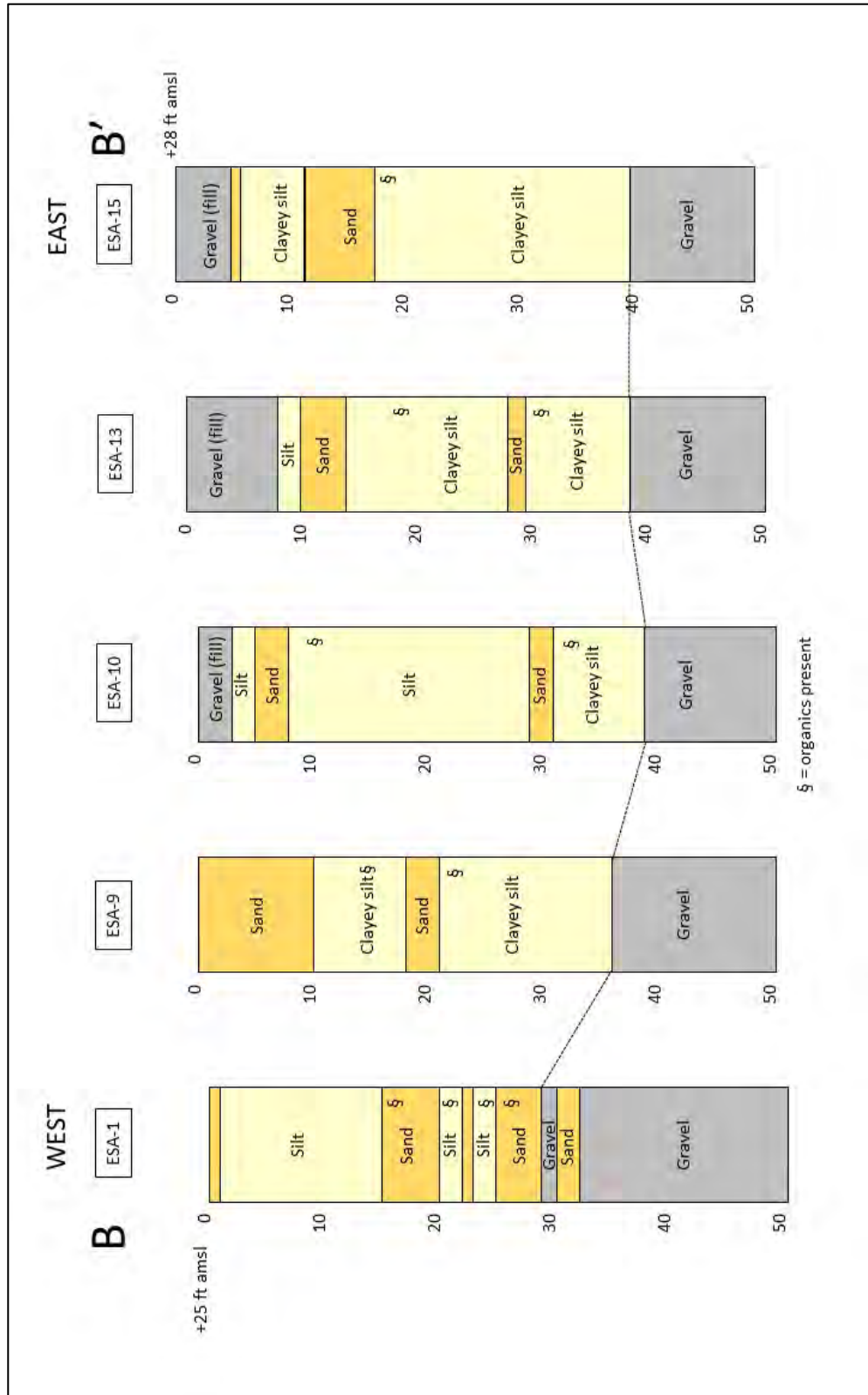
Figure 14
Locations of Geotechnical and Geoarchaeological Bores for the South Renton Transit Center and Roadway Improvements Project

Stratigraphic data for all geoarchaeological borings is presented in Appendix B. Borings generally exhibited a similar stratigraphic pattern of gravelly to sandy imported fill, overlying fine-grained alluvium (fine sand, silt, clay), overlying sandy gravel (Figure 15; Figure 16). Imported fill was easily recognized by the presence of near surface gravel with sand extending up to 10 feet bgs; sparse demolition debris was also observed within the fill. Underlying the fill were alternating layers of silt (also clayey silt to silty clay) and fine sand representing repeated overbank flooding events. The presence of uncarbonized organics (twigs, bark, seed pods) suspended in fine alluvium (silt) in multiple borings suggests the APE may have been relatively marshy. Trace charcoal fragments were observed in the fine alluvium only in two borings (ESA-7 and ESA-12). The thickness of the alluvial fines – commonly 25 or more feet thick – and evidence for multiple depositional events suggests that the APE was within the true floodplain, as opposed to situated on a natural sand levee, for a protracted period. Channel gravels to coarse sand were encountered in all borings at depths ranging between 29 and 40 feet bgs. These deposits represent a period in which the channel meandered across the valley, resulting in cut and fill lag deposits. The top of channel gravels was encountered at shallower depths in the western portion of the APE and at greater depths towards the east (see Figure 16). Importantly, no stable buried surfaces were identified in the continuous samples analyzed by ESA.



SOURCE: ESA 2021

Figure 15
Stratigraphic Cross-section (north to south). Dotted line is top of channel gravel



SOURCE: ESA 2021

Figure 16
Stratigraphic Cross-section (west to east). Dotted line is top of channel gravel

4. SUMMARY AND RECOMMENDATIONS

4.1 Evaluation Criteria

This report evaluates identified resources under the criteria established by the National Historic Preservation Act to evaluate resources for their potential eligibility to be listed in the NRHP. For a property to qualify for the National Register it must meet one of the NRHP criteria for evaluation by being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance (National Park Service 1997).

4.1.1 Criteria

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of significant persons in or past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded or may be likely to yield, information important in history or prehistory.

4.1.2 Integrity

Properties must also retain integrity. Integrity is the ability of a property to convey its significance. The seven aspects of integrity are: Location, Design, Setting, Materials, Workmanship, Feeling, and Association. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.

Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity.

To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.

4.2 Recommendations

4.2.1 Built Environment

As noted in Section 2.6.4, four historic-aged built environment resources are located within the APE. All have been previously determined not eligible for listing in the NRHP; two of these resources, located within the area of potential ground disturbance, were demolished in 2021 (DAHP 2021; Schneider et al. 2021). Additionally, the area of potential ground disturbance contains a 1983 building and a 1986 building; both buildings were demolished in 2021 and, therefore, will not be present when the transit center facilities are constructed (Schneider et al. 2021). ESA recommends that no historic properties will be affected with respect to built environment resources.

4.2.2 Archaeological Resources

ESA encountered no archaeological sites or potential indicators of past cultural activity, such as burned soils, dense charcoal, or fire-modified rock, in 12 geoarchaeological borings conducted at the SRTC site in July 2021, nor were such materials observed in four geotechnical borings performed in October 2019. No stable buried surfaces were identified in the analyzed borings. This suggests that the project has a low likelihood of encountering *in situ* archaeological resources.

The Northern Pacific Railway and Puget Sound Electric Railway once ran once through the southern portion of the APE, but site preparations for current and former commercial buildings is likely to have disturbed or removed most historic period remains that may have been present. Based upon the results of the survey, ESA recommends that no historic properties will be affected with respect to archaeological resources. ESA recommends no additional archaeological work within the APE. Sound Transit should implement an IDP for use during project construction (Appendix C).

The findings and professional opinions included in this report are based on standard archaeological techniques including pedestrian survey and geoarchaeological borings; however, each has its limitations. It is possible that unanticipated cultural resource materials may be encountered during construction. If archaeological materials or human remains are encountered, the IDP describes steps to treat the discovery in compliance with 36 CFR 800.13, RCW 27.44.055, and RCW 68.60.055

5. REFERENCES CITED

Ames, Kenneth M., and Herbert G. Maschner

1999 *Peoples of the Northwest Coast: Their Archaeology and Prehistory*. Thames & Hudson, New York.

Anderson Map Company

1907 *Atlas of King County. Township 23 North Range 5 East*. Electronic resource, <http://www.historicmapworks.com/Map/US/1250017/Page+17+++Township+23+North++Range+5+East/King+County+1907/Washington/>, accessed April 10, 2020.

Artifacts Consulting

2011 Washington State Historic Property Inventory Form. DAHP Property ID 342991. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Berger, Margaret, and Glenn Hartmann

2007 Cultural Resources Assessment for the Rainier Avenue/Hardie Avenue Project: Rainier Avenue and Shattuck Avenue Railroad Bridge Replacement. Renton, King County. Washington. Prepared for Widener and Associates by Western Shore Heritage Service, Bainbridge Island, WA. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

2009 *Cultural Resources Assessment for the Rainier Avenue South Transit Improvement and Shattuck Avenue South Storm Drain Project, City of Renton, Washington*. Prepared for Widener & Associates by Western Shore Heritage Services, Inc. Bainbridge Island, WA. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Blukis Onat, Astrida R., Maury E. Morgenstein, Philippe D. LeTourneau, Robert P. Stone, Jerre Kosta, and Paula Johnson

2001 *Archaeological Investigations at stuwe'yuuq – Site 45KI464, Tolt River, King County, WA*. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Boeing

2020 History. Renton Production Facility. Electronic document; <https://www.boeing.com/company/about-bca/renton-production-facility.page>, accessed April 10, 2020.

Bowden, Bradley and Steven Dampf

2005 *Cultural Resources Discipline Report for I-405, Renton Nickel Improvement Project I-5 to SR 169, King County, Washington*. Prepared for Washington State Department of Transportation by HRA, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Bundy, Barbara

2008 *Interstate 405 Corridor Survey: Phase I, I-405, Interstate-5 to State Route 169 Improvement Project*. Prepared for Washington State Department of Transportation by Anchor QEA, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Carrillo, Yanora, Brandy Rinck, and Mike Cannon

- 2016 *Results of Cultural Resources Monitoring for the SW 7th Street/Naches Avenue SW Storm System Improvement Project-Phase 2, Renton, King County, Washington. SWCA Project No. 24076.* Prepared for The Louis Berger Group by SWCA Environmental Consultants, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Celmer, Gail

- 1995 *Cedar River Reconnaissance Survey.* On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Chatters, James C.

- 1981 *Archaeology of the Sbabadid Site 45KI51, King County, Washington.* On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Chrzastowski, M.J.

- 1983 *Historical changes to Lake Washington and route of the Lake Washington Ship Canal, King County, Washington.* U.S. Geological Survey Water-Resources Investigations Report 81-1182.

Davies, Ed, and Steve Ellis

- 2009 *Images of Aviation: Seattle's Commercial Aviation.* Arcadia Publishing, Charleston, Chicago, Portsmouth, and San Francisco.

Denton, A.P.

- 1914 Bond Issue No 7 State Road No 7 Survey 980B. Map No. 12-68/ Electronic document, <https://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=ZI51Yso3KcI1>, accessed August 16, 2021.
- 1915 Public Highway and Railroad Crossings Renton Junction Road Showing Grade Crossing with Northern Pacific Railway and Puget Sound Electric Railway. Map No. 333.18. Electronic document, <https://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=efmXtTsv8ZY1>, accessed August 16, 2021.

Department of Archaeology and Historic Preservation (DAHP)

- 2010 Statewide Predictive Model. Last updated 2010. Electronic document, <http://www.dahp.wa.gov/>, accessed April 10, 2020.
- 2020 Washington Information System for Architectural and Archaeological Records Data (WISAARD) database. Secure database, <http://www.dahp.wa.gov/>, accessed April 10, 2020.
- 2021 Washington Information System for Architectural and Archaeological Records Data (WISAARD) database. Secure database, <http://www.dahp.wa.gov/>, accessed April 4, 2021.

Franklin, Jerry F., and C. T. Dyrness

- 1988 *Natural Vegetation of Oregon and Washington.* Oregon State University Press, Corvallis.

Haerberlin, Hermann, and Erna Gunther

- 1930 *Indians of Puget Sound.* University of Washington Press, Seattle.

Hanley, John

- 1979 Washington State Archaeological Site Inventory Form: 45KI51. On file, Washington Department of Archaeology and Historic Preservation, Olympia.

Hilbert, Vi, Jay Miller, and Zalmai Zahir

- 2001 *Puget Sound Geography: Original Manuscript from T. T. Waterman*. Lushootseed Press, Federal Way, Washington.

Hudson, Lorelea

- 1996 Washington State Archaeological Site Inventory Form: 45KI538. On file, Washington Department of Archaeology and Historic Preservation, Olympia.

HWA Geosciences, Inc.

- 2002 *I-405 Bus Rapid Transit (BRT) and Bus Base North Project - Draft Conceptual Geotechnical Data Report - Parking Garages*. Prepared for Sound Transit, Seattle. On file, ESA, Seattle.\

Juell, Kenneth

- 2001 *Cultural Resources Inventory of the Proposed Washington Light Lanes Project*. Prepared for Universal Communication Networks – Washington, Inc. and David Evans & Associates, Inc. by Northwest Archaeological Associates, Inc. Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Kaehler, Gretchen

- 2007 *Archaeological Assessment of the Bob Bridge Toyota Expansion Project, Renton, King County, Washington*. Prepared for Markham Querhn Perkins Coie, LLP, by Historical Research Associates, Seattle. On file, Washington Department of Archaeology and Historic Preservation, Olympia.

Kauhi, Tonya C.

- 2013 *Statewide Predictive Model*. Prepared for the Department of Archaeology and Historic Preservation by GeoEngineers, Tacoma. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Kidd, Robert

- 1964 *A Synthesis of Western Washington Prehistory from the Perspective of Three Occupation Sites*. Unpublished Master's Thesis. Department of Anthropology University of Washington, Seattle.

King County Aerial Survey

- 1954 *Township 23 North, Range 5 East, Section 19*. Electronic document, <https://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=MSBTNy-knhk1>, accessed April 10, 2020.
- 1965 *Township 23 North, Range 5 East, Section 19*. Electronic document, https://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=bZILPuf0l_M1, accessed April 10, 2020.

King County Assessor

- 1937-1972a Historic Property Records for Parcel 192305-9035. On file, Washington State Archives, Puget Sound Regional Branch, Bellevue.

- 1937-1972b Historic Property Records for Parcel 334040-1630. On file, Washington State Archives, Puget Sound Regional Branch, Bellevue.
- 2019a Assessor's Data report for Parcel 334040-1630. Electronic document, <https://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=3340401630>, accessed December 6, 2019.
- 2019b Assessor's Data Report for Parcel 192305-9073. Electronic document, <https://blue.kingcounty.com/Assessor/eRealProperty/Dashboard.aspx?ParcelNbr=1923059073>, accessed December 6, 2019.
- Kopperl, Robert, Charles Hodges, Christian Miss, Johonna Shea, and Alecia Spooner
- 2016 *Archaeology of King County, Washington: A Context Statement for Native American Archaeological Resources*. Prepared for King County Historic Preservation Program by SWCA Environmental Consultants, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Kroll Map Company
- 1912 *Atlas of King County. Township 23 North Range 5 East*. Electronic document, <http://www.historicmapworks.com/Map/US/503561/Township+23+N+Range+5+E/King+County+1912/Washington/>, accessed April 10, 2020.
- 1926 *Atlas of King County. Township 23 North Range 5 East*. Electronic document, <http://www.historicmapworks.com/Map/US/1610886/Plate+017+++T++23+N+++R++5+E+++Renton++Seattle++Lake+Washington/King+County+1926/Washington/>, accessed April 10, 2020.
- Lane, Barbara
- 1972 *Anthropological Report on the Identity and Treaty Status of the Muckleshoot Indians*. Prepared for the U.S. Department of the Interior and the Muckleshoot Indian Tribe. On file, ESA, Seattle.
- 1975 *Identity, Treaty Status and Fisheries of the Duwamish Tribe of Indians*. Prepared for the U.S. Department of the Interior and the Snohomish Tribe of Indians. On file, ESA, Seattle.
- Lewarch, Dennis
- 1994a Washington State Archaeological Site Inventory Form: 45KI439. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- 1994b *Cultural Resources Field Assessment of the Fred Meyer Corporation Building Project Area, Renton, King County, Washington*. Prepared for Fred Meyer Corporation by Larson Anthropological Archaeological Services, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Lewarch, Dennis, Eric Bangs, and Lynn Larson
- 1996 *Cultural Resources Assessment of the Schneider Homes Renton Apartments Project, Renton, King County, Washington*. Prepared for Schneider Homes, Inc. by Larson Anthropological Archaeological Services, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Lockwood, Chris
- 2021 *South Renton Transit Center Project, King County, Washington, Archaeological Borings Work Plan*. Prepared for Sound Transit by ESA, Seattle. On file, ESA, Seattle.

- Lockwood, Chris, Chanda R. Schneider, Amber Grady, and Johanna Khan
2020 *I-405 BRT Historic and Archaeological Resources Technical Memorandum*. Prepared for WSP and Sound Transit by ESA, Seattle. On file, ESA, Seattle.
- Lorenz, Laura
1980 *Historical Sketch of the Greater Maple Valley Area*. Greater Maple Valley Historical Society. Dotson Printing, Maple Valley, Washington.
- Matson, R. G., and Gary Coupland
1995 *The Prehistory of the Northwest Coast*. Academic Press, San Diego.
- Mead & Hunt
2018 DRAFT Renton Municipal Airport Master Plan, Chapter A. Electronic document; https://rentonwa.gov/city_hall/public_works/transportation_systems/renton_municipal_airport/master_plan, accessed April 10, 2020.
- Metsker Map Company
1936 *Atlas of King County. Township 23 North Range 5 East*. Electronic document, <http://www.historicmapworks.com/Map/US/1260032/Township+23+N+++Range+5+E+++Renton++Lake+Washington++Elliott/King+County+1936/Washington/>, accessed April 10, 2020.
- Metz, Micca and Jason Cooper
2014 *Cultural Resources Assessment for the Renton Center Senior Living Project in King County, Washington*. Prepared for CG Engineering by AMEC, Bothell, Washington. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Miller, Jay
2014 *Elders Dialog: Ed Davis and Vi Hilbert Discuss Native Puget Sound Language, Culture, and Heritage*. Lushootseed Press, Federal Way, Washington.
- Miller, Jay, and Astrida R. Blukis Onat
2004 *Winds, Waterways, and Weirs: Ethnographic Study of the Central Link Light Rail Corridor*. Prepared for Sound Transit, Central Link Light Rail, by BOAS, Inc., Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Monahan, Tom
2009 A River Ran Through It: The Great Renton Flood of 1911. *Renton Historical Society & Museum Quarterly* 40(4).
- Mullineaux, D.E.
1970 *Geology of the Renton, Auburn, and Black Diamond quadrangles, King County, Washington*. U.S. Geological Survey Professional Paper 672. USGS, Reston, Virginia.
- National Park Service
1997 *How to Apply the National Register Criteria for Evaluation*. National Register Bulletin No. 15, U.S. Department of Interior, National Park Service Cultural Resources. Government Printing Office, Washington, D.C.

Nelson, Charles M.

- 1990 Prehistory of the Puget Sound Region in Northwest Coast. In *Northwest Coast*, edited by Wayne Suttles, pp. 481-484. Handbook of North American Indians, William C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

NetrOnline

- 2020 Historic Aerial Viewer: 1936, 1940, 1964, 1968, 1969, 1980, 1990, 2002. Electronic document, <https://www.historicaerials.com/viewer>, accessed April 10, 2020.

Ott, Jennifer

- 2012 “Due to construction of Lake Washington Ship Canal, Lake Washington is lowered 9 feet beginning on August 28, 1916, and the Black River Disappears”. Electronic document, <https://www.historylink.org/File/686>, accessed April 10, 2020.

Pacific Aerial Survey

- 1937 *Aerial Photograph, Township 23 North, Range 5 East, Section 19*. Electronic document, <https://info.kingcounty.gov/transportation/kcdot/roads/mapandrecordscenter/mapvault/Default.aspx?DocId=u4FForR3tTM1> accessed April 10, 2020.

Palmer, S.P.

- 1992 *Preliminary Maps of Liquefaction Susceptibility for the Renton and Auburn 7.5' Quadrangles, Washington*. Open File Report 92-7. Washington Division of Geology and Earth Sciences, Olympia.

Polk, R.L.

- 1940 *Seattle City Directory*. R.L. Polk & Company, Seattle.
1954 *Renton City Directory*. R.L. Polk & Company, Seattle.

Robertson, Donald B.

- 1995 *Encyclopedia of Western Railroad History: Oregon, Washington, vol. III*. The Caxton Printers, Caldwell, Idaho.

Rooke, Lara C.

- 2010 *Cultural Resources Discipline Report for the Burien to Renton RapidRide Project- F Line, NEPA Documented Categorical Exclusion; Final Historical, Archaeological and Cultural Resources Discipline Report, King County, Washington*. Prepared for King County Metro Transit, by AMEC, Bothell. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- 2012 *Cultural Resources Discipline Report for the RapidRide-F Line, NEPA Documented Categorical Exclusion Project- Addendum: Historical, Archaeological, and Cultural Resources Discipline Report- Addendum*. Prepared for King County Metro Transit by AMEC, Bothell. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.

Samson, Sarah

- 2014 Early Empire: The Story of the Smithers Family. *Renton Historical Society & Museum Quarterly* 45(1).

- Schneider, Chanda, Chris Lockwood, Johanna Kahn, and Alex Stevenson (Sound Transit)
 2021 *South Renton Transit Center Site Building Demolition Project, King County, Washington – Historic Resources Inventory and Evaluation*. Prepared for Sound Transit, Seattle, by ESA, Seattle. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Seattle Daily Times*
 1968 “Largest Agency to be at Renton” 17 March:112. Seattle.
- Slauson, Morda C.
 1976 *Renton – From Coal to Jets*. Renton Historical Society, Renton, Washington.
- Smith, Craig and Robin Hoffman
 2007 *Cultural Resources Inventory of the Columbia Bank Parcel, King County, Washington*. Prepared for Zenczak & Partners by ENTRIX, Inc. Seattle, WA. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Smith, Marian W.
 1940 *The Puyallup-Nisqually*. Columbia University Contributions to Anthropology No. 32. Columbia University Press, New York.
- Smith, Timothy, Stephen Emerson, Stan Gough, And Rebecca Stevens
 2014 *Cultural Resources Survey for the Washington State Department of Transportation’s I-405/SR 167 Direct Connector Project, King County, Washington*. Prepared for Washington State Department of Transportation by Archaeological and Historical Service Eastern Washington University, Cheney, WA. On file, Washington State Department of Archaeology and Historic Preservation, Olympia.
- Spier, Leslie
 1936 *Tribal Distribution in Washington*. American Anthropological Association General Series in Anthropology No. 3. George Banta, Menasha, Wisconsin.
- Stewart, Elizabeth P.
 2012 The Flight of a Lifetime. *Renton Historical Society & Museum Quarterly* 43(3).
- Suttles, Wayne, and Barbara Lane
 1990 Southern Coast Salish. In *Northwest Coast*, edited by Wayne Suttles, pp. 485-502. Handbook of North American Indians, Vol. 7, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.
- Swanton, John R.
 1979 *Indian Tribes of Washington, Oregon, and Idaho*. Reprinted. Ye Galleon Press, Fairfield, WA. Originally published 1952, Bureau of American Ethnology, Bulletin No. 145. Smithsonian Institution Press, Washington, D.C.
- U.S. Army Corps of Engineers
 1997 Cedar River Section 205 Flood Damage Reduction Study. Final Environmental Impact Statement. On file, ESA, Seattle.

U.S. Bureau of Indian Affairs

- 2020 Office of Federal Acknowledgement - Petitioner #025: Duwamish Indian Tribe, Washington. Electronic document, <https://www.bia.gov/as-ia/ofa/025-duwami-wa>, accessed April 10, 2020.

U.S. Bureau of Land Management

- 1997 Township 23 North, Range 5 East Master Title Plat. Electronic document, https://www.blm.gov/or/landrecords/survey/yPlatView1_2.php?path=PWA&name=230n050em01.jpg, accessed April 10, 2020.

U.S. Geological Survey (USGS)

- 1897 *Tacoma, WA. 30' Series Quadrangle.* U.S. Geological Survey, Reston Virginia.
 1900 *Tacoma, WA. 30' Series Quadrangle.* U.S. Geological Survey, Reston Virginia.
 1911 *Tacoma, WA. 30' Series Quadrangle.* U.S. Geological Survey, Reston Virginia.
 1956 *Renton, WA. 7.5' Series Quadrangle.* U.S. Geological Survey, Reston Virginia.
 1969 *Renton, WA. 7.5' Series Quadrangle.* U.S. Geological Survey, Reston Virginia.
 1976 *Renton, WA. 7.5' Series Quadrangle.* U.S. Geological Survey, Reston Virginia.

U.S. Surveyor General

- 1865 Township 27 North, Range 4 East Survey Map. Electronic document, https://www.blm.gov/or/landrecords/survey/yPlatView1_2.php?path=PWA&name=t230n050e_001.jpg, accessed April 10, 2020.

Valentino, Alicia

- 2017 *Contract No. D120673, Work Order 84 – Renton Properties Historic Property Evaluations (DAHP #2017-11-07927 ESA).* Prepared for Sound Transit, Seattle, by ESA, Seattle. On file, ESA, Seattle.

Washington State Department of Transportation (WSDOT)

- 2020 Railroad Viewer. Electronic document, <https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=bf6946236eac4d03a6e789559e66061a>, accessed April 10, 2020.

Williams, David B.

- 2015 *Too High and Too Steep: Reshaping Seattle's Topography.* University of Washington Press, Seattle.

Wing, Warren W.

- 1995 *To Tacoma by Trolley: The Puget Sound Electric Railway.* Pacific Fast Mail, Edmonds, Washington.

Appendix A

Regulatory Correspondence

**Section 106 Correspondence
DAHP Project 2022-03-01259**



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

January 14, 2022

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

**Subject: Sound Transit
South Renton Transit Center Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Project (Project). The Project would construct a new transit center and parking structure in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation with the Washington State Historic Preservation Officer (SHPO), and requests feedback on the proposed Area of Potential Effects (APE).

The Project is located in Section 19 of Township 23 North, Range 05 East, in King County, Washington, as shown on the enclosed Figures 1 and 2. The Project site includes four parcels along South Grady Way and Rainier Avenue South (i.e., 192305-9035, 192305-9063, 192305-9068, and 192305-9074). Figure 3 shows the Project components. The Project would construct a five-story (approximately 752-stall) parking garage, transit center island with bus bays, bus layover spaces, access driveways, and nearby roadway and infrastructure improvements.

The proposed APE for the Project is shown on Figures 1 and 2. The APE encompasses improvements at the Project site and associated roadway improvements, plus the adjacent tax parcel or 200 feet, whichever is less. Ground disturbing activities would be limited to the Project site, and associated road rights-of-way. Project elements that are anticipated to result in ground

January 14, 2022

Page 2

disturbance during construction include the transit center island, the parking garage, utility relocation and installation, revised traffic signals and improvements, road and sidewalk revisions, and improved pedestrian and bicycle access improvements. It is anticipated that temporary construction staging would occur at the Project site. The potential maximum depth of ground disturbance is estimated to be approximately 20 feet for new or relocated traffic signals, approximately 30 feet for the parking garage foundation, and approximately 6 to 8 feet for utility trenching or other infrastructure installation such as light or camera poles at the Project site.

Following the APE review period, a cultural resources study of the APE will be conducted so that FTA can assess the potential for Project effects to historic properties located within the APE. The proposed methodology for this cultural resources study is included in Attachment A. At the conclusion of these investigations, the Project team will prepare a report that documents the results of the cultural resources study.

FTA will contact the following tribes to notify them of the undertaking, initiate Section 106 consultation, and request their comments: Confederated Tribes and Bands of the Yakama Nation; Muckleshoot Indian Tribe; Puyallup Tribe of the Puyallup Reservation; Snoqualmie Indian Tribe; Suquamish Indian Tribe of the Port Madison Reservation; and Tulalip Tribes of Washington. FTA looks forward to responding to any concerns these tribes may identify and will notify you of any such concerns.

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and cultural resources study methodology within 30 days of receipt of this letter. FTA also welcomes any assistance you can provide in identifying historic properties, including Traditional Cultural Properties, that may exist within the APE. Should you require additional information or have questions, please contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Lesley Maurer, Environmental Planner, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Figure 1. South Renton Transit Center Project Area of Potential Effects on Topographic Map
Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial Photograph

Figure 3. Transit Center Conceptual Design Details
Attachment A. South Renton Transit Center Project, Cultural Resources Study
Methodology, January 2022



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

January 14, 2022

The Honorable Jaison Elkins
Chairman
Muckleshoot Indian Tribe
39015 - 172nd Avenue SE
Auburn, WA 98092

**Subject: Sound Transit
South Renton Transit Center Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Project (Project). The Project would construct a new transit center and parking structure in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation for the Project, and requests feedback on the proposed Area of Potential Effects (APE).

The Project is located in Section 19 of Township 23 North, Range 05 East, in King County, Washington, as shown on the enclosed Figures 1 and 2. The Project site includes four parcels along South Grady Way and Rainier Avenue South (i.e., 192305-9035, 192305-9063, 192305-9068, and 192305-9074). Figure 3 shows the Project components. The Project would construct a five-story (approximately 752-stall) parking garage, transit center island with bus bays, bus layover spaces, access driveways, and nearby roadway and infrastructure improvements.

The proposed APE for the Project is shown on Figures 1 and 2. The APE encompasses improvements at the Project site and associated roadway improvements, plus the adjacent tax parcel or 200 feet, whichever is less. Ground disturbing activities would be limited to the Project site, and associated road rights-of-way. Project elements that are anticipated to result in ground

January 14, 2022

Page 2

disturbance during construction include the transit center island, the parking garage, utility relocation and installation, revised traffic signals and improvements, road and sidewalk revisions, and improved pedestrian and bicycle access improvements. It is anticipated that temporary construction staging would occur at the Project site. The potential maximum depth of ground disturbance is estimated to be approximately 20 feet for new or relocated traffic signals, approximately 30 feet for the parking garage foundation, and approximately 6 to 8 feet for utility trenching or other infrastructure installation such as light or camera poles at the Project site.

Following the APE review period, a cultural resources study of the APE will be conducted so that FTA can assess the potential for Project effects to historic properties located within the APE. The proposed methodology for this cultural resources study is included in Attachment A. At the conclusion of these investigations, the Project team will prepare a report that documents the results of the cultural resources study.

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and cultural resources study methodology within 30 days of receipt of this letter. FTA also welcomes any assistance you can provide in identifying historic properties, including Traditional Cultural Properties, that may exist within the APE. Should you require additional information or have questions, please contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Madrienne White, Public and Government Relations Manager, Muckleshoot Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Lesley Maurer, Environmental Planner, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Figure 1. South Renton Transit Center Project Area of Potential Effects on
Topographic Map
Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial
Photograph
Figure 3. Transit Center Conceptual Design Details
Attachment A. South Renton Transit Center Project, Cultural Resources Study
Methodology, January 2022



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

January 14, 2022

The Honorable Bill Sterud
Chairman
Puyallup Tribe of the Puyallup Reservation
3009 East Portland Avenue
Tacoma, WA 98404

**Subject: Sound Transit
South Renton Transit Center Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Sterud:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Project (Project). The Project would construct a new transit center and parking structure in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation for the Project, and requests feedback on the proposed Area of Potential Effects (APE).

The Project is located in Section 19 of Township 23 North, Range 05 East, in King County, Washington, as shown on the enclosed Figures 1 and 2. The Project site includes four parcels along South Grady Way and Rainier Avenue South (i.e., 192305-9035, 192305-9063, 192305-9068, and 192305-9074). Figure 3 shows the Project components. The Project would construct a five-story (approximately 752-stall) parking garage, transit center island with bus bays, bus layover spaces, access driveways, and nearby roadway and infrastructure improvements.

The proposed APE for the Project is shown on Figures 1 and 2. The APE encompasses improvements at the Project site and associated roadway improvements, plus the adjacent tax parcel or 200 feet, whichever is less. Ground disturbing activities would be limited to the Project site, and associated road rights-of-way. Project elements that are anticipated to result in ground

January 14, 2022

Page 2

disturbance during construction include the transit center island, the parking garage, utility relocation and installation, revised traffic signals and improvements, road and sidewalk revisions, and improved pedestrian and bicycle access improvements. It is anticipated that temporary construction staging would occur at the Project site. The potential maximum depth of ground disturbance is estimated to be approximately 20 feet for new or relocated traffic signals, approximately 30 feet for the parking garage foundation, and approximately 6 to 8 feet for utility trenching or other infrastructure installation such as light or camera poles at the Project site.

Following the APE review period, a cultural resources study of the APE will be conducted so that FTA can assess the potential for Project effects to historic properties located within the APE. The proposed methodology for this cultural resources study is included in Attachment A. At the conclusion of these investigations, the Project team will prepare a report that documents the results of the cultural resources study.

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and cultural resources study methodology within 30 days of receipt of this letter. FTA also welcomes any assistance you can provide in identifying historic properties, including Traditional Cultural Properties, that may exist within the APE. Should you require additional information or have questions, please contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Brandon Reynon, Cultural Resources, Puyallup Tribe of the Puyallup Reservation
Jennifer Keating, Land Use Planner, Puyallup Tribe of the Puyallup Reservation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Lesley Maurer, Environmental Planner, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Figure 1. South Renton Transit Center Project Area of Potential Effects on
Topographic Map
Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial
Photograph
Figure 3. Transit Center Conceptual Design Details
Attachment A. South Renton Transit Center Project, Cultural Resources Study
Methodology, January 2022



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

January 14, 2022

The Honorable Robert de los Angeles
Chairman
Snoqualmie Indian Tribe
P.O. Box 969
Snoqualmie, WA 98065

**Subject: Sound Transit
South Renton Transit Center Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman de los Angeles:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Project (Project). The Project would construct a new transit center and parking structure in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation for the Project, and requests feedback on the proposed Area of Potential Effects (APE).

The Project is located in Section 19 of Township 23 North, Range 05 East, in King County, Washington, as shown on the enclosed Figures 1 and 2. The Project site includes four parcels along South Grady Way and Rainier Avenue South (i.e., 192305-9035, 192305-9063, 192305-9068, and 192305-9074). Figure 3 shows the Project components. The Project would construct a five-story (approximately 752-stall) parking garage, transit center island with bus bays, bus layover spaces, access driveways, and nearby roadway and infrastructure improvements.

The proposed APE for the Project is shown on Figures 1 and 2. The APE encompasses improvements at the Project site and associated roadway improvements, plus the adjacent tax parcel or 200 feet, whichever is less. Ground disturbing activities would be limited to the Project site, and associated road rights-of-way. Project elements that are anticipated to result in ground

January 14, 2022

Page 2

disturbance during construction include the transit center island, the parking garage, utility relocation and installation, revised traffic signals and improvements, road and sidewalk revisions, and improved pedestrian and bicycle access improvements. It is anticipated that temporary construction staging would occur at the Project site. The potential maximum depth of ground disturbance is estimated to be approximately 20 feet for new or relocated traffic signals, approximately 30 feet for the parking garage foundation, and approximately 6 to 8 feet for utility trenching or other infrastructure installation such as light or camera poles at the Project site.

Following the APE review period, a cultural resources study of the APE will be conducted so that FTA can assess the potential for Project effects to historic properties located within the APE. The proposed methodology for this cultural resources study is included in Attachment A. At the conclusion of these investigations, the Project team will prepare a report that documents the results of the cultural resources study.

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and cultural resources study methodology within 30 days of receipt of this letter. FTA also welcomes any assistance you can provide in identifying historic properties, including Traditional Cultural Properties, that may exist within the APE. Should you require additional information or have questions, please contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Steven Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Lesley Maurer, Environmental Planner, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Figure 1. South Renton Transit Center Project Area of Potential Effects on
Topographic Map
Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial
Photograph
Figure 3. Transit Center Conceptual Design Details
Attachment A. South Renton Transit Center Project, Cultural Resources Study
Methodology, January 2022



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

January 14, 2022

The Honorable Leonard Forsman
Chairman
Suquamish Indian Tribe of the Port Madison Reservation
P.O. Box 498
Suquamish, WA 98392-0498

**Subject: Sound Transit
South Renton Transit Center Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Project (Project). The Project would construct a new transit center and parking structure in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation for the Project, and requests feedback on the proposed Area of Potential Effects (APE).

The Project is located in Section 19 of Township 23 North, Range 05 East, in King County, Washington, as shown on the enclosed Figures 1 and 2. The Project site includes four parcels along South Grady Way and Rainier Avenue South (i.e., 192305-9035, 192305-9063, 192305-9068, and 192305-9074). Figure 3 shows the Project components. The Project would construct a five-story (approximately 752-stall) parking garage, transit center island with bus bays, bus layover spaces, access driveways, and nearby roadway and infrastructure improvements.

The proposed APE for the Project is shown on Figures 1 and 2. The APE encompasses improvements at the Project site and associated roadway improvements, plus the adjacent tax parcel or 200 feet, whichever is less. Ground disturbing activities would be limited to the Project site, and associated road rights-of-way. Project elements that are anticipated to result in ground

January 14, 2022

Page 2

disturbance during construction include the transit center island, the parking garage, utility relocation and installation, revised traffic signals and improvements, road and sidewalk revisions, and improved pedestrian and bicycle access improvements. It is anticipated that temporary construction staging would occur at the Project site. The potential maximum depth of ground disturbance is estimated to be approximately 20 feet for new or relocated traffic signals, approximately 30 feet for the parking garage foundation, and approximately 6 to 8 feet for utility trenching or other infrastructure installation such as light or camera poles at the Project site.

Following the APE review period, a cultural resources study of the APE will be conducted so that FTA can assess the potential for Project effects to historic properties located within the APE. The proposed methodology for this cultural resources study is included in Attachment A. At the conclusion of these investigations, the Project team will prepare a report that documents the results of the cultural resources study.

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and cultural resources study methodology within 30 days of receipt of this letter. FTA also welcomes any assistance you can provide in identifying historic properties, including Traditional Cultural Properties, that may exist within the APE. Should you require additional information or have questions, please contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Dennis Lewarch, Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port
Madison Reservation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Lesley Maurer, Environmental Planner, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Figure 1. South Renton Transit Center Project Area of Potential Effects on
Topographic Map
Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial
Photograph
Figure 3. Transit Center Conceptual Design Details
Attachment A. South Renton Transit Center Project, Cultural Resources Study
Methodology, January 2022



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

January 14, 2022

The Honorable Teri Gobin
Chairwoman
Tulalip Tribes of Washington
6406 Marine Drive
Tulalip, WA 98271

**Subject: Sound Transit
South Renton Transit Center Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairwoman Gobin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Project (Project). The Project would construct a new transit center and parking structure in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation for the Project, and requests feedback on the proposed Area of Potential Effects (APE).

The Project is located in Section 19 of Township 23 North, Range 05 East, in King County, Washington, as shown on the enclosed Figures 1 and 2. The Project site includes four parcels along South Grady Way and Rainier Avenue South (i.e., 192305-9035, 192305-9063, 192305-9068, and 192305-9074). Figure 3 shows the Project components. The Project would construct a five-story (approximately 752-stall) parking garage, transit center island with bus bays, bus layover spaces, access driveways, and nearby roadway and infrastructure improvements.

The proposed APE for the Project is shown on Figures 1 and 2. The APE encompasses improvements at the Project site and associated roadway improvements, plus the adjacent tax parcel or 200 feet, whichever is less. Ground disturbing activities would be limited to the Project site, and associated road rights-of-way. Project elements that are anticipated to result in ground

January 14, 2022

Page 2

disturbance during construction include the transit center island, the parking garage, utility relocation and installation, revised traffic signals and improvements, road and sidewalk revisions, and improved pedestrian and bicycle access improvements. It is anticipated that temporary construction staging would occur at the Project site. The potential maximum depth of ground disturbance is estimated to be approximately 20 feet for new or relocated traffic signals, approximately 30 feet for the parking garage foundation, and approximately 6 to 8 feet for utility trenching or other infrastructure installation such as light or camera poles at the Project site.

Following the APE review period, a cultural resources study of the APE will be conducted so that FTA can assess the potential for Project effects to historic properties located within the APE. The proposed methodology for this cultural resources study is included in Attachment A. At the conclusion of these investigations, the Project team will prepare a report that documents the results of the cultural resources study.

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and cultural resources study methodology within 30 days of receipt of this letter. FTA also welcomes any assistance you can provide in identifying historic properties, including Traditional Cultural Properties, that may exist within the APE. Should you require additional information or have questions, please contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve,
Tulalip Tribes of Washington
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Lesley Maurer, Environmental Planner, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Figure 1. South Renton Transit Center Project Area of Potential Effects on
Topographic Map
Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial
Photograph
Figure 3. Transit Center Conceptual Design Details
Attachment A. South Renton Transit Center Project, Cultural Resources Study
Methodology, January 2022



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

January 14, 2022

The Honorable Delano Saluskin
Chairman
Confederated Tribes and Bands of the Yakama Nation
P.O. Box 151
Toppenish, WA 98948

**Subject: Sound Transit
South Renton Transit Center Project
National Historic Preservation Act, Section 106
Consultation Initiation**

Dear Chairman Saluskin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Project (Project). The Project would construct a new transit center and parking structure in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation for the Project, and requests feedback on the proposed Area of Potential Effects (APE).

The Project is located in Section 19 of Township 23 North, Range 05 East, in King County, Washington, as shown on the enclosed Figures 1 and 2. The Project site includes four parcels along South Grady Way and Rainier Avenue South (i.e., 192305-9035, 192305-9063, 192305-9068, and 192305-9074). Figure 3 shows the Project components. The Project would construct a five-story (approximately 752-stall) parking garage, transit center island with bus bays, bus layover spaces, access driveways, and nearby roadway and infrastructure improvements.

The proposed APE for the Project is shown on Figures 1 and 2. The APE encompasses improvements at the Project site and associated roadway improvements, plus the adjacent tax parcel or 200 feet, whichever is less. Ground disturbing activities would be limited to the Project site, and associated road rights-of-way. Project elements that are anticipated to result in ground

January 14, 2022

Page 2

disturbance during construction include the transit center island, the parking garage, utility relocation and installation, revised traffic signals and improvements, road and sidewalk revisions, and improved pedestrian and bicycle access improvements. It is anticipated that temporary construction staging would occur at the Project site. The potential maximum depth of ground disturbance is estimated to be approximately 20 feet for new or relocated traffic signals, approximately 30 feet for the parking garage foundation, and approximately 6 to 8 feet for utility trenching or other infrastructure installation such as light or camera poles at the Project site.

Following the APE review period, a cultural resources study of the APE will be conducted so that FTA can assess the potential for Project effects to historic properties located within the APE. The proposed methodology for this cultural resources study is included in Attachment A. At the conclusion of these investigations, the Project team will prepare a report that documents the results of the cultural resources study.

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and cultural resources study methodology within 30 days of receipt of this letter. FTA also welcomes any assistance you can provide in identifying historic properties, including Traditional Cultural Properties, that may exist within the APE. Should you require additional information or have questions, please contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Kate Valdez, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Lesley Maurer, Environmental Planner, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Figure 1. South Renton Transit Center Project Area of Potential Effects on Topographic Map
Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial Photograph
Figure 3. Transit Center Conceptual Design Details
Attachment A. South Renton Transit Center Project, Cultural Resources Study Methodology, January 2022

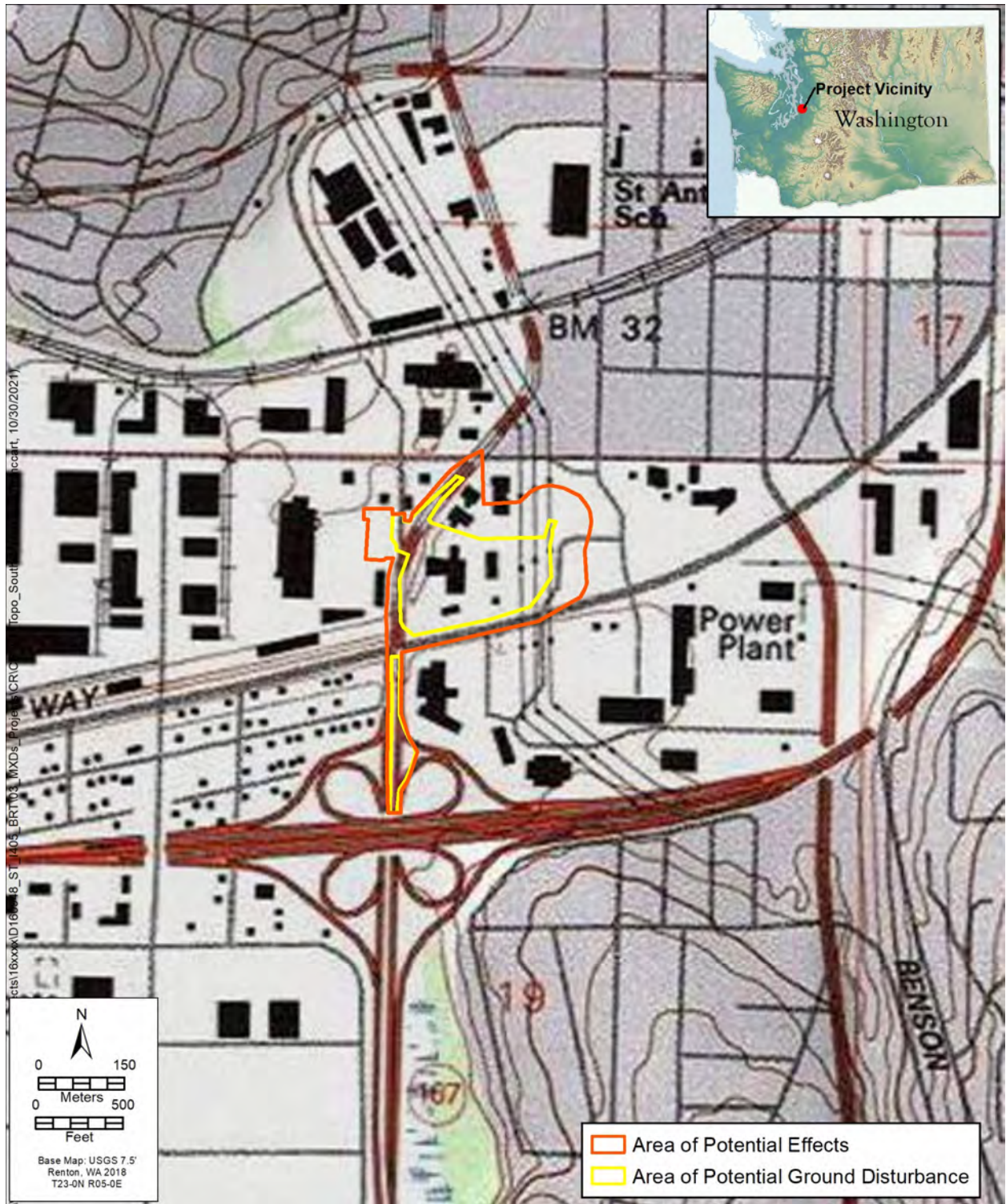


Figure 1. South Renton Transit Center Project Area of Potential Effects on Topographic Map

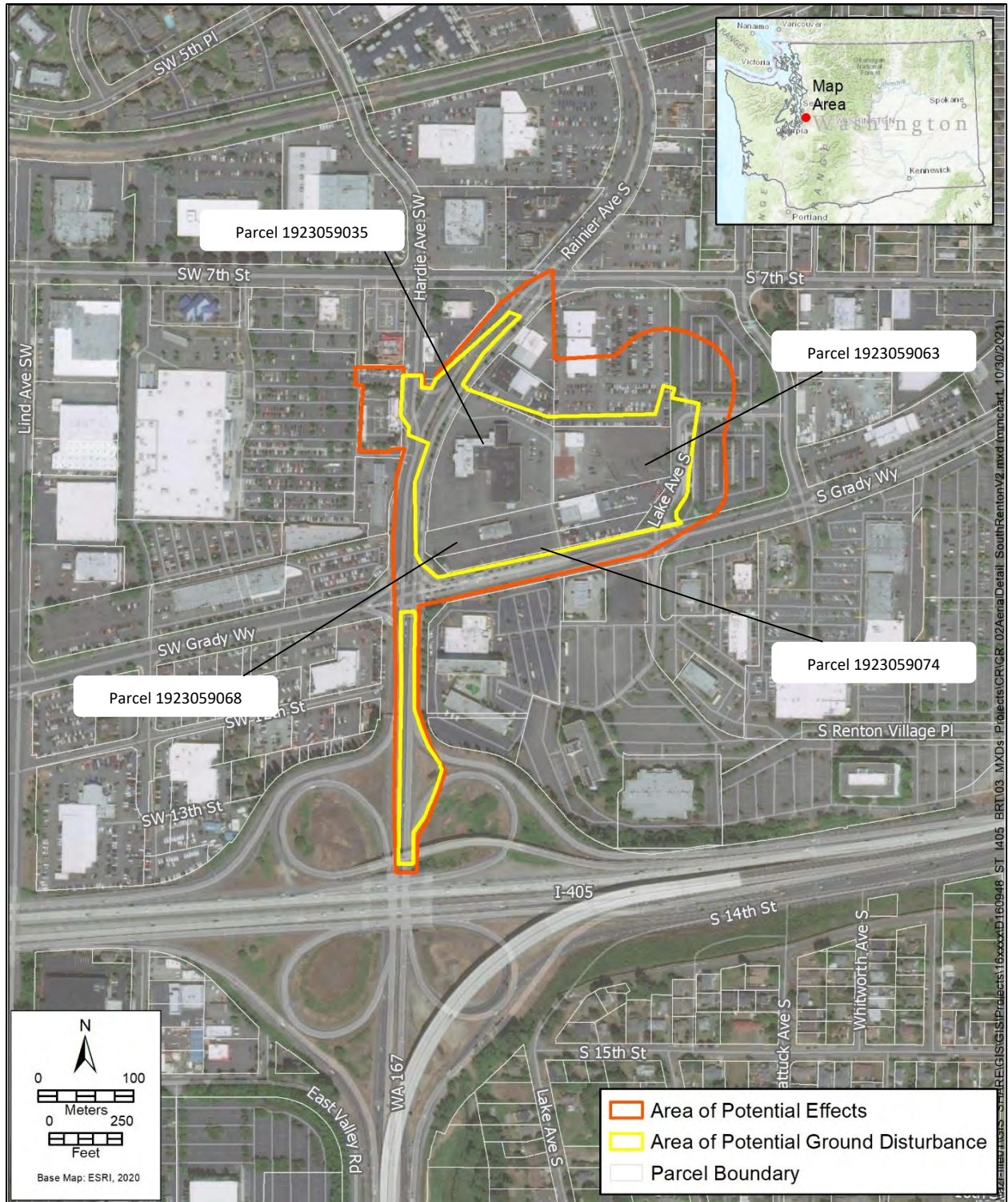


Figure 2. South Renton Transit Center Project Area of Potential Effects on Aerial Photograph

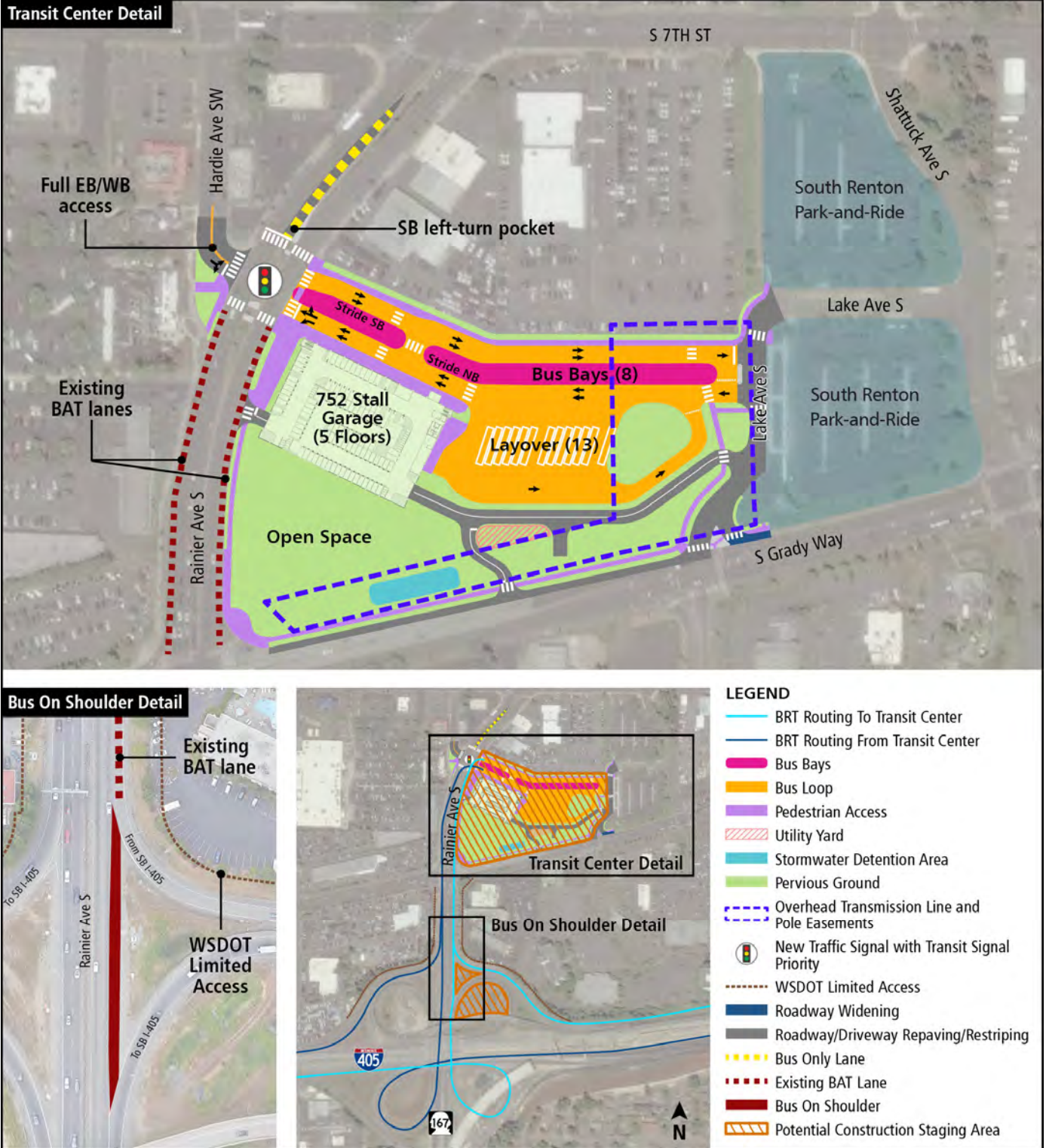


Figure 3. Transit Center Conceptual Design Details

Attachment A
South Renton Transit Center Project
Cultural Resources Study Methodology
January 2022

Cultural resources inventory and investigations will be used to inform National Register of Historic Places (NRHP) eligibility and effects determinations for the South Renton Transit Center Project (Project). Results of previous studies conducted at the Project location (described below) will be integrated into a single cultural resources technical report to support these determinations for the Project.

Archaeological Resources Inventory and Investigations

- **South Renton Transit Center Early Boring and Design Investigations Project** (SHPO Project Tracking Code 2020-12-07493).

This investigations project included geotechnical, geoarchaeological, and environmental site assessment borings and other subsurface design investigations within the Project Area of Potential Effects (APE). On May 20, 2021, FTA determined that the South Renton Transit Center Early Boring and Design Investigations Project would result in no historic properties affected, and the Washington State Historic Preservation Officer (SHPO) concurred with this determination on May 25, 2021. Following that determination and concurrence, a total of 12 geoarchaeological borings were drilled in October 2021. Borings were located across the portion of the Project APE where substantial ground disturbance is anticipated. These borings were 2-inch diameter, sleeved, direct-push geoprobes that sampled sediment continuously to a target depth of 50 feet. These samples from the borings were analyzed by a Secretary of the Interior (SOI) qualified archaeologist in the field. If soil with high archaeological potential was identified, soils were then screened through 1/4-inch hardware mesh to determine if archaeological materials were present. Additionally, geotechnical investigations, environmental site assessment borings, and infiltration pit excavation, were also conducted. Boring logs and other notes for these additional activities were reviewed by an archaeologist to assess the potential for archaeological materials at the Project site.

Built Environment Inventory and NRHP Eligibility Evaluation

- **South Renton Transit Center Site Building Demolition Project** (SHPO Project Tracking Code 2021-07-04474). In July 2021, Sound Transit conducted a survey and inventory of historic built environment resources located on the Project site within King County parcels 192305-9053, 192305-9035, and 192305-9063, as part of an evaluation conducted under the Washington State Environmental Policy Act (SEPA). The SEPA review evaluated potential impacts of building demolition in response to vandalism and public safety concerns at the properties. A total of three buildings were evaluated for NRHP eligibility (Property IDs 343450, 713412, 713411). On July 19, 2021, Sound Transit recommended that none of these buildings were eligible for the NRHP, and SHPO concurred with these recommendations on July 22, 2021. These buildings are currently in the process of being demolished.
- **Other Historic Properties.** One additional historic age building (Property ID 342958) is located within the Project APE. This building was determined not eligible for the NRHP in 2013. No other built environment resources requiring inventory and evaluation are included within the Project APE.

**Area of Potential Effects
Concurrence**



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

March 2, 2022

Ms. Linda Gehrke
Regional Administrator
Federal Transit Administration
915 Second Avenue
Suite 3142
Seattle, WA. 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2022-03-01259
Property: Sound Transit_ South Renton Transit Center Project
Re: APE Concur

Dear Ms. Gehrke:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the area of potential effect (APE).

We concur with your definition of the APE and proposed inventory methodology. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov



Determination of Effects Concurrence



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

April 18, 2022

Mrs. Linda Gehrke
Regional Administrator
Federal Transit Administration
915 Second Avenue
Suite 3142
Seattle, WA. 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2022-03-01259
Property: Sound Transit_ South Renton Transit Center Project
Re: No Historic Properties Affected

Dear Mrs. Gehrke:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP) and providing a copy of the cultural resources survey report for the above referenced project. As a result of our review, we concur with the recommendations made in the report and your finding of No Historic Properties Affected. As a result of our concurrence, further contact with DAHP on this matter is not necessary.

However, if information becomes available and/or the scope of work changes, please resume consultation with DAHP and all consulting parties. In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and contact made with concerned tribes and DAHP for further consultation.

We appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

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

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov



**SEPA Correspondence
DAHP Project 2021-07-04474**

Stevenson, Alex

From: Borth, Holly (DAHP) <holly.borth@dahp.wa.gov>
Sent: Wednesday, July 28, 2021 9:48 AM
To: Stevenson, Alex; Wardlaw, Dennis
Cc: Fendt, Kathy; Schneider, Chandra
Subject: RE: 2021-07-04474 Report and HPIs submitted on WISAARD
Attachments: 2021-07-04474_072821.pdf

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hi Alex,

Please see the attached and let me know if you have any questions.

Best,
Holly

Holly Borth, M.S. | Built Environment Compliance Reviewer
360.890.0174 (c) | holly.borth@dahp.wa.gov
[she/her/hers]

Department of Archaeology & Historic Preservation | www.dahp.wa.gov
1110 Capitol Way S, Suite 30 | Olympia WA 98501
PO Box 48343 | Olympia WA 98504-8343

 please consider the environment before printing this email

My weekly hours are 7am – 3pm, Mon-Fri
Like [DAHP on Facebook!](#)

DAHP staff are working remotely until further notice. My hours are 7 am - 3 pm Monday - Friday. Staff no longer have land lines. For a directory of staff cell phone numbers please see our [website](#).

From: Stevenson, Alex <alex.stevenson@soundtransit.org>
Sent: Monday, July 19, 2021 3:57 PM
To: Wardlaw, Dennis (DAHP) <dennis.wardlaw@dahp.wa.gov>
Cc: Borth, Holly (DAHP) <holly.borth@dahp.wa.gov>; Fendt, Kathy <kathy.fendt@soundtransit.org>; Schneider, Chandra <cschneider@esassoc.com>
Subject: 2021-07-04474 Report and HPIs submitted on WISAARD

External Email

Good afternoon Dennis –

Our consultant, ESA, just submitted a technical report and associated HPIs for project 2021-07-04474 (South Renton Transit Center Site Building Demolition Project). This is the project I emailed you about previously with the federal terminology. In coordination with the Federal Transit Administration (FTA), it has been changed to a SEPA-only project that we are moving forward with under Sound Transit's SEPA authority. This project is specifically limited to demolition of up to 3 buildings on the future South Renton Transit Center (SRTC) site. In coordination with the City of Renton, Sound Transit has determined that these buildings urgently need to be taken down (to foundational slab, with no subsurface work) for human health and safety reasons.

There have been/will be three related DAHP projects on the same site.

1. Project 2021-05-02930 was a federal undertaking that has been through an FTA Section 106 process already, through which DAHP concurred with a determination of no historic properties affected (see attached email). This project is early site investigations for design of the proposed SRTC on this site, as well as for cultural resource subsurface investigations.
2. Project 2017-11-07927 was associated with Sound Transit's SEPA process for the I-405 BRT Project, which included the buildings that are currently proposed to be demolished, along with development of the rest of the site as a transit center, and the entire BRT corridor. Sound Transit issued a SEPA DNS for the BRT project. Following required SEPA procedures for SEPA notification, the SEPA DNS was distributed on September 30, 2020 to area tribes which would include tribes identified as "affected Tribes" for Section 106 purposes. Additionally, the DNS was sent to SHPO on the same date. No comments were received from the Tribes or SHPO.
3. The eventual SRTC project construction work has received access to federal funding. NEPA work for the full project will be led by FTA, with additional Section 106 consultation provided for that full project.

I have previously coordinated with Holly on the buildings that are now being reviewed under project 2021-07-04474, and I believe our NRHP eligibility recommendations will align with her determinations (for lack of a better word here).

For project 2021-07-04474 I would like to request a letter from your office stating your determinations/opinions on NRHP eligibility so that we are able to meet FTA's NEPA needs in the future, as well as to confirm lack of issues with this demolition prior to Sound Transit's proceeding with the work. Ideally it would be useful if your letter stated that your review for 04474 was performed in line with Section 106 process and practices. Because of the safety situation on this site that leads to the need for the project in the near future, we are trying to move as quickly as possible, so a speedy review would be greatly appreciated.

I would be more than happy to discuss this project with you so please do let me know if you have any questions or concerns.

Alex

Alex E. Stevenson
Cultural Resources Program Manager
Sound Transit
Desk: 206-553-3655
Mobile: 206-419-5315

Pronouns: He/Him/His

Connect with us
[facebook.com/SoundTransit](https://www.facebook.com/SoundTransit)
twitter.com/SoundTransit



Determination of Effects Concurrence



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

July 28, 2021

Mr. Alexander Stevenson
Cultural Resources Program Manager
Sound Transit

In future correspondence please refer to:
Project Tracking Code: 2021-07-04474
Property: South Renton Transit Center Site Building Demolition Project
Re: NOT Eligible

Dear Mr. Stevenson:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP). The above referenced property has been reviewed on behalf of the SHPO under provisions of Washington State Law. Our review is based upon documentation contained in your communication.

As a result of our review, we concur with your determination that the following historic resources are NOT ELIGIBLE for the National Register of Historic Places:

- Property ID: 343450, commercial building at 720 Rainier Ave S, Renton, Washington, 98057
- Property ID: 713412, Sound Collision Center at 720 Rainier Ave S, Renton, WA, 98057, USA
- Property ID: 713411, Robinson and Lyon Ford Dealership at 750 Rainier Ave S, Renton, WA, 98057, USA

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Holly Borth'. The signature is written in a cursive, flowing style.

Holly Borth
Project Compliance Reviewer
(360) 890-0174
holly.borth@dahp.wa.gov



**Section 106 Correspondence
DAHP Project 2020-12-07493**



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 20, 2021

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

**Subject: Sound Transit
South Renton Transit Center Early Boring and Design Investigations Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination**

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Early Boring and Design Investigations Project (Project). The Project would implement a subsurface soil boring and design investigations effort to support the future South Renton Transit Center facility in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, requests your feedback on the proposed Area of Potential Effects (APE), and requests your concurrence with the proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Environmental Science Associates (ESA) has prepared the *South Renton Transit Center Early Boring and Design Investigations Project Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan*, dated April 2021 (Cultural Resources Assessment). A copy of the Cultural Resources Assessment is enclosed with this letter for your review.

Undertaking Description

The Project proposes several investigations at the site of the future South Renton Transit Center facility, and adjacent streets where roadway improvements are planned as part of the transit

center development, including State Route 167/Rainier Avenue South, Hardie Avenue SW, and Lake Avenue South within the City of Renton (see Figures 1 and 2 in the Cultural Resources Assessment). The proposed Project activities consist of:

- **Geoarchaeological borings:** Up to 15, 2-inch-diameter, sleeved, direct-push geoprobes would be taken to a target depth of 50 feet, for laboratory-based archaeological assessment and classification.
- **Geotechnical borings:** Up to 11, 6-inch diameter machine-drilled borings between 10 and 80 feet deep, would be used to gather geotechnical and seismic information. A groundwater monitoring well would be installed in two of the boring locations.
- **Environmental site assessment borings:** Up to 24, 2-inch-diameter borings approximately 10 feet deep, would be taken using direct-push drilling methods to further characterize hazardous materials contamination at the site. In addition, four groundwater monitoring wells would be installed.
- **Infiltration test pit:** Excavation would be conducted 5 to 10 feet deep, and 100 square feet in area at the bottom of the pit, to inform stormwater drainage design.
- **Utility potholing:** Up to 33, 12-inch diameter utility potholes approximately 3 to 6 feet deep, would be used to determine the exact location of utility lines that may be critical for design and construction of the transit center.

The locations of the Project boring and design investigation activities are shown on Figure 2 of the Cultural Resources Assessment. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each activity described in the list above, and extends in a 100-foot radius around each activity, as shown on Figures 1 and 2 of the Cultural Resources Assessment. The APE includes the access and work area for each of the boring and design investigation activities.

Cultural Resources Evaluation

The enclosed Cultural Resources Assessment documents the results of the background research conducted for the Project by ESA. ESA staff reviewed geological mapping, the Washington Information System for Architectural and Archaeological Data (WISAARD) database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and previous studies within the vicinity of the investigation activities proposed by the Project.

Archaeological Resources

The APE has not been previously surveyed for cultural resources, and there are no previously recorded archaeological sites, cemeteries, or ethnographic places within the APE. Four geotechnical borings at the Project site were drilled in 2019 (prior to involvement by FTA). The geotechnical borings encountered imported fill to depths of 7.5 feet below ground surface (bgs), and identified alluvial sediments beneath the fill deposit in all borings to the full depths explored (i.e., 45 to 81.5 feet bgs). All of the borings observed a 2.5- to 5-foot-thick organic silt layer in the upper 30 feet. One of the borings observed a 5-foot-thick peat deposit at 30 feet bgs.

May 20, 2021

Page 3

Archaeological monitoring will follow the Monitoring and Inadvertent Discovery protocols included in the Cultural Resources Assessment. Monitoring is proposed for the 15 geoarchaeological borings to further understand the nature of the previously observed peat deposit as well as the organic-rich silty alluvium. The Cultural Resources Assessment also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials.

Historic Resources

There are no historic structures within the APE. No buildings, structures, or objects will be demolished or modified by the Project, and no changes to the viewshed are anticipated as a result of the Project.

Determinations

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 100-foot radius around each investigation location as depicted on Figures 1 and 2 of the enclosed Cultural Resources Assessment.
- There are no resources listed on, or eligible for, the National Register of Historic Places within the Project APE.
- There will be **no historic properties affected** as a result of the Project.

Pursuant to 36 CFR Part 800, FTA is seeking SHPO concurrence with these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Kathy Fendt, East Corridor Environmental Manager, Sound Transit
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: South Renton Transit Center, Early Boring and Design Investigations Project
Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan,
April 2021



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 20, 2021

The Honorable Jaison Elkins
Chairman
Muckleshoot Indian Tribe
39015 - 172nd Avenue SE
Auburn, WA 98092

**Subject: Sound Transit
South Renton Transit Center Early Boring and Design Investigations Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination**

Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Early Boring and Design Investigations Project (Project). The Project would implement a subsurface soil boring and design investigations effort to support the future South Renton Transit Center facility in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your feedback on the proposed Area of Potential Effects (APE), and proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Environmental Science Associates (ESA) has prepared the *South Renton Transit Center Early Boring and Design Investigations Project Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan*, dated April 2021 (Cultural Resources Assessment). A copy of the Cultural Resources Assessment is enclosed with this letter for your review.

Undertaking Description

The Project proposes several investigations at the site of the future South Renton Transit Center facility, and adjacent streets where roadway improvements are planned as part of the transit center development, including State Route 167/Rainier Avenue South, Hardie Avenue SW, and

Lake Avenue South within the City of Renton (see Figures 1 and 2 in the Cultural Resources Assessment). The proposed Project activities consist of:

- **Geoarchaeological borings:** Up to 15, 2-inch-diameter, sleeved, direct-push geoprobes would be taken to a target depth of 50 feet, for laboratory-based archaeological assessment and classification.
- **Geotechnical borings:** Up to 11, 6-inch diameter machine-drilled borings between 10 and 80 feet deep, would be used to gather geotechnical and seismic information. A groundwater monitoring well would be installed in two of the boring locations.
- **Environmental site assessment borings:** Up to 24, 2-inch-diameter borings approximately 10 feet deep, would be taken using direct-push drilling methods to further characterize hazardous materials contamination at the site. In addition, four groundwater monitoring wells would be installed.
- **Infiltration test pit:** Excavation would be conducted 5 to 10 feet deep, and 100 square feet in area at the bottom of the pit, to inform stormwater drainage design.
- **Utility potholing:** Up to 33, 12-inch diameter utility potholes approximately 3 to 6 feet deep, would be used to determine the exact location of utility lines that may be critical for design and construction of the transit center.

The locations of the Project boring and design investigation activities are shown on Figure 2 of the Cultural Resources Assessment. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each activity described in the list above, and extends in a 100-foot radius around each activity, as shown on Figures 1 and 2 of the Cultural Resources Assessment. The APE includes the access and work area for each of the boring and design investigation activities.

Cultural Resources Evaluation

The enclosed Cultural Resources Assessment documents the results of the background research conducted for the Project by ESA. ESA staff reviewed geological mapping, the Washington Information System for Architectural and Archaeological Data (WISAARD) database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and previous studies within the vicinity of the investigation activities proposed by the Project.

Archaeological Resources

The APE has not been previously surveyed for cultural resources, and there are no previously recorded archaeological sites, cemeteries, or ethnographic places within the APE. Four geotechnical borings at the Project site were drilled in 2019 (prior to involvement by FTA). The geotechnical borings encountered imported fill to depths of 7.5 feet below ground surface (bgs), and identified alluvial sediments beneath the fill deposit in all borings to the full depths explored (i.e., 45 to 81.5 feet bgs). All of the borings observed a 2.5- to 5-foot-thick organic silt layer in the upper 30 feet. One of the borings observed a 5-foot-thick peat deposit at 30 feet bgs.

Archaeological monitoring will follow the Monitoring and Inadvertent Discovery protocols included in the Cultural Resources Assessment. Monitoring is proposed for the 15

May 20, 2021

Page 3

geoarchaeological borings to further understand the nature of the previously observed peat deposit as well as the organic-rich silty alluvium. The Cultural Resources Assessment also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials.

Historic Resources

There are no historic structures within the APE. No buildings, structures, or objects will be demolished or modified by the Project, and no changes to the viewshed are anticipated as a result of the Project.

Determinations

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 100-foot radius around each investigation location as depicted on Figures 1 and 2 of the enclosed Cultural Resources Assessment.
- There are no resources listed on, or eligible for, the National Register of Historic Places within the Project APE.
- There will be **no historic properties affected** as a result of the Project.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Madrienne White, Public and Government Relations Manager, Muckleshoot Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Kathy Fendt, East Corridor Environmental Manager, Sound Transit
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: South Renton Transit Center, Early Boring and Design Investigations Project
Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan,
April 2021



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 20, 2021

The Honorable Bill Sterud
Chairman
Puyallup Tribe of the Puyallup Reservation
3009 East Portland Avenue
Tacoma, WA 98404

**Subject: Sound Transit
South Renton Transit Center Early Boring and Design Investigations Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination**

Dear Chairman Sterud:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Early Boring and Design Investigations Project (Project). The Project would implement a subsurface soil boring and design investigations effort to support the future South Renton Transit Center facility in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your feedback on the proposed Area of Potential Effects (APE), and proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Environmental Science Associates (ESA) has prepared the *South Renton Transit Center Early Boring and Design Investigations Project Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan*, dated April 2021 (Cultural Resources Assessment). A copy of the Cultural Resources Assessment is enclosed with this letter for your review.

Undertaking Description

The Project proposes several investigations at the site of the future South Renton Transit Center facility, and adjacent streets where roadway improvements are planned as part of the transit center development, including State Route 167/Rainier Avenue South, Hardie Avenue SW, and

Lake Avenue South within the City of Renton (see Figures 1 and 2 in the Cultural Resources Assessment). The proposed Project activities consist of:

- **Geoarchaeological borings:** Up to 15, 2-inch-diameter, sleeved, direct-push geoprobes would be taken to a target depth of 50 feet, for laboratory-based archaeological assessment and classification.
- **Geotechnical borings:** Up to 11, 6-inch diameter machine-drilled borings between 10 and 80 feet deep, would be used to gather geotechnical and seismic information. A groundwater monitoring well would be installed in two of the boring locations.
- **Environmental site assessment borings:** Up to 24, 2-inch-diameter borings approximately 10 feet deep, would be taken using direct-push drilling methods to further characterize hazardous materials contamination at the site. In addition, four groundwater monitoring wells would be installed.
- **Infiltration test pit:** Excavation would be conducted 5 to 10 feet deep, and 100 square feet in area at the bottom of the pit, to inform stormwater drainage design.
- **Utility potholing:** Up to 33, 12-inch diameter utility potholes approximately 3 to 6 feet deep, would be used to determine the exact location of utility lines that may be critical for design and construction of the transit center.

The locations of the Project boring and design investigation activities are shown on Figure 2 of the Cultural Resources Assessment. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each activity described in the list above, and extends in a 100-foot radius around each activity, as shown on Figures 1 and 2 of the Cultural Resources Assessment. The APE includes the access and work area for each of the boring and design investigation activities.

Cultural Resources Evaluation

The enclosed Cultural Resources Assessment documents the results of the background research conducted for the Project by ESA. ESA staff reviewed geological mapping, the Washington Information System for Architectural and Archaeological Data (WISAARD) database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and previous studies within the vicinity of the investigation activities proposed by the Project.

Archaeological Resources

The APE has not been previously surveyed for cultural resources, and there are no previously recorded archaeological sites, cemeteries, or ethnographic places within the APE. Four geotechnical borings at the Project site were drilled in 2019 (prior to involvement by FTA). The geotechnical borings encountered imported fill to depths of 7.5 feet below ground surface (bgs), and identified alluvial sediments beneath the fill deposit in all borings to the full depths explored (i.e., 45 to 81.5 feet bgs). All of the borings observed a 2.5- to 5-foot-thick organic silt layer in the upper 30 feet. One of the borings observed a 5-foot-thick peat deposit at 30 feet bgs.

Archaeological monitoring will follow the Monitoring and Inadvertent Discovery protocols included in the Cultural Resources Assessment. Monitoring is proposed for the 15

May 20, 2021

Page 3

geoarchaeological borings to further understand the nature of the previously observed peat deposit as well as the organic-rich silty alluvium. The Cultural Resources Assessment also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials.

Historic Resources

There are no historic structures within the APE. No buildings, structures, or objects will be demolished or modified by the Project, and no changes to the viewshed are anticipated as a result of the Project.

Determinations

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 100-foot radius around each investigation location as depicted on Figures 1 and 2 of the enclosed Cultural Resources Assessment.
- There are no resources listed on, or eligible for, the National Register of Historic Places within the Project APE.
- There will be **no historic properties affected** as a result of the Project.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Brandon Reynon, Cultural Resources, Puyallup Tribe of the Puyallup Reservation
Jennifer Keating, Land Use Planner, Puyallup Tribe of the Puyallup Reservation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Kathy Fendt, East Corridor Environmental Manager, Sound Transit
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: South Renton Transit Center, Early Boring and Design Investigations Project
Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan,
April 2021



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 20, 2021

The Honorable Robert de los Angeles
Chairman
Snoqualmie Indian Tribe
P.O. Box 969
Snoqualmie, WA 98065

**Subject: Sound Transit
South Renton Transit Center Early Boring and Design Investigations Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination**

Dear Chairman de los Angeles:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Early Boring and Design Investigations Project (Project). The Project would implement a subsurface soil boring and design investigations effort to support the future South Renton Transit Center facility in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your feedback on the proposed Area of Potential Effects (APE), and proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Environmental Science Associates (ESA) has prepared the *South Renton Transit Center Early Boring and Design Investigations Project Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan*, dated April 2021 (Cultural Resources Assessment). A copy of the Cultural Resources Assessment is enclosed with this letter for your review.

Undertaking Description

The Project proposes several investigations at the site of the future South Renton Transit Center facility, and adjacent streets where roadway improvements are planned as part of the transit center development, including State Route 167/Rainier Avenue South, Hardie Avenue SW, and

Lake Avenue South within the City of Renton (see Figures 1 and 2 in the Cultural Resources Assessment). The proposed Project activities consist of:

- **Geoarchaeological borings:** Up to 15, 2-inch-diameter, sleeved, direct-push geoprobes would be taken to a target depth of 50 feet, for laboratory-based archaeological assessment and classification.
- **Geotechnical borings:** Up to 11, 6-inch diameter machine-drilled borings between 10 and 80 feet deep, would be used to gather geotechnical and seismic information. A groundwater monitoring well would be installed in two of the boring locations.
- **Environmental site assessment borings:** Up to 24, 2-inch-diameter borings approximately 10 feet deep, would be taken using direct-push drilling methods to further characterize hazardous materials contamination at the site. In addition, four groundwater monitoring wells would be installed.
- **Infiltration test pit:** Excavation would be conducted 5 to 10 feet deep, and 100 square feet in area at the bottom of the pit, to inform stormwater drainage design.
- **Utility potholing:** Up to 33, 12-inch diameter utility potholes approximately 3 to 6 feet deep, would be used to determine the exact location of utility lines that may be critical for design and construction of the transit center.

The locations of the Project boring and design investigation activities are shown on Figure 2 of the Cultural Resources Assessment. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each activity described in the list above, and extends in a 100-foot radius around each activity, as shown on Figures 1 and 2 of the Cultural Resources Assessment. The APE includes the access and work area for each of the boring and design investigation activities.

Cultural Resources Evaluation

The enclosed Cultural Resources Assessment documents the results of the background research conducted for the Project by ESA. ESA staff reviewed geological mapping, the Washington Information System for Architectural and Archaeological Data (WISAARD) database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and previous studies within the vicinity of the investigation activities proposed by the Project.

Archaeological Resources

The APE has not been previously surveyed for cultural resources, and there are no previously recorded archaeological sites, cemeteries, or ethnographic places within the APE. Four geotechnical borings at the Project site were drilled in 2019 (prior to involvement by FTA). The geotechnical borings encountered imported fill to depths of 7.5 feet below ground surface (bgs), and identified alluvial sediments beneath the fill deposit in all borings to the full depths explored (i.e., 45 to 81.5 feet bgs). All of the borings observed a 2.5- to 5-foot-thick organic silt layer in the upper 30 feet. One of the borings observed a 5-foot-thick peat deposit at 30 feet bgs.

Archaeological monitoring will follow the Monitoring and Inadvertent Discovery protocols included in the Cultural Resources Assessment. Monitoring is proposed for the 15

May 20, 2021

Page 3

geoarchaeological borings to further understand the nature of the previously observed peat deposit as well as the organic-rich silty alluvium. The Cultural Resources Assessment also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials.

Historic Resources

There are no historic structures within the APE. No buildings, structures, or objects will be demolished or modified by the Project, and no changes to the viewshed are anticipated as a result of the Project.

Determinations

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 100-foot radius around each investigation location as depicted on Figures 1 and 2 of the enclosed Cultural Resources Assessment.
- There are no resources listed on, or eligible for, the National Register of Historic Places within the Project APE.
- There will be **no historic properties affected** as a result of the Project.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Steven Mullen-Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Kathy Fendt, East Corridor Environmental Manager, Sound Transit
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: South Renton Transit Center, Early Boring and Design Investigations Project
Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan,
April 2021



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 20, 2021

The Honorable Leonard Forsman
Chairman
Suquamish Indian Tribe of the Port Madison Reservation
P.O. Box 498
Suquamish, WA 98392-0498

**Subject: Sound Transit
South Renton Transit Center Early Boring and Design Investigations Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination**

Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Early Boring and Design Investigations Project (Project). The Project would implement a subsurface soil boring and design investigations effort to support the future South Renton Transit Center facility in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your feedback on the proposed Area of Potential Effects (APE), and proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Environmental Science Associates (ESA) has prepared the *South Renton Transit Center Early Boring and Design Investigations Project Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan*, dated April 2021 (Cultural Resources Assessment). A copy of the Cultural Resources Assessment is enclosed with this letter for your review.

Undertaking Description

The Project proposes several investigations at the site of the future South Renton Transit Center facility, and adjacent streets where roadway improvements are planned as part of the transit center development, including State Route 167/Rainier Avenue South, Hardie Avenue SW, and

Lake Avenue South within the City of Renton (see Figures 1 and 2 in the Cultural Resources Assessment). The proposed Project activities consist of:

- **Geoarchaeological borings:** Up to 15, 2-inch-diameter, sleeved, direct-push geoprobes would be taken to a target depth of 50 feet, for laboratory-based archaeological assessment and classification.
- **Geotechnical borings:** Up to 11, 6-inch diameter machine-drilled borings between 10 and 80 feet deep, would be used to gather geotechnical and seismic information. A groundwater monitoring well would be installed in two of the boring locations.
- **Environmental site assessment borings:** Up to 24, 2-inch-diameter borings approximately 10 feet deep, would be taken using direct-push drilling methods to further characterize hazardous materials contamination at the site. In addition, four groundwater monitoring wells would be installed.
- **Infiltration test pit:** Excavation would be conducted 5 to 10 feet deep, and 100 square feet in area at the bottom of the pit, to inform stormwater drainage design.
- **Utility potholing:** Up to 33, 12-inch diameter utility potholes approximately 3 to 6 feet deep, would be used to determine the exact location of utility lines that may be critical for design and construction of the transit center.

The locations of the Project boring and design investigation activities are shown on Figure 2 of the Cultural Resources Assessment. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each activity described in the list above, and extends in a 100-foot radius around each activity, as shown on Figures 1 and 2 of the Cultural Resources Assessment. The APE includes the access and work area for each of the boring and design investigation activities.

Cultural Resources Evaluation

The enclosed Cultural Resources Assessment documents the results of the background research conducted for the Project by ESA. ESA staff reviewed geological mapping, the Washington Information System for Architectural and Archaeological Data (WISAARD) database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and previous studies within the vicinity of the investigation activities proposed by the Project.

Archaeological Resources

The APE has not been previously surveyed for cultural resources, and there are no previously recorded archaeological sites, cemeteries, or ethnographic places within the APE. Four geotechnical borings at the Project site were drilled in 2019 (prior to involvement by FTA). The geotechnical borings encountered imported fill to depths of 7.5 feet below ground surface (bgs), and identified alluvial sediments beneath the fill deposit in all borings to the full depths explored (i.e., 45 to 81.5 feet bgs). All of the borings observed a 2.5- to 5-foot-thick organic silt layer in the upper 30 feet. One of the borings observed a 5-foot-thick peat deposit at 30 feet bgs.

Archaeological monitoring will follow the Monitoring and Inadvertent Discovery protocols included in the Cultural Resources Assessment. Monitoring is proposed for the 15

May 20, 2021

Page 3

geoarchaeological borings to further understand the nature of the previously observed peat deposit as well as the organic-rich silty alluvium. The Cultural Resources Assessment also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials.

Historic Resources

There are no historic structures within the APE. No buildings, structures, or objects will be demolished or modified by the Project, and no changes to the viewshed are anticipated as a result of the Project.

Determinations

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 100-foot radius around each investigation location as depicted on Figures 1 and 2 of the enclosed Cultural Resources Assessment.
- There are no resources listed on, or eligible for, the National Register of Historic Places within the Project APE.
- There will be **no historic properties affected** as a result of the Project.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Dennis Lewarch, Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port
Madison Reservation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Kathy Fendt, East Corridor Environmental Manager, Sound Transit
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: South Renton Transit Center, Early Boring and Design Investigations Project
Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan,
April 2021



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 20, 2021

The Honorable Teri Gobin
Chairwoman
Tulalip Tribes of Washington
6406 Marine Drive
Tulalip, WA 98271

**Subject: Sound Transit
South Renton Transit Center Early Boring and Design Investigations Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination**

Dear Chairwoman Gobin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Early Boring and Design Investigations Project (Project). The Project would implement a subsurface soil boring and design investigations effort to support the future South Renton Transit Center facility in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your feedback on the proposed Area of Potential Effects (APE), and proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Environmental Science Associates (ESA) has prepared the *South Renton Transit Center Early Boring and Design Investigations Project Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan*, dated April 2021 (Cultural Resources Assessment). A copy of the Cultural Resources Assessment is enclosed with this letter for your review.

Undertaking Description

The Project proposes several investigations at the site of the future South Renton Transit Center facility, and adjacent streets where roadway improvements are planned as part of the transit center development, including State Route 167/Rainier Avenue South, Hardie Avenue SW, and

Lake Avenue South within the City of Renton (see Figures 1 and 2 in the Cultural Resources Assessment). The proposed Project activities consist of:

- **Geoarchaeological borings:** Up to 15, 2-inch-diameter, sleeved, direct-push geoprobes would be taken to a target depth of 50 feet, for laboratory-based archaeological assessment and classification.
- **Geotechnical borings:** Up to 11, 6-inch diameter machine-drilled borings between 10 and 80 feet deep, would be used to gather geotechnical and seismic information. A groundwater monitoring well would be installed in two of the boring locations.
- **Environmental site assessment borings:** Up to 24, 2-inch-diameter borings approximately 10 feet deep, would be taken using direct-push drilling methods to further characterize hazardous materials contamination at the site. In addition, four groundwater monitoring wells would be installed.
- **Infiltration test pit:** Excavation would be conducted 5 to 10 feet deep, and 100 square feet in area at the bottom of the pit, to inform stormwater drainage design.
- **Utility potholing:** Up to 33, 12-inch diameter utility potholes approximately 3 to 6 feet deep, would be used to determine the exact location of utility lines that may be critical for design and construction of the transit center.

The locations of the Project boring and design investigation activities are shown on Figure 2 of the Cultural Resources Assessment. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each activity described in the list above, and extends in a 100-foot radius around each activity, as shown on Figures 1 and 2 of the Cultural Resources Assessment. The APE includes the access and work area for each of the boring and design investigation activities.

Cultural Resources Evaluation

The enclosed Cultural Resources Assessment documents the results of the background research conducted for the Project by ESA. ESA staff reviewed geological mapping, the Washington Information System for Architectural and Archaeological Data (WISAARD) database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and previous studies within the vicinity of the investigation activities proposed by the Project.

Archaeological Resources

The APE has not been previously surveyed for cultural resources, and there are no previously recorded archaeological sites, cemeteries, or ethnographic places within the APE. Four geotechnical borings at the Project site were drilled in 2019 (prior to involvement by FTA). The geotechnical borings encountered imported fill to depths of 7.5 feet below ground surface (bgs), and identified alluvial sediments beneath the fill deposit in all borings to the full depths explored (i.e., 45 to 81.5 feet bgs). All of the borings observed a 2.5- to 5-foot-thick organic silt layer in the upper 30 feet. One of the borings observed a 5-foot-thick peat deposit at 30 feet bgs.

Archaeological monitoring will follow the Monitoring and Inadvertent Discovery protocols included in the Cultural Resources Assessment. Monitoring is proposed for the 15

May 20, 2021

Page 3

geoarchaeological borings to further understand the nature of the previously observed peat deposit as well as the organic-rich silty alluvium. The Cultural Resources Assessment also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials.

Historic Resources

There are no historic structures within the APE. No buildings, structures, or objects will be demolished or modified by the Project, and no changes to the viewshed are anticipated as a result of the Project.

Determinations

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 100-foot radius around each investigation location as depicted on Figures 1 and 2 of the enclosed Cultural Resources Assessment.
- There are no resources listed on, or eligible for, the National Register of Historic Places within the Project APE.
- There will be **no historic properties affected** as a result of the Project.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve,
Tulalip Tribes of Washington
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Kathy Fendt, East Corridor Environmental Manager, Sound Transit
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: South Renton Transit Center, Early Boring and Design Investigations Project
Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan,
April 2021



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 20, 2021

The Honorable Delano Saluskin
Chairman
Confederated Tribes and Bands of the Yakama Nation
P.O. Box 151
Toppenish, WA 98948

**Subject: Sound Transit
South Renton Transit Center Early Boring and Design Investigations Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination**

Dear Chairman Saluskin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the South Renton Transit Center Early Boring and Design Investigations Project (Project). The Project would implement a subsurface soil boring and design investigations effort to support the future South Renton Transit Center facility in Renton, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your feedback on the proposed Area of Potential Effects (APE), and proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Environmental Science Associates (ESA) has prepared the *South Renton Transit Center Early Boring and Design Investigations Project Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan*, dated April 2021 (Cultural Resources Assessment). A copy of the Cultural Resources Assessment is enclosed with this letter for your review.

Undertaking Description

The Project proposes several investigations at the site of the future South Renton Transit Center facility, and adjacent streets where roadway improvements are planned as part of the transit center development, including State Route 167/Rainier Avenue South, Hardie Avenue SW, and

Lake Avenue South within the City of Renton (see Figures 1 and 2 in the Cultural Resources Assessment). The proposed Project activities consist of:

- **Geoarchaeological borings:** Up to 15, 2-inch-diameter, sleeved, direct-push geoprobes would be taken to a target depth of 50 feet, for laboratory-based archaeological assessment and classification.
- **Geotechnical borings:** Up to 11, 6-inch diameter machine-drilled borings between 10 and 80 feet deep, would be used to gather geotechnical and seismic information. A groundwater monitoring well would be installed in two of the boring locations.
- **Environmental site assessment borings:** Up to 24, 2-inch-diameter borings approximately 10 feet deep, would be taken using direct-push drilling methods to further characterize hazardous materials contamination at the site. In addition, four groundwater monitoring wells would be installed.
- **Infiltration test pit:** Excavation would be conducted 5 to 10 feet deep, and 100 square feet in area at the bottom of the pit, to inform stormwater drainage design.
- **Utility potholing:** Up to 33, 12-inch diameter utility potholes approximately 3 to 6 feet deep, would be used to determine the exact location of utility lines that may be critical for design and construction of the transit center.

The locations of the Project boring and design investigation activities are shown on Figure 2 of the Cultural Resources Assessment. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each activity described in the list above, and extends in a 100-foot radius around each activity, as shown on Figures 1 and 2 of the Cultural Resources Assessment. The APE includes the access and work area for each of the boring and design investigation activities.

Cultural Resources Evaluation

The enclosed Cultural Resources Assessment documents the results of the background research conducted for the Project by ESA. ESA staff reviewed geological mapping, the Washington Information System for Architectural and Archaeological Data (WISAARD) database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and previous studies within the vicinity of the investigation activities proposed by the Project.

Archaeological Resources

The APE has not been previously surveyed for cultural resources, and there are no previously recorded archaeological sites, cemeteries, or ethnographic places within the APE. Four geotechnical borings at the Project site were drilled in 2019 (prior to involvement by FTA). The geotechnical borings encountered imported fill to depths of 7.5 feet below ground surface (bgs), and identified alluvial sediments beneath the fill deposit in all borings to the full depths explored (i.e., 45 to 81.5 feet bgs). All of the borings observed a 2.5- to 5-foot-thick organic silt layer in the upper 30 feet. One of the borings observed a 5-foot-thick peat deposit at 30 feet bgs.

Archaeological monitoring will follow the Monitoring and Inadvertent Discovery protocols included in the Cultural Resources Assessment. Monitoring is proposed for the 15

May 20, 2021

Page 3

geoarchaeological borings to further understand the nature of the previously observed peat deposit as well as the organic-rich silty alluvium. The Cultural Resources Assessment also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials.

Historic Resources

There are no historic structures within the APE. No buildings, structures, or objects will be demolished or modified by the Project, and no changes to the viewshed are anticipated as a result of the Project.

Determinations

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 100-foot radius around each investigation location as depicted on Figures 1 and 2 of the enclosed Cultural Resources Assessment.
- There are no resources listed on, or eligible for, the National Register of Historic Places within the Project APE.
- There will be **no historic properties affected** as a result of the Project.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke
Regional Administrator

cc: Kate Valdez, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
Kathy Fendt, East Corridor Environmental Manager, Sound Transit
Dezerae Hayes, Director of Tribal Relations, Sound Transit
Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: South Renton Transit Center, Early Boring and Design Investigations Project
Cultural Resources Assessment and Monitoring and Inadvertent Discovery Plan,
April 2021

Determination of Effects Concurrence



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

May 25, 2021

Ms. Linda Gehrke
Regional Administrator
Federal Transit Administration
915 Second Avenue
Suite 3142
Seattle, WA. 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2020-12-07493
Property: South Renton Transit Center Project
Re: No Historic Properties Affected

Dear Ms. Gehrke:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. Your communication on this action has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

First, we agree with the project area of potential effect (APE) as mapped in your documentation. We also concur with the monitoring recommendation for the proposed geotechnical boring. Finally, we concur that no historic properties will be affected by the current project as proposed. As a result of our concurrence, further contact with DAHP on this proposal is not necessary.

However, if new information about affected resources becomes available and/or the project scope of work changes significantly, please resume consultation as our assessment may be revised. Also, if any archaeological resources are uncovered during construction, please halt work immediately in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

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

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov



Appendix B

Geoarchaeological Boring Data

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
1	1	0-1	Geoprobe	grayish-brown	sand (no bedding)	medium no sand sorting	15-35% no sorting angular medium	hard	structureless	abrupt no horizon topography	fill		yes	no	Brick fragments (not collected).
1	2	1-5	Geoprobe	gray	silt (no bedding)	fine no sand sorting	no gravel	hard	structureless	no horizon	C		no	no	
1	3	5-10	Geoprobe	gray	silt (no bedding)	very fine no sand sorting	no gravel	moderately hard	structureless	no horizon	C	groundwater	no	no	
1	4	10-13	Geoprobe	gray	silt (no bedding)	very fine no sand sorting	no gravel	moderately hard	structureless	diffuse no horizon topography	C	groundwater	no	no	
1	5	13-15	Geoprobe	grayish-brown	silt (no bedding)	sand absent	no gravel	moderately hard	structureless	no horizon	C	organics mottled	no	no	
1	6	15-17	Geoprobe	gray	sand (no bedding)	fine no sand sorting	no gravel	moderately hard	structureless	diffuse no horizon topography	C	organics groundwater mottled	no	no	Wood fragments.
1	7	17-20	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	no gravel	moderately hard	structureless	no horizon	C	groundwater	no	no	
1	8	20-22	Geoprobe	gray	silt (no bedding)	sand absent	no gravel	hard	structureless	clear no horizon topography	C	organics mottled	no	no	Wood fragments.
1	9	22-23	Geoprobe	gray	sand (no bedding)	very fine no sand sorting	no gravel	moderately hard	structureless	clear no horizon topography	C		no	no	
1	10	23-25	Geoprobe	grayish-brown	silt (no bedding)	sand absent	no gravel	hard	structureless	no horizon	C	organics mottled	no	no	Seeds, leaf, wood fragments.
1	11	25-27	Geoprobe	gray	sand (no bedding)	medium no sand sorting	no gravel	moderately hard	structureless	diffuse no horizon topography	C	groundwater	no	no	
1	12	27-29	Geoprobe	gray	sand (no bedding)	fine no sand sorting	no gravel	hard	structureless	clear no horizon topography	C	organics mottled	no	no	Wood fragments.
1	13	29-30	Geoprobe	gray	sand (no bedding)	medium no sand sorting	60-90% no sorting subrounded medium	very hard	structureless	no horizon	C	groundwater	no	no	
1	14	30-32	Geoprobe	gray	sand (no bedding)	medium no sand sorting	no gravel	hard	structureless	diffuse no horizon topography	C	groundwater	no	no	
1	15	32-35	Geoprobe	gray	sand (no bedding)	coarse no sand sorting	60-90% moderately-sorted subrounded fine	very hard	structureless	no horizon	C	groundwater	no	no	
1	16	35-40	Geoprobe	gray	sand (no bedding)	coarse moderately-sorted	35-60% moderately-sorted subangular fine	very hard	structureless	no horizon	C	groundwater	no	no	
1	17	40-44	Geoprobe	gray	sand (no bedding)	coarse poorly-sorted	60-90% poorly-sorted subrounded fine	very hard	structureless	clear no horizon topography	C	groundwater	no	no	
1	18	44-45	Geoprobe	yellowish-brown	sand (no bedding)	medium no sand sorting	>90% no sorting subangular medium	very hard	structureless	no horizon	C	groundwater	no	no	

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
1	19	45-49	Geoprobe	gray	sand (no bedding)	medium poorly-sorted	35-60% poorly-sorted subrounded fine	very hard	structureless	diffuse no horizon topography	C	groundwater	no	no	
1	20	49-50	Geoprobe	reddish-brown	sand (no bedding)	coarse poorly-sorted	35-60% poorly-sorted subrounded fine	extremely hard	structureless	no horizon	C	groundwater oxidized	no	no	Terminated at desired depth.
2	1	0-3	Geoprobe	grayish-brown	sand (no bedding)	fine no sand sorting	<5% no sorting subrounded fine	slightly hard	structureless	diffuse no horizon topography	fill		no	no	
2	2	3-5	Geoprobe	gray	silt (no bedding)	very fine no sand sorting	no gravel	slightly hard	structureless	no horizon	C		no	no	
2	3	5-8	Geoprobe	gray	sand (no bedding)	medium no sand sorting	no gravel	slightly hard	structureless	clear no horizon topography	C	groundwater	no	no	
2	4	8-10	Geoprobe	grayish-brown	clay (no bedding)	sand absent	no gravel	slightly hard	structureless	no horizon	C	organics	no	no	Wood debris.
2	5	10-15	Geoprobe	gray	silty clay (no bedding)	sand absent	no gravel	soft	structureless	no horizon	C	organics groundwater	no	no	
2	6	15-20	Geoprobe	other	(no bedding)	sand absent no sand sorting	no gravel		structureless	no horizon	0		no	no	Sample jammed in tube and could not be recovered..
2	7	20-23	Geoprobe	gray	sand (no bedding)	medium no sand sorting	no gravel	hard	structureless	clear no horizon topography	C	groundwater	no	no	
2	8	23-25	Geoprobe	gray	silty clay (no bedding)	sand absent	no gravel	hard	structureless	no horizon	C	organics mottled	no	no	Abundant wood debris; wood sample collected.
2	9	25-26	Geoprobe	gray	sand (no bedding)	medium no sand sorting	no gravel	moderately hard	structureless	clear no horizon topography	C	groundwater	no	no	
2	10	26-29	Geoprobe	grayish-brown	silt (no bedding)	fine no sand sorting	no gravel	slightly hard	structureless	diffuse no horizon topography	C	organics mottled	no	no	
2	11	29-30	Geoprobe	gray	sand (no bedding)	fine no sand sorting	<5% no sorting subrounded fine	moderately hard	structureless	no horizon	C	groundwater	no	no	
2	12	30-35	Geoprobe	gray	sand (no bedding)	medium poorly-sorted	5-15% poorly-sorted subrounded fine	moderately hard	structureless	no horizon	C	organics groundwater	no	no	
2	13	35-39	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	15-35% moderately-sorted subrounded fine	moderately hard	structureless	clear no horizon topography	C	organics groundwater	no	no	
2	14	39-40	Geoprobe	gray	sand (no bedding)	coarse no sand sorting	60-90% no sorting subrounded medium	very hard	structureless	no horizon	C	groundwater	no	no	
2	15	40-43	Geoprobe	gray	sand (no bedding)	medium poorly-sorted	5-15% poorly-sorted subrounded fine	very hard	structureless	diffuse no horizon topography	C	groundwater	no	no	

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
2	16	43-45	Geoprobe	gray	sand (no bedding)	coarse poorly-sorted	60-90% poorly-sorted subrounded medium	very hard	structureless	no horizon	C	groundwater	no	no	
2	17	45-50	Geoprobe	gray	sand (no bedding)	very coarse no sand sorting	60-90% no sorting subrounded mixed	very hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.
3	1	0-3	Geoprobe	grayish-brown	sand (no bedding)	medium no sand sorting	5-15% no sorting angular medium	slightly hard	structureless	clear no horizon topography	fill		no	no	
3	2	3-5	Geoprobe	gray	sand (no bedding)	fine no sand sorting	<5% no sorting subrounded fine	slightly hard	structureless	no horizon	C		no	no	
3	3	5-8	Geoprobe	gray	sand (no bedding)	fine no sand sorting	<5% no sorting subrounded fine	slightly hard	structureless	diffuse no horizon topography	C	trace charcoal organics groundwater	no	no	
3	4	8-10	Geoprobe	gray	silt (no bedding)	sand absent	no gravel	slightly hard	structureless	no horizon	C	groundwater	no	no	
3	5	10-15	Geoprobe	gray	silt (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	no horizon	C	organics groundwater	no	no	
3	6	15-16	Geoprobe	gray	silt (no bedding)	very fine no sand sorting	no gravel	soft	structureless	clear no horizon topography	C	groundwater	no	no	
3	7	16-19	Geoprobe	gray	sand (no bedding)	medium poorly-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	groundwater	no	no	
3	8	19-21	Geoprobe	grayish-brown	silt (no bedding)	very fine no sand sorting	no gravel	slightly hard	structureless	diffuse no horizon topography	C	organics	no	no	Abundant wood and organic debris (collected).
3	9	21-29	Geoprobe	gray	silty clay (no bedding)	fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics	no	no	Wood fragment (collected).
3	10	29-35	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	60-90% poorly-sorted subrounded medium	hard	structureless	no horizon	C		no	no	
3	11	35-37	Geoprobe	gray	sand (no bedding)	medium poorly-sorted	15-35% moderately-sorted subrounded fine	hard	structureless	clear no horizon topography	C	groundwater	no	no	
3	12	37-38	Geoprobe	yellowish-brown	sand (no bedding)	fine poorly-sorted	no gravel	extremely hard	structureless	no horizon	C	mottled	no	no	Compacts sand impasse. Terminated at dense/impassable soils.
4	1	0-4	Geoprobe	grayish-brown	silt (no bedding)	fine no sand sorting	15-35% no sorting subangular medium	very hard	structureless	clear no horizon topography	fill		no	no	Petrol odor.
4	2	4-5	Geoprobe	gray	silt (no bedding)	very fine poorly-sorted	no gravel	slightly hard	structureless	no horizon	C		no	no	

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
4	3	5-9	Geoprobe	gray	sand (no bedding)	fine poorly-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	groundwater	no	no	
4	4	9-16	Geoprobe	gray	silty clay (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics	no	no	
4	5	16-19	Geoprobe	dark gray	sand (no bedding)	medium moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics groundwater	no	no	
4	6	19-28	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics groundwater	no	no	
4	7	28-34	Geoprobe	gray	sand (no bedding)	medium poorly-sorted	60-90% poorly-sorted subrounded medium	very hard	structureless	clear no horizon topography	C	groundwater	no	no	
4	8	34-35	Geoprobe	gray	sand (no bedding)	fine moderately-sorted	no gravel	slightly hard	structureless	no horizon	C	organics groundwater	no	no	Large chunk of decayed wood at top of strat.
4	9	35-38	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	60-90% moderately-sorted subrounded medium	very hard	structureless	clear no horizon topography	C	groundwater	no	no	
4	10	38-40	Geoprobe	gray	silt (no bedding)	very fine moderately-sorted	no gravel	moderately hard	structureless	no horizon	C	organics	no	no	
4	11	40-43	Geoprobe	gray	sand (no bedding)	medium no sand sorting	35-60% no sorting rounded medium	hard	structureless	clear no horizon topography	C	groundwater	no	no	Recovery tube was shredded. Partial recovery only..
4	12	43-45	Geoprobe	gray	silt (no bedding)	fine moderately-sorted	no gravel	hard	structureless	no horizon	C	organics	no	no	
4	13	45-48	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	35-60% moderately-sorted subrounded fine	hard	structureless	diffuse no horizon topography	C	groundwater	no	no	
4	14	48-50	Geoprobe	gray	silt (no bedding)	fine moderately-sorted	no gravel	hard	structureless	no horizon	C		no	no	Terminated at desired depth.
5	1	0-4	Geoprobe	grayish-brown	sand (no bedding)	medium no sand sorting	35-60% no sorting subangular medium	slightly hard	structureless	diffuse no horizon topography	fill		no	no	
5	2	4-5	Geoprobe	grayish-brown	silt (no bedding)	fine no sand sorting	no gravel no sorting fine	slightly hard	structureless	no horizon	C		no	no	
5	3	5-9	Geoprobe	gray	sand (no bedding)	fine moderately-sorted	no gravel	moderately hard	structureless	clear no horizon topography	C	groundwater	no	no	
5	4	9-11	Geoprobe	grayish-brown	silty clay (no bedding)	very fine no sand sorting	no gravel	slightly hard	structureless	diffuse no horizon topography	C	organics	no	no	
5	5	11-23	Geoprobe	gray	silty clay (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	organics groundwater	no	no	

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
5	6	23-26	Geoprobe	dark gray	sand (no bedding)	medium poorly-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics groundwater	no	no	
5	7	26-30	Geoprobe	gray	silty clay (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	no horizon	C	organics	no	no	1 seed pod, 4 wood debris collected..
5	8	30-31	Geoprobe	gray	sand (no bedding)	fine poorly-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics groundwater	no	no	
5	9	31-39	Geoprobe	gray	sand (no bedding)	coarse poorly-sorted	60-90% poorly-sorted subrounded mixed	moderately hard	structureless	clear no horizon topography	C	groundwater	no	no	
5	10	39-40	Geoprobe	gray	sand (no bedding)	very fine moderately-sorted	no gravel	moderately hard	structureless	no horizon	C		no	no	
5	11	40-44	Geoprobe	gray	sand (no bedding)	coarse moderately-sorted	60-90% moderately-sorted subrounded mixed	hard	structureless	clear no horizon topography	C		no	no	
5	12	44-45	Geoprobe	dark gray	sand (no bedding)	fine moderately-sorted	60-90% moderately-sorted subrounded mixed	very hard	structureless	no horizon	C		no	no	
5	13	45-48	Geoprobe	dark gray	sand (no bedding)	medium no sand sorting	no gravel	moderately hard	structureless	clear no horizon topography	C	groundwater	no	no	Sample jammed in tube and had to be extracted manually..
5	14	48-50	Geoprobe	gray	sand (no bedding)	coarse moderately-sorted	60-90% no sorting subrounded mixed	hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.
6	0	0-0													Not boring due to utility conflict.
7	1	0-3	Geoprobe	grayish-brown	sand (no bedding)	fine no sand sorting	35-60% no sorting subangular fine	very hard	structureless	clear no horizon topography	fill		no	no	
7	2	3-18	Geoprobe	gray	silty clay (no bedding)	fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics	no	no	Abundant wood debris and leaf matter. Collected: seed and wood (10-15 ftbs), wood (15-18 ftbs).
7	3	18-20	Geoprobe	dark gray	sand (no bedding)	fine moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	organics groundwater	no	no	
7	4	20-33	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	very abrupt no horizon topography	C	trace charcoal organics groundwater	no	no	Abundant wood and leaf debris, very similar to layer 2. Collected: wood (20-25 ftbs), charcoal (25-30 ftbs).
7	5	33-35	Geoprobe	dark gray	sand (no bedding)	medium moderately-sorted	15-35% moderately-sorted subrounded medium	slightly hard	structureless	clear no horizon topography	C	groundwater	no	no	

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
7	6	35-50	Geoprobe	dark gray	sand (no bedding)	coarse moderately-sorted	60-90% moderately-sorted subrounded mixed	moderately hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.
8	0	0-0													Not boring due to utility conflict.
9	1	0-10	Geoprobe	grayish-brown	sand (no bedding)	fine no sand sorting	15-35% no sorting angular mixed	moderately hard	structureless	clear no horizon topography	fill	groundwater	no	no	15 inches recovery 0-5 ftbs, 15 inches recover 5-10 ftbs. Water table @5 ftbs. disturbed fill, petroleum odor. Plum of contamination coming off building to the SW in this direction..
9	2	10-18	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	abrupt no horizon topography	C	organics groundwater	no	no	Collected: Wood (15-18 ftbs). Pockets of abundant wood and leaf debris..
9	3	18-21	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	groundwater	no	no	
9	4	21-36	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics mottled	no	no	Abundant wood and leaf debris. collected: wood (21-25 ftbs), wood (25-30 ftbs)..
9	5	36-50	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	60-90% moderately-sorted subrounded mixed	moderately hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.
10	1	0-3	Geoprobe	grayish-brown	sand (no bedding)	medium no sand sorting	35-60% no sorting subangular mixed	moderately hard	structureless	clear no horizon topography	fill		no	no	
10	2	3-5	Geoprobe	grayish-brown	silt loam (no bedding)	fine poorly-sorted	<5% poorly-sorted subangular mixed	moderately hard	structureless	clear no horizon topography	B	organics	yes	no	Abundant organic debris at transition with layer 1..
10	3	5-8	Geoprobe	gray	sand (no bedding)	fine moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	groundwater	no	no	
10	4	8-29	Geoprobe	grayish-brown	silt (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	organics groundwater	no	no	Abundant organic debris 11-13 ftbs and 16-19 ftbs. collected: wood (10-15 ftbs), wood (15-20 ftbs), .
10	5	29-31	Geoprobe	gray	sand (no bedding)	fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	groundwater	no	no	
10	6	31-39	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics	no	no	Abundant organic debris. Collected: wood (31-35 ftbs).
10	7	39-50	Geoprobe	gray	sand (no bedding)	very coarse moderately-sorted	60-90% moderately-sorted subrounded mixed	moderately hard	structureless	no horizon	C	organics groundwater	no	no	Wood debris (decayed log) @49 ftbs.. Terminated at desired depth.

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
11	1	0-10	Geoprobe	grayish-brown	sand (no bedding)	fine no sand sorting	15-35% no sorting subangular mixed	very hard	structureless	no horizon	fill	organics groundwater	yes	no	Concrete, glass, organic debris. Poor recovery 5-10 ftbs. Petroleum odor. Groundwater at 10 ftbs..
11	2	10-16	Geoprobe	gray	sand (no bedding)	fine poorly-sorted	no gravel	soft	structureless	diffuse no horizon topography	C	organics groundwater	no	no	50% recovery 10-15 ftbs. Few wood fragments (not collected)..
11	3	16-40	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	organics	no	historic	Abundant organic debris. 50% recovery 30-35 ftbs. Collected: 1 nail (17.5 ftbs), wood (25-30 ftbs).
11	4	40-50	Geoprobe	dark gray	sand (no bedding)	coarse moderately-sorted	60-90% moderately-sorted subrounded mixed	moderately hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.
12	0	0-0													Not boring due to utility conflict.
13	1	0-8	Geoprobe	grayish-brown	silt loam (no bedding)	fine no sand sorting	35-60% no sorting angular mixed	moderately hard	structureless	diffuse no horizon topography	fill	organics	yes	no	Glass, wood debris, concrete.
13	2	8-10	Geoprobe	gray	silt (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	no horizon	C	organics groundwater	no	no	
13	3	10-14	Geoprobe	gray	sand (no bedding)	medium moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	groundwater	no	no	
13	4	14-28	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	diffuse no horizon topography	C	organics	no	no	Abundant organic debris 18-20 ftbs. Collected: wood (14-15 ftbs), wood and seeds (18-20 ftbs), wood (20-25 ftbs).
13	5	28-30	Geoprobe	gray	sand (no bedding)	fine moderately-sorted	no gravel	slightly hard	structureless	no horizon	C	groundwater	no	no	
13	6	30-39	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	slightly hard	structureless	clear no horizon topography	C	organics	no	no	Collected: wood (30-35 ftbs).
13	7	39-50	Geoprobe	dark gray	sand (no bedding)	medium poorly-sorted	60-90% poorly-sorted subrounded mixed	moderately hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.
14	1	0-5	Geoprobe	grayish-brown	sand (no bedding)	medium no sand sorting	35-60% no sorting subangular mixed	moderately hard	structureless	no horizon	fill		no	no	Hand-augered 0-2 fbs due to possible storm sewer in area. Too gravelly for auger, so proceeded carefully with bore instead..
14	2	5-10	Geoprobe	0	(no bedding)	sand absent	no gravel		structureless	no horizon	0		no	no	No recovery.

HOLE	LAYER	DEPTH (cm)	TOOL	COLOR	TEXTURE	SAND MODE	GRAVEL MODE	CONSISTENCE	PEDS	BOTTOM BOUNDARY	SOIL HORIZON	SPECIAL FEATURES	MODERN DEBRIS	CULTURAL	COMMENTS
14	3	10-40	Geoprobe	grayish-brown	silty clay (no bedding)	fine moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	organics groundwater	no	no	Silty clay with pockets of sand and abundant organics. Collected: wood (15-20 ftbs), wood (20-25 ftbs)..
14	4	40-50	Geoprobe	dark gray	sand (no bedding)	medium moderately-sorted	60-90% moderately-sorted subrounded mixed	very hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.
15	1	0-5	Geoprobe	grayish-brown	sand (no bedding)	fine no sand sorting	35-60% no sorting angular mixed	moderately hard	structureless	clear no horizon topography	fill	organics	no	no	
15	2	5-6	Geoprobe	gray	sand (no bedding)	fine no sand sorting	35-60% no sorting subrounded mixed	slightly hard	structureless	clear no horizon topography	fill		no	no	CDF?.
15	3	6-12	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	diffuse no horizon topography	C	organics groundwater	no	no	
15	4	12-18	Geoprobe	dark gray	sand (no bedding)	medium moderately-sorted	no gravel	soft	structureless	diffuse no horizon topography	C	organics groundwater	no	no	
15	5	18-40	Geoprobe	grayish-brown	silty clay (no bedding)	very fine moderately-sorted	no gravel	soft	structureless	clear no horizon topography	C	organics groundwater	no	no	Silty clay with frequent sand pockets. abundant organic debris. Collected: Wood (18-20 ftbs), wood (25-30 ftbs), .
15	6	40-50	Geoprobe	dark gray	sand (no bedding)	medium moderately-sorted	60-90% moderately-sorted subrounded mixed	moderately hard	structureless	no horizon	C	groundwater	no	no	Terminated at desired depth.

Appendix C

Inadvertent Discovery Plan

South Renton Transit Center and Roadway Improvements Project Renton, King County, Washington Inadvertent Discovery Plan

March 2022

Table of Contents

1	Introduction	1
1.1	Project Description.....	1
1.2	Regulatory Environment	3
1.3	Archaeological Potential	7
2	Archaeological Resources Discovered During Construction.....	8
2.1	On-Site Staff Responsibilities.....	15
2.2	Project Management Responsibilities	15
3	Human Remains	17
3.1	On-Site Staff Responsibilities.....	17
3.2	Project Management Responsibilities	18
4	Construction Team Training, Communication, and Reporting	19
4.1	Tribal Notification	19
4.2	Preconstruction Meeting	19
4.3	Construction Crew Member Orientation	19
4.4	Ongoing Communication	20
4.5	Reporting of Inadvertent Discoveries	20
5	Archaeological Resources and Collection Curation	21
6	Contact Information	22
7	References	23

Figures

Figure 1. Area of Potential Effects and Area of Potential Ground Disturbance (Topographic Map)	5
Figure 2. Area of Potential Effects and Area of Potential Ground Disturbance (Aerial Photo)	6
Figure 3. Inadvertent Discovery Process for Archaeological Resources.....	14
Figure 4. Process for Discovery of Possible Human Remains	17

Appendices

Appendix A:
On-Site Inadvertent Discovery Guide

Inadvertent Discovery Plan

South Renton Transit Center and Roadway Improvements Project

March 2022

1 Introduction

This Inadvertent Discovery Plan (IDP) has been developed by Sound Transit for use during ground-disturbing activities for the South Renton Transit Center and Roadway Improvements (Project). This IDP describes the protocols to be followed by Project personnel if archaeological resources are discovered during ground-disturbing activities.

1.1 Project Description

The Project is located in Renton, King County, Washington in Sections 19, Township 23 North, Range 5 East, Willamette Meridian, on the Renton, Washington 7.5' series topographic map (Figure 1 and Figure 2).

The Project is a component of the I-405 Bus Rapid Transit (BRT) Project, which is being developed by Sound Transit, as envisioned and addressed by the I-405 Master Plan Environmental Impact Statement and Sound Transit's Long-Range Plan, to provide BRT service within the I-405 corridor for 37 miles between Lynnwood and Burien.

The South Renton Transit Center (SRTC) would be located on the north side of I-405, in the northwest corner of the intersection of South Grady Way and Rainier Avenue South (State Route 167). This new transit facility would be developed on an 8.3-acre site, which is currently comprised of four King County tax parcels (1923059035, 1923059063, 1923059068, and 1923059074) (Figure 2). Once the transit facility is constructed, some of the site could become surplus property available for future transit-oriented development (TOD). Work outside of the SRTC facility will be limited to the existing road right-of-way further detailed below.

Construction activities began in 2021 with the demolition of buildings located on the four Project parcels. Sound Transit anticipates the construction of the SRTC Parking Garage beginning within the next 13 years with a current buffer end date of 2034.

To access the South Renton Transit Center from I-405, BRT vehicles heading in a westerly direction (southbound) on I-405 would use the exit onto Rainier Avenue S into an existing northbound, curbside business access and transit (BAT) lane. BRT buses would stay in the existing BAT lane across S Grady Way along Rainier Avenue S. BRT vehicles heading in an easterly direction (northbound) on I-405 would access the South Renton Transit Center using the

existing exit onto Rainier Avenue S. To improve transit speed and reliability, northbound BRT vehicles would use a new short section of a bus-only, bus-on-shoulder lane on northbound Rainier Avenue S. that would be constructed starting at the existing southbound I-405 loop ramp and extending north approximately 200 feet north to connect with the existing BAT lane.

Once across S Grady Way, BRT vehicles heading northbound would turn right into the transit center's bus loop from a new signalized intersection at Rainier Avenue S and Hardie Avenue SW. This new intersection would also be the exit point for buses leaving the transit center and would be the primary ingress and egress location for the buses. Within this intersection, the existing raised, landscaped median in Rainier Avenue S would be removed to allow for turning movements, and crosswalks would be provided at each of the four roadway crossings. North of this intersection, the existing center median within Rainier Avenue S would be removed for a new southbound bus-only left-turn pocket that would allow buses to turn left into the transit center; a small section of a center median may remain at the southern end of the bus-only left-turn pocket. At the connection to Rainier Avenue S, Hardie Avenue SW would be reconstructed to realign the southbound lane adjacent to the northbound lane. This shift would require removing the northern portion of an existing raised, landscaped island. In place of the existing southbound lane on Hardie Avenue SW, a landscaped curb would be constructed, connecting with the remaining portion of the existing island. The new signal for this intersection will be included in this revised island and landscaped curve. For general-purpose traffic, the southbound lane on Hardie Avenue SW would be right-turn only. Buses on Hardie Avenue SW would be able to travel through the intersection into the transit center.

A secondary bus access into the transit center's bus loop would be from the east side of the site from Lake Avenue S. This secondary access would also provide connectivity to the bus bays and layover spaces at the existing South Renton Park-and-Ride located just east of the South Renton Transit Center. Access from Lake Avenue S provides bus circulation and access from S Grady Way, Shattuck Avenue S, and S 7th Street. Parking for operation and maintenance vehicles would be located in a pull off area that extends slightly south along the driveway that connects the park-and-ride garage to Lake Avenue S.

In the southern portion (adjacent to S Grady Way) and the eastern portion of the site (adjacent to Lake Avenue S) there is an existing Seattle City Light power line easement. Along the south boundary, the easement is approximately 100 feet wide. In the eastern portion of the site the easement is approximately 200 feet wide. Prior to the start of construction, Sound Transit would coordinate with the Seattle City Light, and utility providers as needed, to ensure construction activities would not interfere with their facilities and service. Once constructed, the transit facilities would not alter, affect, or interfere with this existing 240 kilovolt transmission line across the site. The easement area under the transmission lines would primarily be green space (where existing pavement would be removed) or would consist of ground-level improvements, such as the driveway to the park-and-ride garage off of Lake Avenue S and S Grady Way and the

eastern portion of the transit loop. In addition, the existing sculpture located at the northeast corner of the intersection of Rainier Avenue S and S Grady Way, adjacent to the southwest corner of the transit center site, would remain.

BRT vehicles leaving the South Renton Transit Center would turn left onto Rainier Avenue S into an existing, southbound curbside BAT lane and then onto either northbound or southbound I-405 using existing on-ramps. Signal-timing improvements would be made, including adding TSP to the traffic signal at the intersection of S Grady Way and southbound Rainier Avenue S and at Rainier Avenue S and SW 7th Street.

For construction of the South Renton Transit Center, the contractor would likely stage the necessary equipment and materials on the site. For construction of the bus-only bus-on-shoulder lane along Rainier Avenue S, the contractor may stage equipment and materials in the area to the east of Rainier Avenue S, within the existing, unpaved right-of-way for I-405. The site would be cleared and graded as needed for the proposed transit center features and to provide adequate drainage. During construction, pile driving may be required to construct the foundation of the park-and-ride garage.

Construction of this Project began in 2021 with the demolition of buildings within the APE.

1.2 Regulatory Environment

Sound Transit has received federal funds administered by the Federal Transit Administration (FTA) for the project. In addition, the Project would construct improvements on the National Highway System, which includes the Interstate System under the jurisdiction of the Federal Highways Administration (FHWA). The FTA has agreed to be the lead federal agency. The project is a federal undertaking and therefore subject to compliance with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. Section 106 requires that federal agencies consider the effects of undertakings on historic properties within the project's Area of Potential Effects (APE). Federal code implementing Section 106, found at 36 CFR 800, includes a requirement that an effort be made to identify historic properties. The APE was defined by FTA in coordination with Sound Transit and this APE has been included in consultation with the State Historic Preservation Officer (SHPO) as well as affected Tribes, including the Muckleshoot Indian Tribe, the Snoqualmie Tribe, the Stillaguamish Tribe of Indians, the Suquamish Tribe, the Tulalip Tribes, the Confederated Tribes and Bands of the Yakama Nation. The APE includes work in four King County tax parcels (1923059035, 1923059063, 1923059068, and 1923059074), as well as Washington State Department of Transportation Right of Way in Section 19 of Township 23 North, Range 05 East. The APE for the project is shown in Figure 1 and Figure 2.

Sound Transit and FTA are responsible for ensuring that the Project complies with state and federal laws, including:

- Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800
- Revised Code of Washington (RCW) 27.44, 27.53, 68.50, and 68.60
- Washington Administrative Code 25-48

Environmental Science Associates (ESA) conducted a Cultural Resources Assessment of the APE in 2022 (Lockwood and Schneider 2022). This assessment included a literature review, pedestrian reconnaissance of the APE performed in 2019, and geoarchaeological borings conducted in July 2021. Archival review indicates that the APE contains no previously recorded ethnographic place names, archaeological sites, cemeteries, or traditional cultural properties. Four historic-aged built environment resources are located within the APE, two of these have been demolished for the SRTC, the remaining two are located adjacent to the Area of Potential Ground Disturbance (APGD). The area encompassing the historic Black River floodplain is well-known for containing significant precontact-era archaeological sites. The APE is situated on this floodplain and is underlain by Holocene-aged alluvial sediments with the potential to contain buried, intact precontact archaeological sites. However, important precontact village and camp sites, including 45KI51 (sba'badi'd), 45KI59 (Tualdad Altu), and 45KI501 and 45KI1010 (Renton High School Site and Renton High School Ball Field Site), are located either along the incised old channel of the Black River, or near the confluence of the Black River and Cedar River. Compared to the APE, these locations offered permanent fresh water and canoe access, and probably a greater amount and diversity of subsistence resources. As a result, precontact archaeological sites, if present within the APE, could be expected to be relatively ephemeral manifestations related to temporary or short-term subsistence activities. Pedestrian reconnaissance confirmed that the APE has been heavily altered by previous infrastructure development.

The assessment recommended that Sound Transit prepare an IDP for project construction. This IDP describes procedures that will be followed if archaeological resources or human remains are encountered during ground-disturbing construction, in compliance with applicable state and federal laws.

Figure 1. Area of Potential Effects and Area of Potential Ground Disturbance
(Topographic Map)

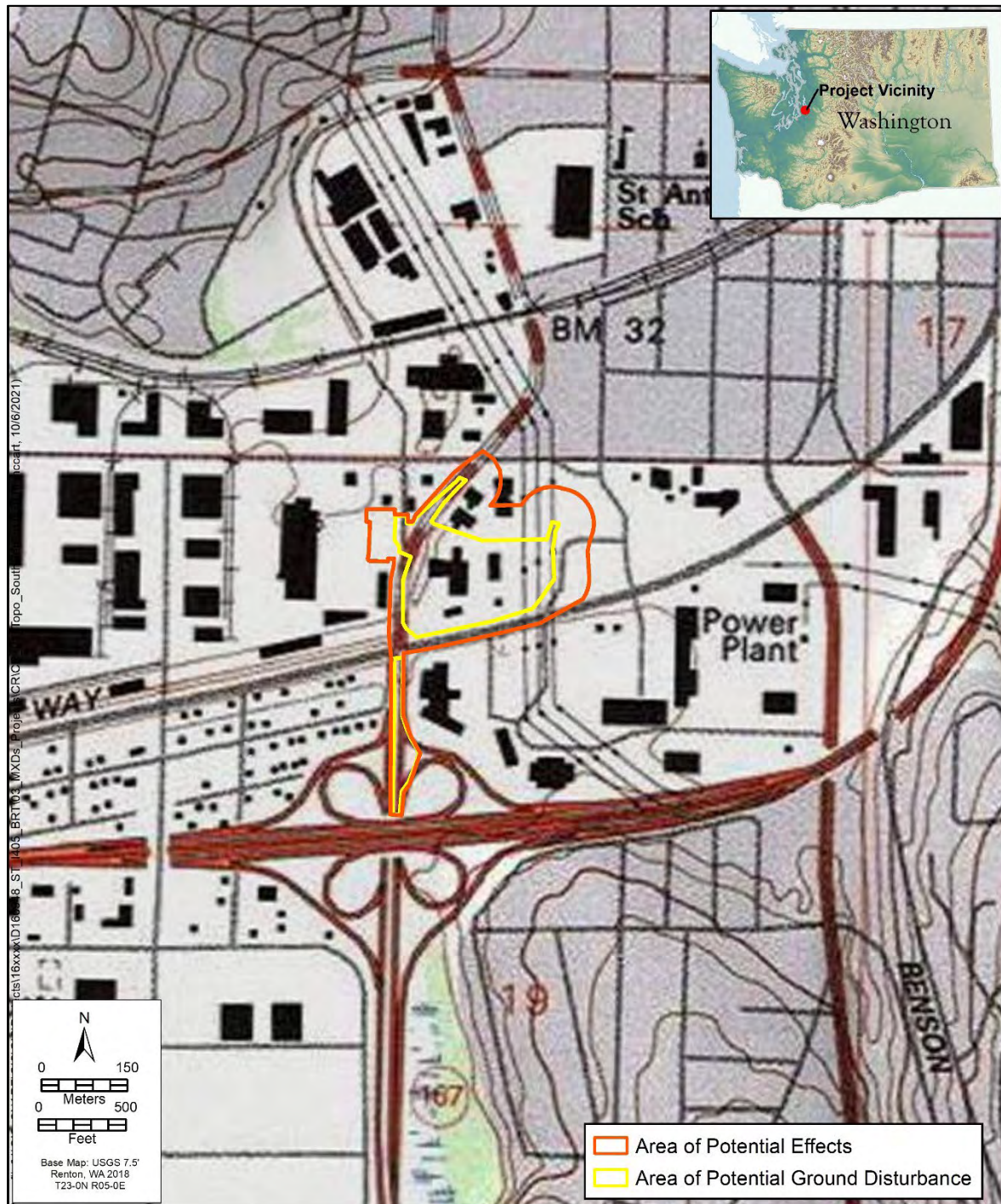
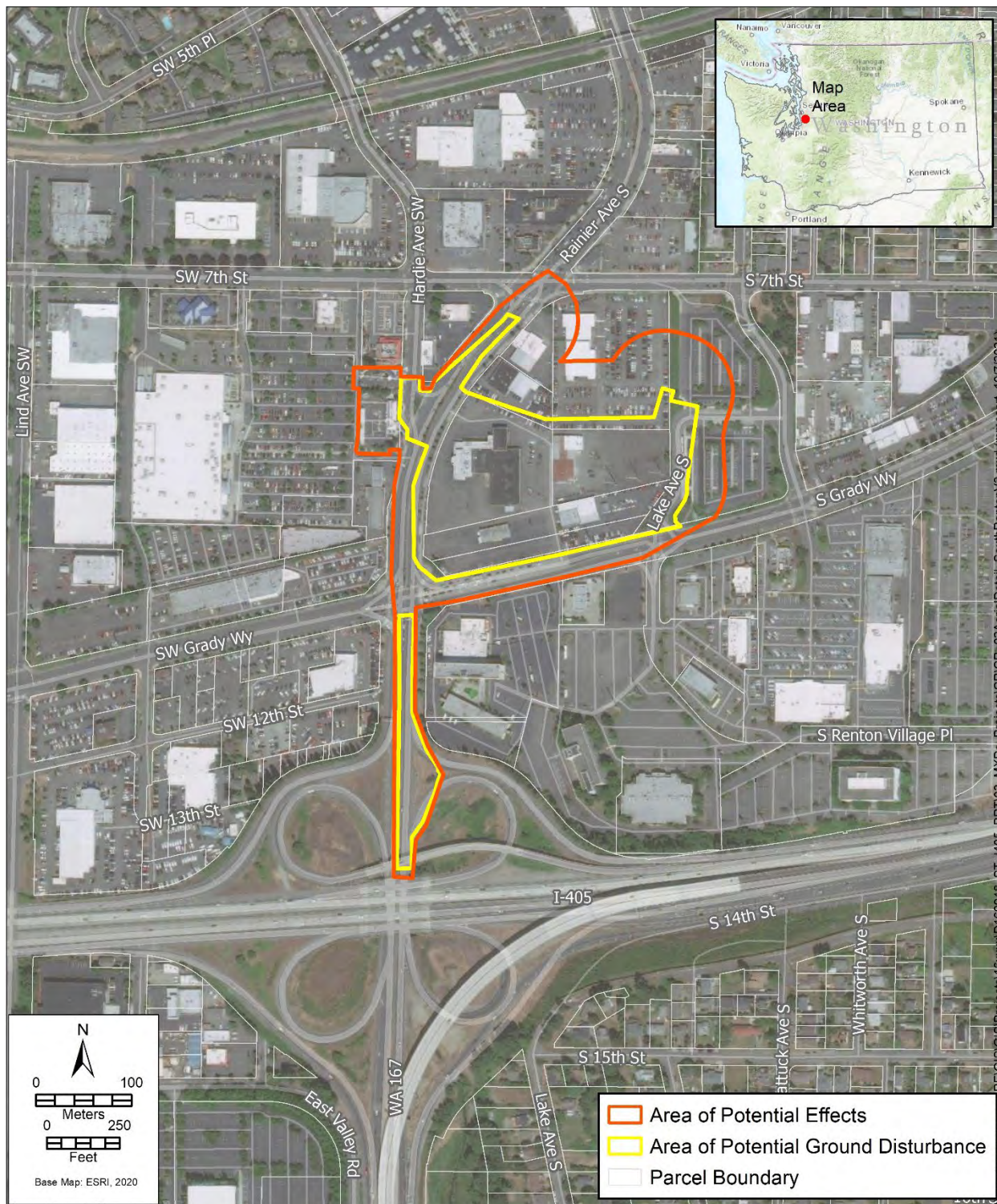


Figure 2. Area of Potential Effects and Area of Potential Ground Disturbance (Aerial Photo)



1.3 Archaeological Potential

A reconnaissance-level cultural resources assessment was conducted in 2021 for the APE (Lockwood and Schneider 2022). The APE is situated on the historic, pre-1916 floodplain of the Black River. Before 1916, Lake Washington drained into the Black River, which flowed westward to the White (now Green) River, while the Cedar River flowed just south of its current position and was a tributary to the Black River (Mullineaux 1970; Palmer 1992). After the Lake Washington Ship Canal was completed in 1916, the lake level dropped approximately 9 feet within a month, and the outlet to the Black River was blocked (Chrzastowski 1983). Later, the Cedar River was channelized and redirected from the Black River into the lake (Mullineaux 1970; Palmer 1992). Deprived of water from both Lake Washington and the Cedar River, the Black River effectively ceased to flow.

Geological mapping indicates the APE is underlain by Holocene-aged alluvial sediments. The APE is situated approximately 0.20 miles southeast of the historic course of the Black River. Given its distance from the historic channel, the APE would be expected to contain significant quantities of fine-grained alluvium (fine sand, silt and clay) deposited as a result of overbank flooding from the Black River.

The South Renton Transit Center location is within an area that has been extensively developed and urbanized and is currently for car sales and repair businesses. Very few non-paved areas exist, and these are confined to small grass and planting strips. This area has been at least superficially graded flat for use as parking area as well as extensively disturbed at the location of multiple buildings. Buried utilities are prevalent along the street margins as well as occasionally extending across the site, feeding multiple buildings and light poles. Large aboveground power lines are located at the southern end (oriented east/west), as well as along the eastern end (oriented north/south). The area appears to be at or near the historic/native ground surface (no major grade changes with neighboring properties), but is almost completely paved. Based on results of the pedestrian survey, Sound Transit and ESA determined that traditional subsurface survey was not feasible.

2 Archaeological Resources Discovered During Construction

On-site staff will follow the procedures described below and illustrated in Figure 3. The contact phone tree and examples of archaeological resources are provided in Appendix A - On-Site Inadvertent Discovery Guide.

An archaeological resource could be precontact or historic. When in doubt, assume the material is an archaeological resource.

Examples of precontact archaeological materials include:

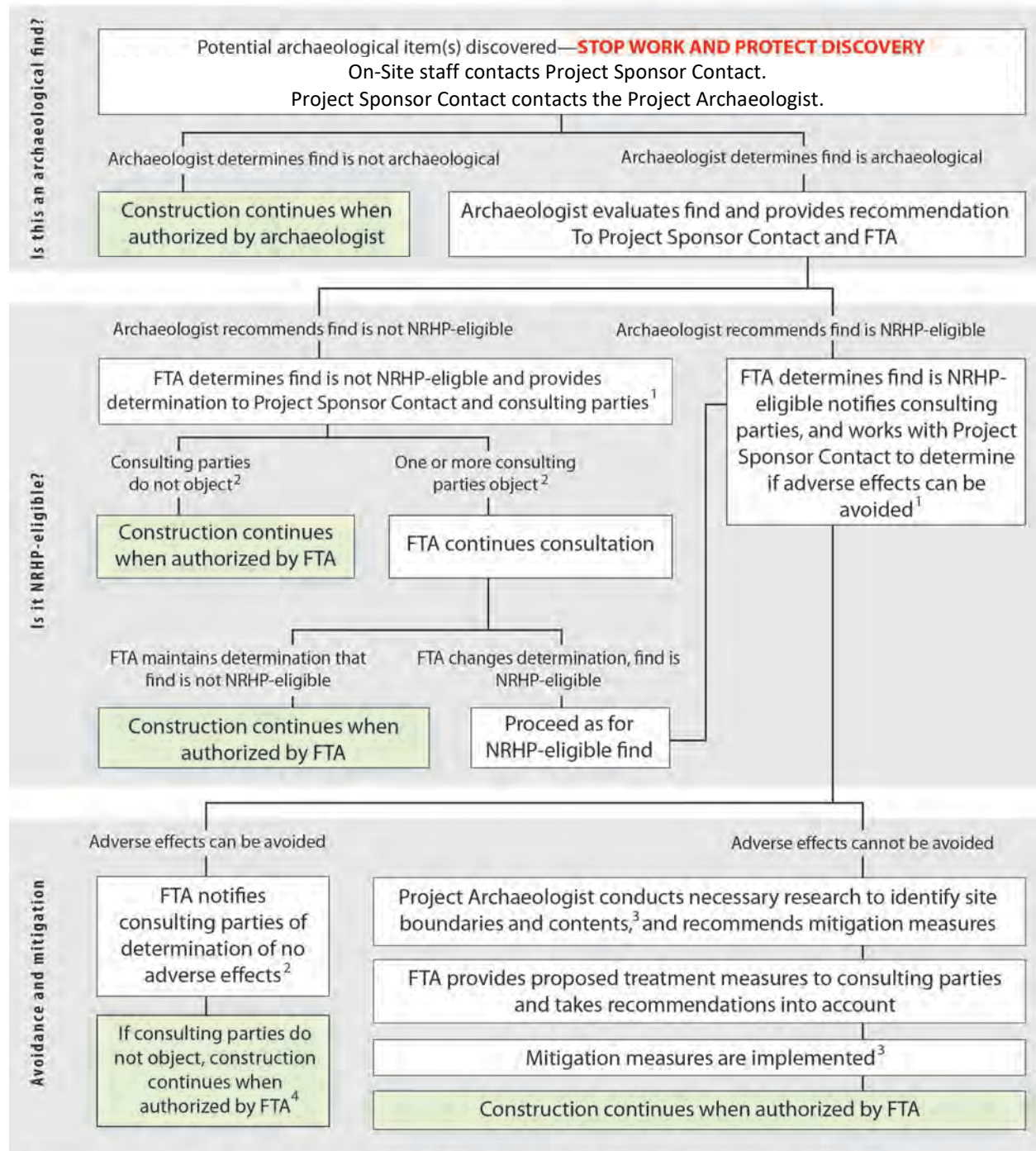
- An accumulation of shell, burnt rocks, or other food-related materials
- Bones or small pieces of bone
- An area of charcoal or very dark stained soil with artifacts
- Stone tools or waste flakes (i.e., an arrowhead or stone chips)
- Basketry, cordage, or rope
- Wooden posts or stakes

Examples of potentially historic archaeological materials include:

- Domestic ceramics (such as tableware, crockery, etc.) and industrial ceramics (such as insulators, tile, etc.)
- Glass, including bottles, tableware, window glass, wire glass, or multiple glass fragments
- Metal items, including equipment, vehicle parts, agricultural items, enameled ironware, etc.
- Bakelite, celluloid, glass, and shell buttons
- Punch-opened and solder-sealed beverage cans, solder-sealed food tins, general lack of thin-walled aluminum and welded steel cans
- Residential structural remains, such as historic building foundations or privies

NOTE: Items made of plastic, polystyrene, nylon, or Styrofoam, or those with modern markings (e.g., candy wrappers, or bottles and cans recognizable as modern) are not archaeological resources and do not constitute an inadvertent discovery.

Figure 3. Inadvertent Discovery Process for Archaeological Resources



1 Consulting parties must be notified within 48 hours of an archaeological discovery (36 CFR Part 800.13(b)3).
 2 Consulting parties have 48 hours to respond to agency determinations regarding discoveries (36 CFR Part 800.13(b)3).
 3 In Washington, a permit is not required if the archaeological work is for Section 106 compliance.
 4 If one or more consulting parties object, consultation continues until FTA determines that a reasonable and good faith effort has been made to resolve issues.

2.1 On-Site Staff Responsibilities

The following section describes the steps to follow if an on-site Sound Transit employee, contractor, or subcontractor believes that they have uncovered a potential archaeological resource (a find) at any point in the Project.

1. **Stop Work:** All work on-site and in areas adjacent to the find will stop. The area of work stoppage will be adequate to protect the find from any further disturbance; this is expected to be 30 feet in any direction, unless site conditions indicate otherwise. The location of the find will be secured at all times. The find will not be handled, removed, reburied, or covered. The Contractor will install a physical barrier (e.g., exclusionary fencing) and prevent all machinery, other vehicles, and unauthorized individuals from crossing the barrier until the Project Archaeologist examines and verifies the find. Vehicles, equipment, and unauthorized personnel will not be permitted to traverse the discovery area. Spoils piles or vehicles (such as dump trucks) with the potential to contain archaeological resources will remain on-site. Work at the location of the find will not resume until authorized by FTA.
2. **Notify Project Management:** The Sound Transit site representative will contact Alex Stevenson, Sound Transit Cultural Resources Program Manager. If Alex Stevenson is not available, contact Kathy Fendt, Sound Transit Environmental Planner.
3. **Avoid Any Other Communication:** Do not call 911, the media, or members of the public about the find.

IDP Terminology

A **find** is a discovery during construction that could potentially be an archaeological resource.

An **archaeological resource** is an artifact or feature (or group of artifacts or features) older than 50 years.

An **NRHP-eligible archaeological resource** is one that has been evaluated and meets the criteria for listing in the National Register of Historic Places (NRHP).

2.2 Project Management Responsibilities

1. **Contact the Project Archaeologist:** Alex Stevenson or Kathy Fendt will contact the Project Archaeologist to evaluate whether the find is an archaeological resource as defined by state or federal law. If the Project Archaeologist recommends that the find is not an archaeological resource, Sound Transit can authorize work to continue.
2. **Determine Area Adequate for Protection:** If the Project Archaeologist recommends that the find is an archaeological resource, the Project Archaeologist will determine the area and the means adequate for protection and instruct the Contractor to maintain or adjust the protected area accordingly.
3. **Notify Consulting Parties:** Alex Stevenson will notify FTA of the discovery of an archaeological resource. FTA shall notify consulting parties (State Historic Preservation

Officer [SHPO], tribes, and any other identified interested parties) of the find within 48 hours, per 36 CFR Part 800.13.

4. **Research to evaluate NRHP-Eligibility:** The Project Archaeologist will conduct any additional research necessary to evaluate National Register of Historic Places (NRHP) eligibility of the archaeological resource. Based on this research, the Project Archaeologist will recommend to FTA and Sound Transit whether the archaeological resource is NRHP-eligible.
5. **Formally Determine NRHP-Eligibility and Continue Consultation:** FTA shall determine whether the archaeological resource is NRHP-eligible and shall provide the determination to consulting parties. Consulting parties shall respond within 48 hours, per 36 CFR Part 800.13.

If FTA determines that the archaeological resource is not NRHP-eligible and consulting parties do not object within 48 hours, construction may continue when authorized by FTA. If any consulting party objects, FTA shall continue consultation with all consulting parties in good faith to resolve the lack of agreement. If agreement cannot be reached, FTA shall seek comment from the Advisory Council on Historic Preservation, as described in 36 CFR Part 800.4(c)(2).

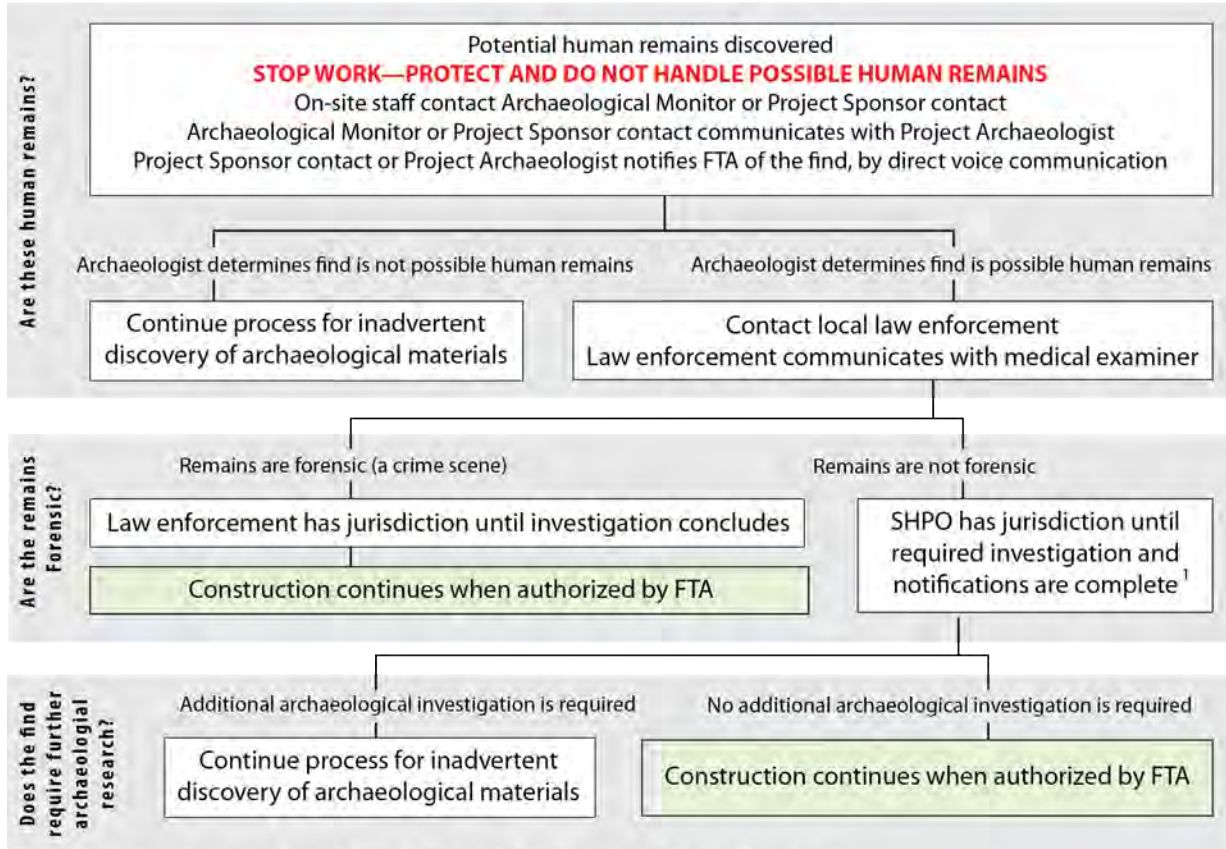
6. **Avoid or Mitigate Adverse Effects:** If FTA determines that the archaeological resource is NRHP-eligible, FTA will work with Sound Transit to determine whether adverse effects can be avoided. If adverse effects can be avoided, FTA shall provide documentation of avoidance and a determination of No Adverse Effect to consulting parties. If consulting parties do not object within 48 hours, construction may continue when authorized by FTA. If any consulting party objects, FTA shall continue consultation with all consulting parties in good faith to resolve the lack of agreement. If agreement cannot be reached, FTA shall seek comment from the Advisory Council on Historic Preservation, as described in 36 CFR Part 800.4(c)(2).

If FTA determines that adverse effects cannot be avoided, FTA will work with Sound Transit and consulting parties to develop mitigation measures. These measures could include an Archaeological Treatment Plan that describes data recovery efforts, or other mitigation measures.

3 Human Remains

On-site staff will follow the procedures described below and illustrated in Figure 4. Uncovered human remains on the project construction site require special treatment under RCW 68.50.645. Any potential remains that are encountered during Project work should be assumed to be human until determined otherwise by the Project Archaeologist or the King County Medical Examiner.

Figure 4. Process for Discovery of Possible Human Remains



¹ Notification requirements depend, in part, on whether the remains are Native American.

3.1 On-Site Staff Responsibilities

1. **Stop Work:** If any Sound Transit employee, contractor, or subcontractor believes that possible human remains have been uncovered at any point in the Project, all work on-site and in areas adjacent to the discovery will stop. The area of work stoppage will be adequate to protect the discovery, which is expected to be a minimum of 30 feet in all directions, unless the Project Archaeologist or law enforcement personnel indicate otherwise.

2. **Do Not Handle Human Remains:** Possible human remains shall not be handled, removed, reburied, or covered.
3. **Flag and Secure the Area:** The area of discovery will be flagged and secured. The location of the discovery will be secured at all times. Construction equipment and personnel will not enter the area. Spoils piles or vehicles from the area that have the potential to contain human remains, such as dump trucks, will remain on-site. No persons other than the proper law enforcement personnel, the King County Medical Examiner, and professional archaeologists will be authorized to access the discovery location after the area is secured.
4. **Notify Project Management:** The Sound Transit site representative will contact Alex Stevenson, Sound Transit Cultural Resources Program Manager. If Alex Stevenson is not available, contact Kathy Fendt, Environmental Manager, Sound Transit.
5. **Avoid Any Other Communication:** Do not call 911, the media, or members of the public about the find.

3.2 Project Management Responsibilities

1. **Preliminary Observation:** Alex Stevenson will notify FTA (via phone) of the discovery, and will coordinate with the Project Archaeologist to assess whether the discovery may be human remains (without disturbing the discovery further). If the discovery can be definitively identified as nonhuman, procedures for archaeological resources will be followed.
2. **Notify Local Law Enforcement and Medical Examiner:** If the discovery could possibly be human remains, Alex Stevenson or Kathy Fendt shall call the Renton Police Department non-emergency number and report that potential human remains have been discovered. The Renton Police Department will control the discovery site until it is either determined to be non-forensic (not a crime scene) or the investigation is complete.
3. **Participate in Consultation:** FTA and Alex Stevenson, Sound Transit Cultural Resources Program Manager, will participate in consultation. If there are also archaeological materials at the human remains discovery location, there may be a parallel archaeological resources process led by FTA. Construction can resume when authorized by FTA and SHPO.

4 Construction Team Training, Communication, and Reporting

The following discussion outlines communication protocols to resolve any archaeological resource matters that arise during project construction. A project contact list is provided in the back of this document.

4.1 Tribal Notification

Sound Transit will notify tribal representatives via email of the project schedule and invite them to the preconstruction meeting and to observe construction.

4.2 Preconstruction Meeting

A preconstruction meeting will be held for the Project Archaeologist, Construction Management Lead, Resident Engineer, Contractor's project manager, Project Superintendent, and other personnel responsible for overseeing ground-disturbing field operations to:

- Review construction plans and schedules;
- Establish a chain of command for communication and decision-making among Sound Transit, the Project Archaeologist, and construction personnel;
- Review IDP procedures;
- Provide introductions of the Sound Transit representatives, the Project Archaeologist, and other personnel;
- Describe the role of the Project Archaeologist;
- Clarify questions about stop-work and notification procedures;
- Provide a copy of the On-Site Inadvertent Discovery Guide (Appendix A) to field staff providing oversight of ground-disturbing work.

The preconstruction meeting will occur prior to any ground-disturbing activity. Additional meetings will be scheduled if there is substantial staff turnover, concern about staff understanding the protocols, a long break in construction, or a desire for refresher training on policy. The Project Archaeologist will remain in contact with Alex Stevenson, Sound Transit Cultural Resources Program Manager, throughout the Project to determine if site visits, additional meetings, or orientations are needed.

4.3 Construction Crew Member Orientation

The Project Archaeologist may provide on-site cultural resources orientation for all construction crew members leading ground-disturbing construction work. Orientation will inform and familiarize construction personnel with the IDP protocols and their responsibility to call attention to any archaeological materials they observe. The Sound Transit Cultural Resources Program

Manager will coordinate with the Project Archaeologist to provide a brief orientation to construction crew members, as appropriate.

4.4 Ongoing Communication

The Sound Transit staff, contractor, and its agents will abide by established communication protocols described in the inadvertent discovery processes in Sections 2 and 3 regarding any archaeological resource matters that arise during construction. The Project Archaeologist will remain in communication with the Sound Transit Cultural Resources Program Manager, as appropriate, throughout project construction, via email and phone.

4.5 Reporting of Inadvertent Discoveries

The responsibilities of the project team include assessments of any inadvertent discoveries and a summary of results at the conclusion of construction. Reports regarding assessments of any inadvertent discoveries will be provided by Sound Transit to FTA for review before submission to consulting parties. For all reporting, sensitive information regarding archaeological resources, human remains, funerary objects, or traditional practices shall not be released except as authorized by FTA under applicable state and federal laws.

The Project Archaeologist will be responsible for preparing an assessment of all inadvertent discoveries of archaeological resources during construction. The assessment will be used by FTA and SHPO to determine Section 106 eligibility and effects determinations and inform any additional coordination or investigation that may be necessary. The assessment will be prepared within 24 hours of an inadvertent discovery and can be provided to FTA in a memorandum or email. It will include the following information:

- 1) A description of the find, in enough detail to characterize its features and age. The description should include at least one photograph of the find.
- 2) A description and map of where the find occurred, including its context with adjacent features. The location of the find should be identified on a map that also identifies other known historic properties, if relevant.
- 3) Whether or not the find is an archaeological resource.
- 4) For archaeological resources, a recommendation of NRHP-eligibility that includes a statement of the age of the find, evaluation of find against each NRHP criterion, and a description of the integrity of the find.

5 Archaeological Resources and Collection Curation

No artifact shall be removed or taken by any construction crew member, regardless of archaeological significance or the disposition of the artifact. If a NRHP-eligible resource is encountered and the subsequent Archaeological Treatment Plan includes excavation or removal of the archaeological materials, the plan will specify collection and curation requirements for both artifacts and associated records. If artifacts are removed from the site for analysis and determined Not Eligible, the Project Archaeologist will dispose of the material at the direction of Sound Transit and FTA. Any artifacts removed from the site for analysis will be stored in a secure location at the Project Archaeologist's offices and regularly monitored for condition until an eligibility determination is made and a final disposition is determined.

6 Contact Information

<p>Sound Transit (Project Sponsor Contact)</p> <p>Primary Contact: Alex Stevenson Title: Cultural Resources Program Manager Office: 206-553-3655 Cell: 206-419-5315 Email: alex.stevenson@soundtransit.org</p> <p>Alternate Contact: Kathy Fendt Title: Environmental Manager Cell: 425-681-5505 Email: kathy.fendt@soundtransit.org</p>	<p>Renton Police Department Non-Emergency Number: 425-430-7500</p>
	<p>King County Medical Examiner Richard Harruff, M.D, PhD, Chief Medical Examiner: Office: 206-731-3232 ext. 5</p>
	<p>Tulalip Tribes Primary Contact: Richard Young Title: Cultural Resources Manager Office: 360-716-2652 Cell: 425-239-0182 Email: ryoung@tulaliptribes-nsn.gov</p>
<p>Federal Transit Administration Primary Contact: Mark Assam Title: Environmental Protection Specialist Cell: 206-220-4465 Email: mark.assam@dot.gov</p>	<p>Snoqualmie Indian Tribe Primary Contact: Steven Mullen-Moses Title: Director, Archaeology and Historic Preservation Office: 425-292-0249 ext 2010 Cell: 425-495-6097 Email: steve@snoqualmietribe.us</p>
	<p>Muckleshoot Indian Tribe Primary Contact: Laura Murphy Title: Archaeologist, Cultural Resources Office: 253-876-3272 Email: laura.murphy@muckleshoot.nsn.us</p>
<p>Project Archaeologist Primary Contact: Matthew Sterner Cell: 360-480-8822 Email address: Matthew.Sterner@jacobs.com</p>	<p>Stillaguamish Tribe of Indians Primary Contact: Kerry Lyste Title: Tribal Historic Preservation Officer Office: 360-652-7362 ext.226 Email: lyste@stillaguamish.com</p>
	<p>Suquamish Tribe Primary Contact: Denis Lewarch Title: Tribal Historic Preservation Officer Office: 360-394-8529 Email: dlewarch@suquamish.nsn.us</p>
<p>State Historic Preservation Office</p> <p>Primary Contact: Dennis Wardlaw Title: Transportation Archaeologist Cell: 360-485-5014 Email: Dennis.Wardlaw@dahp.wa.gov</p>	<p>Confederated Tribes and Bands of the Yakama Nation Primary Contact: Kate Valdez Title: Tribal Historic Preservation Officer Office: 509-865-1068 Email: kate@yakama.com</p>

7 References

Chrzastowski, M.J.

- 1983 Historical changes to Lake Washington and route of the Lake Washington Ship Canal, King County, Washington. U.S. Geological Survey Water-Resources Investigations Report 81-1182.

Lockwood, Chris, and Chanda R. Schneider

- 2022 *South Renton Transit Center Project Cultural Resources Assessment, Renton, King County, Washington*. Prepared by ESA for Sound Transit. On file, Sound Transit.

Mullineaux, D.E.

- 1970 *Geology of the Renton, Auburn, and Black Diamond quadrangles, King County, Washington*. U.S. Geological Survey Professional Paper 672. USGS, Reston, Virginia.

Palmer, S.P.

- 1992 *Preliminary Maps of Liquefaction Susceptibility for the Renton and Auburn 7.5' Quadrangles, Washington*. Open File Report 92-7. Washington Division of Geology and Earth Sciences, Olympia.

Appendix A: On-Site Inadvertent Discovery Guide

South Renton Transit Center and Roadway Improvements Project On-Site Inadvertent Discovery Protocols for Archaeological Materials and Human Remains

This information assists on-site personnel in implementing procedures described in the Inadvertent Discovery Plan, in compliance with applicable state and federal laws.

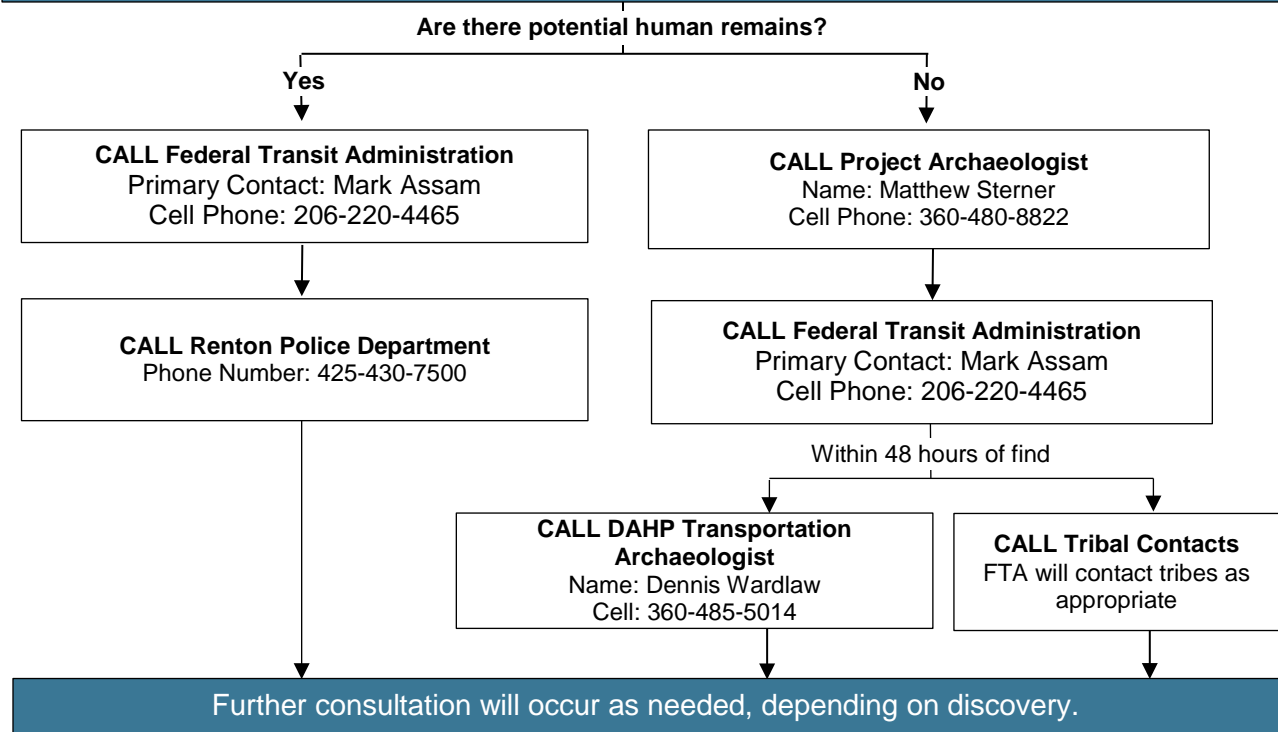
Contact Phone Tree—Potential archaeological resources encountered

On-site personnel stop all work within 30 feet of the discovery, unless conditions indicate otherwise. Work stoppage area will be adequate to protect the discovery.

CALL Sound Transit
Primary Contact: Alex Stevenson,
 Cultural Resources Program Manager
 Cell Phone: 206-419-5315
Alternate Contact: Kathy Fendt,
 Environmental Manager
 Cell Phone: 425-681-5505

STOP. On-site personnel do not make any further contacts.

Project Sponsor Contact makes all remaining contacts, in the order shown below.



Examples of Archaeological Resources



Layers of Shell



Burnt Soil (Hearth)



Burnt Rock Feature (Hearth)



Bone



Basketry



Flaked Stone Tool



Flaked Stone Tool



Stone Tool-Making Debris



Historic Cellar



Historic Utility Feature



Historic Artifact Scatter



Historic Artifacts

Appendix D

Historic Property Inventory

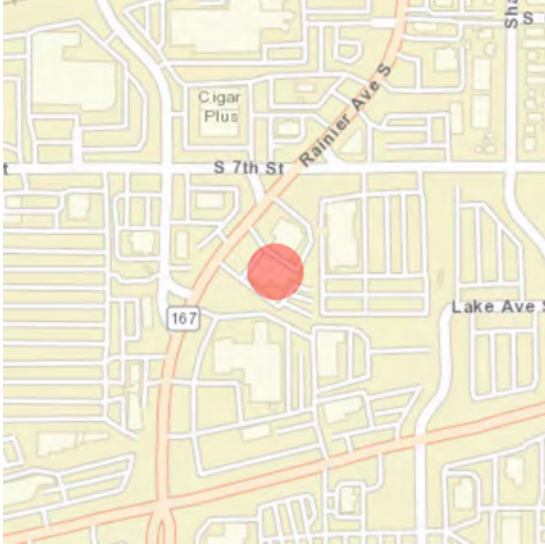
Completed by ESA for DAHP Project ID 2021-07-04474

Historic Property Report

Resource Name: commercial building

Property ID: 343450

Location



Address: 720 Rainier Ave S, Renton, Washington, 98057
Tax No/Parcel No: 1923059053
Plat/Block/Lot: LOT 1 OF RENTON LLA #LUA-02-025- LLA REC #20020515
Geographic Areas: King County, RENTON Quadrangle, T23R05E19

Information

Number of stories: N/A

Construction Dates:

Construction Type	Year	Circa
Built Date	1965	<input type="checkbox"/>
Remodel	1972	<input type="checkbox"/>
Remodel	1990	<input checked="" type="checkbox"/>
Remodel	2002	<input checked="" type="checkbox"/>

Historic Use:

Category	Subcategory
Commerce/Trade	Commerce/Trade - Business
Transportation	Transportation - Road-Related (vehicular)
Commerce/Trade	Commerce/Trade - Business
Transportation	Transportation - Road-Related (vehicular)



Historic Property Report

Resource Name: commercial building

Property ID: 343450

Historic Context:

Category

Architecture

Commerce

Transportation

Architect/Engineer:

Category

Name or Company

Builder

Baugh Construction

Thematics:

Local Registers and Districts

Name

Date Listed

Notes

Project History

Project Number, Organization, Project Name	Resource Inventory	SHPO Determination	SHPO Determined By, Determined Date
2011-07-00111, , Assessors Data Project: King County E	7/3/2011	Not Determined	
2017-11-07927, , Sound Transit I-405 BRT	12/9/2019	Not Determined	Holly Borth, 7/28/2021
2021-07-04474, , South Renton Transit Center Site Building Demolition Project	7/28/2021	Determined Not Eligible	Holly Borth, 7/28/2021
2021-07-04474, , South Renton Transit Center Site Building Demolition Project	7/28/2021	Determined Not Eligible	Holly Borth, 7/28/2021

Photos



720 Rainier Ave S_2019_NE.jpg



720 Rainier Ave S_unknown_NE.jpg



720 Rainier Ave S_2019_SE.jpg



720 Rainier Ave S_1972_NE.jpg



720 Rainier Ave S_1965_NE.jpg



Historic Property Report

Resource Name: commercial building

Property ID: 343450

Inventory Details - 7/3/2011

Common name:

Date recorded: 7/3/2011

Field Recorder: Artifacts Consulting, Inc.

Field Site number: 1923059053

SHPO Determination

Detail Information

Characteristics:

Category	Item
Form Type	Commercial

Surveyor Opinion

Significance narrative: Data included on this historic property inventory form (HPI) detail stemmed from County Assessor building records imported by the Washington State Department of Archaeology of Historic Preservation (DAHP) into WISAARD in 2011. This upload reduces data entry burden on community volunteers and historical societies participating in the survey and inventory of their communities. The intent of this project is directed specifically to facilitating community and public involvement in stewardship, increasing data accuracy, and providing a versatile planning tool to Certified Local Governments (CLGs).

Project methodology entailed use of the University of Washington's State Parcel Database (<http://depts.washington.edu/wagis/projects/parcels/development.php>) to provide the base parcel layer for CLGs. Filtering of building data collected from each county trimmed out all properties built after 1969, as well as all current, previously inventoried properties. Translation of building data descriptors to match fields in HPI allowed the data upload. Calculation of point locations utilized the center of each parcel. Data on this detail provides a snapshot of building information as of 2011. A detailed project methodology description resides with DAHP. Project team members: Historic Preservation Northwest, GeoEngineers, and Artifacts Consulting, Inc. (project lead).

Physical description: The building at 720 Rainier Avenue S, Renton, is located in King County. According to the county assessor, the structure was built in 1965 and is a commercial business. Also according to the county assessor, the structure was remodeled in 1990. The 1-story building has a commercial form.



Historic Property Report

Resource Name: commercial building

Property ID: 343450

Inventory Details - 12/9/2019

Common name: Walker's Renton Mazda
Date recorded: 12/9/2019
Field Recorder: Alta Cunningham and Johanna Kahn
Field Site number: Building 1 - Showroom
SHPO Determination

Detail Information

Characteristics:

Category	Item
Foundation	Concrete - Poured
Form Type	Commercial
Cladding	Concrete - Block (cmu)
Cladding	Concrete
Plan	Rectangle
Roof Type	Flat with Parapet
Roof Material	Asphalt/Composition - Built Up

Surveyor Opinion



Historic Property Report

Resource Name: commercial building

Property ID: 343450

Significance narrative: In a report documenting the history of auto dealerships in Seattle from 1900-1969, it was noted by the 1960's dealerships were moving away from the Seattle core and by the 1980s most of the auto-rows had moved to the northern and southern ends of the city (Weaver et al. 2019). When built, the property initially housed an appliance store, it's connection to the auto industry came in a second wave remodel by the late 1960s. Research did not reveal any associations with significant events, and the property is recommended not eligible under Criterion A. The property was originally occupied by Poole's appliance store, followed by various automotive-related business, including Toyota, Subaru, Mazda, and recreational vehicle dealerships. There are no known associations with significant people or businesses, and the building is recommended not eligible under Criterion B. The architect of the property is unknown, the contractor is listed as Baugh Construction. Baugh Construction founded by Lawrence and R. H. Baugh was active from 1946 to 2000 when they were aquired by Skanska (PCAD 2020). The company constructed several buildings throughout the greater Seattle area including the Bricklayers, Masons and Plasterers' International Union, Local No. 2, Hall, Southcenter Mall, and Seattle University Student Center, First Hill, Seattle (PCAD 2020; Seattle Times). Though the company constructed several notable buildings throughout Seattle this resource is not considered to be the work of a master (PCAD 2020; Vinluan 2000) .

As an extensively altered example of a common commercial building type, the property does not possess the distinctive characteristics of its type, period, or method of construction. For these reasons it is recommended not eligible under Criterion C. Construction details about the existing building have been documented. Because it is not likely to yield any additional important information about our history, the property is recommended not eligible under Criterion D. The property remains on the site where it was originally constructed and retains integrity of location. The vicinity is characterized by commercial uses and large paved parking lots, and the property retains integrity of setting and feeling. The property has been extensively altered over time, and it does not retain integrity of design, materials, or workmanship. As explained above, the building is not significantly associated with important events or people, and it therefore does not possess integrity of association. For these reasons, the property does not retain sufficient integrity in order to convey its historic identity.

For a property to be eligible for listing in the NRHP, it must be significant and possess integrity. Because the subject property retains integrity but lacks significance, it is recommended not eligible for listing in the NRHP.



Historic Property Report

Resource Name: commercial building

Property ID: 343450

Physical description: The building at 720 Rainier Avenue S, Renton, is located in King County, south of S 7th Street. The county assessor lists the construction date as 1965.

The building is rectangular in plan and has a footprint measuring 91 by 60 feet, with the shorter dimension parallel to 196th Street SW. The heavy entablature overhangs the western and southern façades of the building by 8 feet. The western and southern façades are comprised of a series of tall plate-glass windows with transoms. The western façade contains a slightly recessed concrete column, which mimics a large chimney. Two sets of double-glass doors are also located on the western façade.

The building has been altered since its 1965 construction; the materials and accents to the entablature were frequently changed. In 1972, a 25-by-30-foot canopy was constructed off of the western façade; it was removed between 2002 and 2006 (NetrOnline 2019). The faux-chimney was likely constructed in the 1990s; historic photos included in the property records do not show the feature in the 1980s; however, it is visible in 2004.

Bibliography:

King County Assessor
1965-1997 King County Historic Property Records. On file, Washington State Archives, Puget Sound Regional Branch, Bellevue, WA
2019 Assessor's Data Report for Parcel 192305-9053. Electronic document, <https://blue.kingcounty.com/Assessor/eRealProperty/Dashboard.aspx?ParcelNbr=1923059053>, accessed December 6, 2019.

McAlester, Virginia Savage
2015 *A Field Guide to American Houses*. Second Edition. Alfred A. Knopf, New York.

NetrOnline
2019 Historic Aerial Viewer: 1968, 1980, 1990, 2002, 2006. Available at, <https://www.historicaerials.com/viewer>, accessed December 13, 2019.

Pacific Coast Architectural Database (PCAD)
2020 Baugh Construction Company, electronic document, <http://pcad.lib.washington.edu/firm/2880/>, accessed March 23, 2020.

Vinluan, Frank
2000 "Larry Baugh was a builder of malls and landmarks". Electronic document, <https://archive.seattletimes.com/archive/?date=20000918&slug=4043119>, accessed March 23, 2020.

Weaver, Lindsey, Christine Becker, Heather Lee Miller, and Jordan Pickerell
2019 *Along the Row: The Growth of Seattle's Auto Dealerships from 1900 -1969*. Prepared by Historical Research Associates, Seattle. On file, ESA, Seattle.



Historic Property Report

Resource Name: commercial building

Property ID: 343450

Inventory Details - 7/28/2021

Common name:

Date recorded: 7/28/2021

Field Recorder: Holly Borth

Field Site number:

SHPO Determination

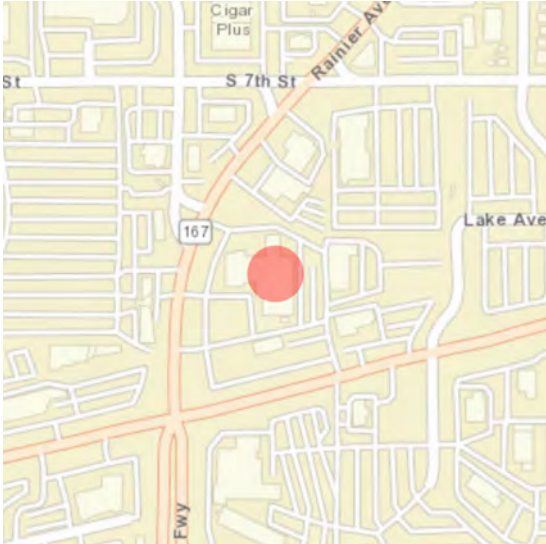


Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411

Location



Address: 750 Rainier Ave S, Renton, WA, 98057, USA

Tax No/Parcel No: 1923059035

Geographic Areas: King County Certified Local Government, King County, T23R05E19, RENTON Quadrangle

Information

Number of stories: N/A

Construction Dates:

Construction Type	Year	Circa
Built Date	1968	<input type="checkbox"/>
Addition	1991	<input type="checkbox"/>

Historic Use:

Category	Subcategory
Commerce/Trade	Commerce/Trade - Business
Commerce/Trade	Commerce/Trade - Business

Historic Context:

Category
Commerce

Architect/Engineer:

Category	Name or Company
Architect	Bouillon, Richard
Builder	Central Construction Company



Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411

Thematics:

Local Registers and Districts

Name	Date Listed	Notes
------	-------------	-------

Project History

Project Number, Organization, Project Name	Resource Inventory	SHPO Determination	SHPO Determined By, Determined Date
2017-11-07927, , Sound Transit I-405 BRT	1/29/2020	Not Determined	Holly Borth, 7/28/2021
2021-07-04474, , South Renton Transit Center Site Building Demolition Project	7/28/2021	Determined Not Eligible	Holly Borth, 7/28/2021
2021-07-04474, , South Renton Transit Center Site Building Demolition Project	7/28/2021	Determined Not Eligible	Holly Borth, 7/28/2021

Photos



750 Rainier Ave S_2020_E.JPG.jpg



750 Rainier Ave S_2020_SW.JPG



750 Rainier Ave S_2020_SE.JPG.jpg



750 Rainier Ave S_2020_S.JPG



750 Rainier Ave S_2020_NW.JPG



750 Rainier Ave S_2020_NE.JPG

Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411



750RainierAveS_footprint_2017.jpg



750RainierAveS_viewW_2017.jpg



750RainierAveS_viewSW_1969.jpg



750RainierAveS_viewSE_2017.jpg



750RainierAveS_viewSE_2001.jpg



750RainierAveS_viewsS_2017.jpg

Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411



750RainierAveS_viewNW_2017.jpg



750RainierAveS_viewNE_2013.jpg



750RainierAveS_viewNE_1969.jpg



750RainierAveS_viewN_2017.jpg



Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411

Inventory Details - 1/29/2020

Common name: Sound Ford
Date recorded: 1/29/2020
Field Recorder: Johanna Kahn updated (Alicia Valentino 11/2017)
Field Site number: N/A

SHPO Determination

Detail Information

Characteristics:

Category	Item
Foundation	Concrete - Poured
Form Type	Commercial
Roof Type	Flat with Parapet
Roof Material	Asphalt/Composition - Built Up
Cladding	Marblecrete
Structural System	Masonry - Poured Concrete
Plan	Irregular

Surveyor Opinion

Property appears to meet criteria for the National Register of Historic Places: No

Property is located in a potential historic district (National and/or local): No

Property potentially contributes to a historic district (National and/or local): No

Significance narrative: The building at 750 Rainier Avenue S. was constructed in 1968 as the 35,915-square-foot Robinson & Lyon Ford car dealership. According to historic property records, the architect was Richard Bouillon, who is considered by the SHPO to be a master architect (Holly Borth and Alex Stevenson, personal communication, 2021) and the builder was Central Construction Company; preliminary research did not find any information about this company (King County Assessor 1968). The building was later occupied by Sound Ford, and it is vacant at the time of this statement. While the building is located along a half-mile stretch of Rainier Avenue S. with several other car dealerships, this was not an auto row, analogous to lengths along Aurora Avenue in Seattle where dealerships line the right-of-way. Rather, the immediate area is characterized by a variety of commercial businesses.

Seattle-born architect Richard Bouillon (1927-1973) graduated from the University of Washington in 1952 and received his architectural license in 1954. He was initially in a partnership with architect Joseph Williams, and in 1959 he established his own practice, Richard Bouillon & Associates, which primarily designed commercial projects. One of Bouillon's notable early projects was Crescent Apartments in Seattle (ca. 1963), for which he was given an award from Practical Builder Magazine (The Johnson Partnership 2019). He also designed a Lincoln First Federal Savings and Loan in Kent (1963), a one-story office complex for Rudy Simone Construction Company in Seattle (1964), Lake Forest



Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411

Park Shopping Center (1964), Crossroads Restaurant in the Bellevue Play Barn (collaboration with architect John Woodman, 1964), a B.F. Goodrich Co. store (1964), Klopfenstein's retail store in downtown Seattle (ca. 1967), Washington Mutual Savings Bank in Renton (1968), Greenwood Inn/Red Lion Inn in West Olympia (1970), and the Totem Lake Mall in Kirkland (1973). Bouillon was honored by the AIA for alterations to the University Chevrolet car dealership in Seattle ca. 1969 (BOLA Architecture and Planning 2012; Houser 2007).

The building remains where it was originally constructed, and it retains integrity of location. It has undergone extensive alterations (detailed further under Physical Description, below), and it does not retain integrity of design, materials, and workmanship. It remains surrounded by small-scale commercial/automotive buildings and vast paved parking lots, and many of the buildings have been remodeled or replaced with newer construction. Integrity of setting, feeling, and association has been compromised. For these reasons, the property does not retain sufficient integrity in order to convey its historic identity.

Although 750 Rainier Avenue S. is associated with the increasing demand for automobile ownership in Renton during the late 20th century, it does not appear to be directly associated with a pattern of events or trend that made a significant contribution to the community's development. It is therefore recommended not eligible for listing in the NRHP under Criterion A (event). The dealership has been owned and operated by multiple people since 1971, and preliminary research did not identify any significant people with whom the building is associated. It is recommended not eligible for listing in the NRHP under Criterion B (person). Originally designed in a Mid-Century Modern style by master architect Richard Bouillon and later extensively altered to reflect a faux-Streamline Moderne design, the automobile dealership no longer reflects Bouillon's design and is no longer considered to be the work of a master. The current design does not embody the distinctive characteristics of a type, period, or method of construction or possess high artistic values. It is therefore recommended not eligible for listing in the NRHP under Criterion C (design/construction). Given the date and type of construction, it is unlikely that the building would yield information important in history, and it is therefore recommended not eligible for listing under Criterion D (information potential). For a property to be eligible for listing in the NRHP, it must be significant under at least one of the criteria and possess integrity. Although Bouillon is considered by the SHPO to be a master architect, the building is recommended not eligible for listing in the NRHP because it does not retain sufficient integrity to convey its potential significance under Criterion C.



Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411

Physical description:

The building at 750 Rainier Avenue S. is located in Renton, King County. The two-story commercial building features an irregular plan and sits on a concrete foundation. The eastern half of the building (i.e., the original 1968 building) is constructed of tilt-up concrete walls, and the entire building is capped by a series of flat, built-up roofs. The primary (west) façade is clad in smooth, scored concrete and features fixed, aluminum-frame windows. The main entrance is centered on the façade and includes a pair of glazed aluminum-frame doors. The western portions of the north and south elevations are also clad in concrete, and the remainder of the building is clad in pebble dash, which is original to the 1968 design. The rear (east) elevation is composed of 16 structural bays, each with a vehicular door.

Exterior alterations believed to have been made to the subject building ca. 1991 were extensive, and the building no longer reflects its original Mid-Century Modern-style design. On the west (front) half of the building, the pebble dash cladding was replaced with smooth concrete; the original fenestration was removed and the fenestration pattern changed; and the massing, footprint, and roof forms were altered. The primary (west) façade was essentially redesigned in a faux-Streamline Moderne style.



Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411

Bibliography:

BOLA Architecture and Planning

2012 AYPE Foundry/Engineering Annex Building, University of Washington – Historic Resources Addendum. July 24, 2012. Electronic document, <https://facilities.uw.edu/files/media/eng-annex-hra-7-24-2012-final-report-0.pdf>, accessed January 30, 2020.

Houser, Michael C

2007 Richard Bouillon. Architect and Builder Biographies. Electronic document, <https://dahp.wa.gov/historic-preservation/research-and-technical-preservation-guidance/architect-biographies/bio-for-richard-bouillon>, accessed June 24, 2021.

The Johnson Partnership

2019 Seattle Landmark Nomination for Crescent Apartments. Prepared for ART 2 LLC. Electronic document, http://www.seattle.gov/Documents/Departments/Neighborhoods/HistoricPreservation/Landmarks/CurrentNominations/LPBCurrentNom_CrescentApt.pdf, accessed January 30, 2020.

King County Assessor

1968 King County Historic Property Records. On file, Washington State Archives, Puget Sound Regional Branch, Bellevue, WA
2020 Assessor's Data Report for Parcel 1923059035. Electronic document, <https://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=1923059035>, accessed January 30, 2020.

Pacific Coast Architecture Database

2020 Richard Bouillon (Architect). PCADid (6520). Electronic document, <http://pcad.lib.washington.edu/person/6520/>, accessed January 30, 2020.

Slauson, Morda

1976 Renton – From Coal to Jets. Renton Historical Society, Renton, Washington.

Stein, Alan J

1999 Renton--Thumbnail History. HistoryLink.org Essay 688. Electronic document, <http://www.historylink.org/File/688>, accessed January 30, 2020.

University of Washington Libraries

2020 Digital Collections. Available at <https://content.lib.washington.edu/>, accessed January 30, 2020.

Valentino, Alicia Ph.D.

2017 Contract No. D120673, Work Order 84 – Renton Properties Historic Property Evaluations. Prepared for Sound Transit by ESA. On file, ESA, Seattle.

Washington State Archives

2020 Digital Archives. Available at <http://www.digitalarchives.wa.gov>, accessed January 30, 2020.



Historic Property Report

Resource Name: Robinson and Lyon Ford Dealership

Property ID: 713411

Inventory Details - 7/28/2021

Common name:

Date recorded: 7/28/2021

Field Recorder: Holly Borth

Field Site number:

SHPO Determination

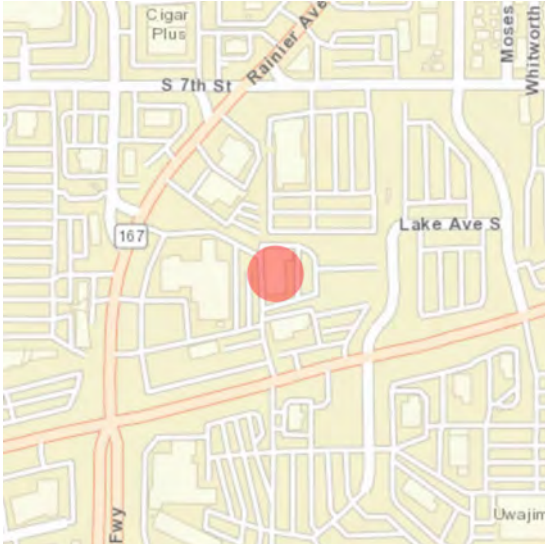


Historic Property Report

Resource Name: Sound Collision Center

Property ID: 713412

Location



Address: 720 Rainier Ave S, Renton, WA, 98057, USA

Location Comments: Building 1 fronts Rainier Avenue S. This building is in the rear, on King County Parcel 192305-9063.

Tax No/Parcel No: 1923059053

Geographic Areas: King County Certified Local Government, King County, T23R05E19, RENTON Quadrangle

Information

Number of stories: N/A

Construction Dates:

Construction Type	Year	Circa
Built Date	1971	<input type="checkbox"/>
Addition	2001	<input checked="" type="checkbox"/>

Historic Use:

Category	Subcategory
Commerce/Trade	
Commerce/Trade	

Historic Context:

Category
Commerce
Transportation



Historic Property Report

Resource Name: Sound Collision Center

Property ID: 713412

Architect/Engineer:

Category	Name or Company
Builder	Tech Construction Company

Thematics:

Local Registers and Districts

Name	Date Listed	Notes
------	-------------	-------

Project History

Project Number, Organization, Project Name	Resource Inventory	SHPO Determination	SHPO Determined By, Determined Date
2017-11-07927, , Sound Transit I-405 BRT	1/29/2020	Not Determined	Holly Borth, 7/28/2021
2021-07-04474, , South Renton Transit Center Site Building Demolition Project	7/28/2021	Determined Not Eligible	Holly Borth, 7/28/2021
2021-07-04474, , South Renton Transit Center Site Building Demolition Project	7/28/2021	Determined Not Eligible	Holly Borth, 7/28/2021

Photos



720 Rainier Ave S_Blg 2__2020_NE.JPG



720 RainierAveSBldg2_unknown_1972.JPG



720 RainierAveSBldg2_viewW_2013.jpg



720 RainierAveSBldg2_viewW_2017.jpg



720 RainierAveSBldg2_viewNE_2017.jpg



720 RainierAveSBldg2_viewNE_2001.JPG



720 RainierAveSBldg2_viewE_2001.JPG



720 Rainier Ave S_Blg 2__2020_W.JPG



720 Rainier Ave S_Blg 2__2020_E.JPG



720 RainierAveSBldg2_viewW_2017.jpg



Historic Property Report

Resource Name: Sound Collision Center

Property ID: 713412

Inventory Details - 1/29/2020

Common name: Toyota of Renton - Building 2
Date recorded: 1/29/2020
Field Recorder: Johanna Kahn updated (Alicia Valentino 11/2017)
Field Site number: N/A
SHPO Determination

Detail Information

Characteristics:

Category	Item
Foundation	Concrete - Poured
Form Type	Commercial
Roof Type	Gable - Side
Roof Material	Metal
Cladding	Metal - Corrugated
Structural System	Metal - Aluminum
Plan	L-Shape

Surveyor Opinion

Property appears to meet criteria for the National Register of Historic Places: No
Property is located in a potential historic district (National and/or local): No
Property potentially contributes to a historic district (National and/or local): No



Historic Property Report

Resource Name: Sound Collision Center

Property ID: 713412

Significance narrative: Building 2 at 720 Rainier Avenue S. was constructed in 1971 as the 11,200-square-foot body and repair shop for a car dealership. The builder was Tech Construction Company; research did not find any information on this company (King County Assessor 1971). Assessor data indicates that there was no known architect (King County Assessor 1971). The former car dealership was originally Toyota of Renton and was later named Walker's Renton Mitsubishi, Walker's Renton Mazda, and Sound Ford (King County Assessor 1971-1997). It has operated as Sound Collision Center in recent years (King County Assessor 2020). While the building is located along a half-mile stretch of road that has several car dealerships, this was not an auto row, analogous to lengths along Aurora Avenue in Seattle where dealerships line the right-of-way. Rather, the immediate area is characterized by a variety of commercial businesses (Valentino 2017).

The building remains where it was originally constructed, and it retains integrity of location. It has undergone few known alterations, and it retains integrity of design, materials, and workmanship. It remains surrounded by small-scale commercial/automotive buildings and vast paved parking lots, and it retains integrity of setting, feeling, and association. Overall, it retains a high degree of integrity.

Although Building 2 is associated with the increasing demand for automobile ownership in Renton during the late 20th century, it does not appear to be directly associated with a pattern of events or trend that made a significant contribution to the community's development. It is therefore recommended not eligible for listing in the NRHP under Criterion A (event). Building 2 has been owned and operated by multiple people since 1971, and research did not identify any significant people with whom the building is associated. It is recommended not eligible for listing in the NRHP under Criterion B (person). The modest commercial building was constructed of pre-engineered structural components, which is typical for body and repair shops of a similar age. As such, it does not embody the distinctive characteristics of a type, period, or method of construction. Likewise, it does not represent the work of a master and does not possess high artistic values. It is therefore recommended not eligible for listing in the NRHP under Criterion C (design/construction). Given the date and type of construction, it is unlikely that the building would yield information important in history, and it is therefore recommended not eligible for listing under Criterion D (information potential).

For these reasons, building 2 is recommended not eligible for listing in the NRHP under any criteria, either as an individual property or as a contributor to a potential historic district.

Physical description: Building 2 at 720 Rainier Avenue S is directly behind building 1 which fronts Rainier Avenue S, located in Renton, King County . The one-story commercial building features an L-shaped plan and sits on a concrete foundation. It is of galvanized steel construction, clad in corrugated steel siding, and capped by a gabled roof covered with corrugated metal. The primary (west) façade is composed of 12 structural bays, which include 10 vehicular doors and two pedestrian doors. The rear (east) elevation features eight vehicular doors, one pedestrian door, and a paint shop. The only known alteration is the addition of the paint shop on the east elevation in ca. 2001.



Historic Property Report

Resource Name: Sound Collision Center

Property ID: 713412

Bibliography:

King County Archives
2020 Digital Archives. Electronic document, <https://www.kingcounty.gov/depts/records-licensing/archives.aspx>, accessed January 30, 2020.

King County Assessor
1971-1997 King County Historic Property Records. On file, Washington State Archives, Puget Sound Regional Branch, Bellevue, WA
2020 Assessor's Data Report for Parcel 1923059063. Electronic document, <https://blue.kingcounty.com/Assessor/eRealProperty/Dashboard.aspx?ParcelNbr=1923059063>, accessed January 30, 2020.

Slauson, Morda
1976 Renton – From Coal to Jets. Renton Historical Society, Renton, Washington.
Stein, Alan J
1999 Renton--Thumbnail History. HistoryLink.org Essay 688. Electronic document, <http://www.historylink.org/File/688>, accessed January 30, 2020.

University of Washington Libraries
2020 Digital Collections. Available at <https://content.lib.washington.edu/>, accessed January 30, 2020.

Valentino, Alicia Ph.D.
2017 Contract No. D120673, Work Order 84 – Renton Properties Historic Property Evaluations. Prepared for Sound Transit by ESA. On file, ESA, Seattle.

Washington State Archives
2020 Digital Archives. Available at <http://www.digitalarchives.wa.gov>, accessed January 30, 2020.



Historic Property Report

Resource Name: Sound Collision Center

Property ID: 713412

Inventory Details - 7/28/2021

Common name:

Date recorded: 7/28/2021

Field Recorder: Holly Borth

Field Site number:

SHPO Determination

Attachment D

ESA Screening Checklist

ESA SCREENING CHECKLIST

Note: The purpose of this checklist is to assist sponsoring agencies and FTA in gathering and organizing materials for environmental analysis required under the Endangered Species Act (ESA). Submission of the checklist by itself does not meet ESA requirements. This checklist is intended solely for Region 10 use. Please contact the FTA Region 10 office at (206) 220-7954 if you have any questions regarding this worksheet.

Sponsoring Agency Sound Transit (Central Puget Sound Regional Transit Authority)		Date Submitted 5/5/22
Project Title South Renton Transit Center and Roadway Improvements Project		FTA Project Number (if known) None
Project Location (Include Street Address, City, County) 750 Rainier Avenue South, Renton, WA 98057 Northeast corner of SR 167 (Rainier Avenue S) and S Grady Way, Renton, King County, WA		
Project Contact: Lesley Maurer, Sound Transit	Phone Number 206-553-3892	E-mail Address (if available) lesley.maurer@soundtransit.org

Please answer the following questions as completely as possible. If the question is not applicable, check "N/A" in the space to the right

-
1. Describe the project and its purpose. Identify the jurisdiction(s) and watersheds (Watershed Resource Inventory Area/WRIA or Hydrologic Unit Code/HUC) in which the project is located.

This ESA screening checklist addresses the South Renton Transit Center and Roadway Improvements Project (SRTC Project), including both a full build of the project and an interim condition before the park-and-ride garage would be constructed. The SRTC Project is a component of the I-405 Bus Rapid Transit (BRT) Program that will provide BRT service as envisioned and addressed by the I-405 Master Plan Environmental Impact Statement and Sound Transit's Long Range Plan. The purpose of the SRTC Project is to increase regional mobility, accessibility, and system linkages, as well as improve transit travel times between the employment and population centers in Renton and other communities in the I-405 corridor. The SRTC Project is located within the City of Renton's jurisdiction, within the Green River subwatershed within Water Resource Inventory Area (WRIA) 9: Duwamish – Green.

South Renton Transit Center and Roadway Improvements Project – Full Build:

- Site remediation and demolition of the building foundations on the four transit center parcels (prior buildings on site were previously demolished).
- A new transit center island with eight 120-foot active bus bays; 13 bus layover bays in the bus loop area; and a 5-floor, 752-stall park-and-ride garage with 724 car stalls, 10 pick-up and drop-off stalls on the first floor and 28 motorcycle stalls.
- Pedestrian access to the transit center from existing and reconstructed sidewalks along Rainier Avenue S and S Grady Way. A new sidewalk will be constructed along the eastern side of the transit center, along the frontage of Lake Avenue S. Pedestrian sidewalks would also be constructed within the transit center along the north and south sides of the bus loop, from Rainier Avenue S and Lake Avenue S to the park-and-ride garage, from S Grady Way north into the transit center, and between the park-and-ride garage and the bus loop.
- Roadway improvements would be constructed to facilitate transit speed and reliability and access to the transit center, including improvements along Rainier Avenue S, S Grady Way, Hardie Avenue SW, and Lake Avenue S. The roadway improvements would include building a new short section of a bus-only, bus-on-shoulder lane on northbound Rainier Avenue S, starting at the existing southbound I-405 loop ramp and extending north approximately 200 feet to connect to the existing business access and transit lane; constructing a new signalized intersection at Rainier Avenue S and Hardie Avenue SW, which would provide access into and out of the transit center and by removing an existing raised landscaped island and center median; and providing a secondary access into the transit center bus loop from Lake Avenue S and another access from Lake Avenue S into the park-and-ride garage.
- Area on the transit center site for future potential transit-oriented development on surplus property adjacent to the proposed park-and-ride garage.

Interim Conditions Scenario:

In August 2021, Sound Transit's Board established an updated program schedule for the completion of ST3 voter approved projects. For this project, the updated program schedule is to complete construction of the transit center facilities and roadway improvements in 2026 and complete construction of the park-and-ride garage in 2034. For the interim years between 2026 and the start of construction of the park-and-ride garage, Sound Transit is considering two possible scenarios for that area of the transit center site. One scenario would include a kiss-and-ride drop-off area, but no new park-and-ride spaces. The other scenario would include two surface park-and-ride lots with up to 350 spaces and a kiss-and-ride drop-off area.

-
2. Have all other NEPA requirements been completed for this project?

Yes No

If so, under which NEPA Class does this project fall? (Refer to DCE letter, FONSI, or ROD)

Class I Class II Class III

3. Does the project qualify as a CE or a DCE?

Yes No

Has a Region 10 Documented Categorical Exclusion Worksheet been completed?

Yes No

A Region 10 DCE Worksheet has been completed for the South Renton Transit Center and Roadway Improvements Project.

Will the project include Best Management Practices / Conservation Measures?

Yes No

Has the BMP / CM Checklist (Appendix A) been completed?

Yes No

(Note: If the project: 1) includes in-water work or work below the ordinary high water mark (OHWM) of a waterbody with listed salmonids, 2) adds > 5,000 square feet of impervious surface, OR 3) includes any new impervious surface within 150 feet of a stream waterbody with listed salmonids, it may need to go through formal consultation with the NMFS and USFWS)

4. Has the applicant obtained Endangered/Threatened Species lists and critical habitat lists from both National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS) for the project area?

Yes No

List NMFS species/habitat here (and attach documentation):

Endangered: None

Threatened: The current listings from NMFS indicate the potential presence of the Puget Sound Evolutionarily Significant Unit of Chinook salmon (*Oncorhynchus tshawytscha*) and the Puget Sound Distinct Population Segment of steelhead trout (*Oncorhynchus mykiss*) within the project vicinity (Table 1 and Attachment A). However, no streams are present within the project footprint and the closest occurrence of ESA-listed species is mapped as within Springbrook Creek (also known as the Black River). Both Chinook and steelhead have been documented in the Black River, which would receive project stormwater runoff (approximately 0.8-mile southwest of the project area) (NMFS, 2022).

Proposed: None

List USFWS species/habitat here (and attach documentation):

Endangered: None

Threatened: Three threatened bird species (marbled murrelet (*Brachyramphus marmoratus*), streaked horned lark (*Eremophila alpestris strigata*), and yellow billed cuckoo (*Coccyzus americanus*)) and one threatened fish species (bull trout (*Salvelinus confluentus*)) are listed as occurring in the vicinity of the project (USFWS, 2022). However, no suitable habitat is present in the area of the project for any of these species (Table 1 and Attachment B).

Table 1. U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration Threatened and Endangered Species Considered for the South Renton Transit Center and Roadway Improvements Project

Species	Federal Status	Designated Critical Habitat (CH)	CH in Project Area	Effect Determination	Suitable Habitat in Project Vicinity
Puget Sound Fish Species (NMFS)¹					
Puget Sound Steelhead (<i>Oncorhynchus mykiss</i>)	Listed Threatened May 11, 2007, updated April 14, 2014	Yes	No	No effect	No. The closest known occurrence is in the Black River, approximately 0.8 mile southwest of the project area.
Puget Sound Chinook (<i>Oncorhynchus tshawytscha</i>)	Listed Threatened March 24, 1999 and June 28, 2005, updated April 14, 2014	Yes	No	No effect	No. The closest known occurrence is in the Black River, approximately 0.8 mile southwest of the project area.
USFWS Threatened and Endangered Species²					
Marbled Murrelet (<i>Brachyramphus marmoratus</i>)	Listed Threatened October 1, 1992	Yes	No	No effect	No. Foraging habitat is on the ocean; nesting habitat is in old-growth forests with high canopy closure.
Streaked Horned Lark (<i>Eremophila alpestris strigata</i>)	Listed Threatened November 4, 2013	Yes	No	No effect	No. Habitat is wide open spaces with no trees and few or no shrubs.
Yellow-billed Cuckoo (<i>Coccyzus americanus</i>)	Listed Threatened November 3, 2014	Yes	No	No effect	No. Habitat is large stands of dense willow and cottonwood habitat in river floodplains.
Bull Trout (<i>Salvelinus confluentus</i>)	Listed Threatened June 10, 1998	Yes	No	No effect	No. Cold water spawners, preferring the cold stream temperatures of snowmelt-fed streams.

¹ Source NMFS Species Directory (<https://www.fisheries.noaa.gov/species-directory/threatened-endangered>)

² Source USFWS IPac website (<https://ecos.fws.gov/ipac/>)

5. Has the applicant obtained Essential Fish Habitat (EFH) lists from the NMFS website (as required by the Magnuson-Stevens Fishery Conservation and Management Act (MSA)) for the project area?

Yes No

List Essential Fish Habitat here (and attach documentation):

The Puget Sound subbasin is listed as EFH for Chinook and Coho salmon (see Attachments C and D).

6. List the names of your partners for the project. Identify the project lead agency. N/A

Sound Transit (project proponent)

Federal Transit Administration (lead agency for NEPA)

Federal Highway Administration (approval of roadway improvements within the I-405 limited access right-of-way)

7. Check the federal permits needed for your project. List the numbers of the nationwide permits if needed.

	N/A	Pending	Approved
ACOE Nationwide	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ACOE Individual	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NPDES (Gen. or Ind.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

8. Check State and local permits needed for your project. Circle jurisdiction.

	N/A	Pending	Approved
HPA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Surface Mining	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forest Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shoreline	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shoreline Exemption	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clearing and Grading	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Building or Subdivision	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sensitive Areas Ordinance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>WSDOT</u>			
- Temporary Construction Air Space Lease and Air Space Lease			
- Construction Oversight Agreements			
- Utility Franchise			
- Design Documentation Package			
- General Permits			
- Limited Access Break			
<u>City of Renton</u>			
- Type III Conditional Use Permit and Site Plan Review			
- Utility Easement Vacation Approval			
- Right-of-Way Permit			
- Civil Construction Permit			
- Demolition Permit			
- Sign Permit			
- Critical Areas Exemption			
- Street Use Permit			
<u>Washington Department of Ecology</u>			
- Underground Storage Tank Removal, 30-day notice			
<u>Puget Sound Clean Air Agency</u>			
- Asbestos/Demolition Notification			

9. Which federal, State, or tribal agencies have you contacted regarding your project and its impacts? N/A

FTA contacted tribes on January 14, 2022, as part of Section 106 notification of the undertaking, initiating government-to-government consultation, and to request their comments. Sound Transit and FTA have discussed the project with FHWA. Sound Transit has discussed the project with DAHP. No other state or federal agencies have been contacted.

Describe any modifications to the project as a result of these contacts:

No modifications have occurred or are anticipated. No biological resources under ESA/EFH occur in the SRTC Project area or vicinity.

10. What is the specific location of your project? Provide the zoning designation and the ¼ section, section, township, WRIA(s), and range.

The SRTC Project is located within the City of Renton, WA, in the Green River subwatershed within WRIA 9 (Duwamish-Green); Section 19, Township 23N, Range 5E. The parcels that comprise the transit center site are zoned by the City of Renton as Commercial Arterial (CA). Roadway improvements would occur within existing public rights-of-way for roadways that do not have a City of Renton zoning designation.

The proposed South Renton Transit Center is located at 750 Rainier Avenue South, Renton, WA 98057.

The project location includes four parcels that comprise the proposed transit center site along S Grady Way and Rainier Avenue S (King County parcel numbers 192305-9035, 192305-9063, 192305-9068, and 192305-9074) and roadway improvements along State Route 167/Rainier Avenue S, Hardie Avenue SW, and Lake Avenue S within the City of Renton. Additional roadway improvements, primarily the removal of the landscape median, would occur along Rainier Avenue S. In addition, the roadway improvements would include reconstructing and realigning the intersection of Hardie Avenue SW with Rainier Avenue S and providing a new signalized intersection at Hardie Avenue SW and Rainier Avenue S for access into the transit center. These project elements are located in the Springbrook Creek drainage basin.

Improvements would also be made to Rainier Avenue S between SW 7th Street and I-405 and along the north side of S Grady Way between SR 167 and Lake Avenue S. These project elements are located within the Rolling Hills Creek drainage basin.

Does the project occur within an existing transportation corridor?

Yes No

11. Is the project within 150 feet of a lake, river, stream or bay, etc.? Yes No

If so, name the waterbodies.

N/A

Do these waterbodies contain listed salmonids or bull trout? Yes No

If so, name the listed species and agency with jurisdiction (USFWS or NMFS).

N/A

12. a. Will blasting or pile-driving occur within 1 mile of suitable owl or murrelet habitat (specifically, old growth tree(s) or forest)? Yes No (if no, go to 12b)

b. Is the project within 0.25 miles of suitable owl or murrelet habitat? Yes No

13. a. Will blasting or pile-driving occur within 1 mile of a known bald eagle nest? (Contact the State Department of Fish & Wildlife for nest locations.) Yes No (must answer both 13a and 13b)

b. Is the project within 0.5 miles (line-of-sight) or 0.25 miles (non-line-of-sight) of a bald eagle nest, wintering concentration, roost, or foraging area?

Yes No

-
14. What is the size of the project (list area or length of disturbance), the amount of new impervious surface, and the total impervious surface? N/A

The entire project area (including the areas of roadway improvements) is approximately 10.5 acres and is currently covered by approximately 10.4 acres of impervious surface, the vast majority of which (approximately 8.5 acres) is considered pollution generating impervious surface (PGIS). Construction of the transit center would result in an overall reduction of approximately 1.5 acres of total impervious surface within the project area. The project would also result in a net reduction of approximately 3.8 acres of PGIS as a result of converting existing PGIS to non-PGIS and pervious surfaces.

In answering the following questions, please describe the impacts assuming no mitigation:

IMPACT ASSESSMENT

-
15. Describe the potential beneficial and adverse impacts upon aquatic resources that will be caused by construction of the project: N/A

The SRTC Project area does not contain streams or wetlands, and the SRTC Project does not include in-water work.

Temporary impacts during construction, such as sedimentation in downstream streams, would be avoided with the application of appropriate best management practices (BMPs). These BMPs will include, but not be limited to, minimizing vegetation removal, stabilizing temporarily disturbed areas, staging construction and stockpile areas in existing areas of impervious surfaces, and refueling equipment in areas greater than 100 feet from any stormwater feature.

-
16. Describe the potential beneficial and adverse impacts upon aquatic resources resulting from the maintenance, use, or operation of the project (post-construction impacts):

N/A

Changes in stormwater discharges have the potential to affect ESA-listed fish species. Under existing conditions, approximately 8.5 acres of PGIS is located within the project footprint, within four separate threshold discharge areas (TDAs) based on drainage area and ownership (Table 2). This includes TDA 1, which ultimately drains to Springbrook Creek (a tributary to the Green River), TDA 2, which drains to Rolling Hills Creek (a seasonal tributary to the Cedar River), and TDAs 3 and 4, which drain to the Black River, all via the City of Renton stormwater system. It is estimated that only a very small proportion (approximately 0.4 acre or 4 percent) of the existing impervious surface area is currently treated for water quality and none of the impervious surface in the project footprint receives detention or flow control.

Construction of the SRTC Project would convert approximately 3.8 acres of PGIS to non-PGIS and pervious surfaces and result in an overall net decrease of approximately 1.5 acres of impervious surface to pervious surfaces. A majority of the net decrease in PGIS would occur in TDA 1, but the net PGIS would be reduced in all four TDAs.

The Renton Stormwater Design Manual (City of Renton, 2017) applies to most of the project, while the WSDOT Highway Runoff Manual (WSDOT, 2019) applies to the portion of the project within WSDOT right-of-way. To ensure water quality is maintained or improved, the project would treat an additional approximately 4.2 acres of PGIS, over current treatment levels, all in TDA 1 (Table 3). Treatment in TDA 1 would consist of four Filterra® bioretention media systems, two Modular Wetland Systems, and one compost-amended biofiltration swale (CABS). All treatment facilities are considered enhanced treatment by the Washington Department of Ecology. In TDA 1, flow control would not be provided because the project does not exceed the minimum criteria that would trigger flow control. In TDAs 2, 3, and 4, the changes in PGIS do not exceed the minimum criteria that would trigger water quality treatment and flow control.

Stormwater runoff from highways and roadways have been shown to contain constituents that can negatively affect aquatic life, specifically dissolved copper, dissolved zinc, and total suspended solids. Although quantitative modeling of pollutant loading, using the WSDOT HiRun model (WSDOT, 2020), is appropriate for highways with high levels (in the thousands) of average daily traffic, this model is not appropriate for parking and transit areas, and so the model was not employed. Instead, a qualitative approach was applied to determine the potential effects of project stormwater on ESA-listed fish.

Because the project would result in a substantial decrease in both PGIS and total impervious surface, and because the project would employ enhanced stormwater treatment to an additional 4.2 acres (in addition to the 0.4 acre treated under existing conditions), the pollutant loading of dissolved copper and zinc is expected to decrease, which would maintain or slightly enhance water quality. Furthermore, even if the project resulted in a very minor increase in pollutant loading, the concentration of these pollutants in Springbrook Creek, where the stormwater system discharges, would be negligible and unmeasurable, and would not have the potential to negatively affect ESA-listed salmonid species (Chinook salmon and steelhead trout) that may be present in the stream. The lack of a potential effect is based on the large reduction of PGIS area and the type of stormwater treatment proposed and on the large size of the contributing basin at the point of discharge. The contributing basin is approximately 3,600 acres (USGS, 2020) at the stormwater discharge point in Springbrook Creek, with a stream width of approximately 30 feet, indicating dilution would be complete at the end of pipe, and concentrations of dissolved zinc and copper from the project area would be well below thresholds determined to negatively affect salmonids.

Table 2. Existing and Proposed Impervious Surface

TDA #	Pre-Project Conditions		Converted by Project				Post-Project Conditions		Net Change in Impervious Surface (SF)	Net Change in PGIS Impervious Surface (SF)
	Existing Impervious Surface (SF)	Existing PGIS (SF)	Converted from Impervious to Pervious (SF)	New Impervious (SF)	Converted from PGIS to Non-PGIS and Pervious (SF)	New PGIS (SF)	Post-Project Impervious Surface (SF)	Post-Project PGIS (SF)		
TDA 1	400,400	327,823	67,733	7,075	156,701	59,145	339,742	230,267	-60,658	-97,556
TDA 2	24,393	16,208	6,398	3,611	5,562	128	21,606	10,774	-2,787	-5,434
TDA 3	20,692	20,090	1,521	2,450	2,680	1,201	21,621	18,611	929	-1,479
TDA 4	7,209	6,391	2,185	1,660	2,812	980	6,684	4,559	-525	-1,832
TOTAL	452,694	370,512	77,837	14,796	167,755	61,454	389,653	264,211	-63,041	-106,301

Table 3. Existing and Proposed Stormwater Treatment and Flow Control

TDA #	Pre-Project Treatment/Flow Control		Added by Project		Post-Project Treatment/Flow Control	
	Pre-Project Impervious Receiving SW Treatment (SF) (and type)	Pre-Project Impervious Receiving SW Detention (SF)	Treatment Added by Project (SF) (and type)	Detention Added by Project (SF)	Post-Project Impervious Receiving SW Treatment (SF)	Post-Project Impervious Receiving SW Detention (SF)
TDA 1	17,424 (enhanced)	0	183,560 (enhanced)	0	200,984	0
TDA 2	0	0	0	0	0	0
TDA 3	0	0	0	0	0	0
TDA 4	0	0	0	0	0	0
TOTAL	17,424	0	183,560	0	200,984	0

17. Describe the potential beneficial and adverse impacts upon terrestrial resources that will be caused by construction of the project: N/A

The SRTC Project area is primarily covered in impervious surfaces and is located within a highly developed landscape. The SRTC Project area does not support any ESA-listed species; therefore, construction would have no effect on any listed terrestrial species. The SRTC Project area currently provides minimal, low-quality habitat that is likely primarily used by birds and small mammals that are well adapted to living in a highly altered landscape and that can tolerate or benefit from human disturbance. The surrounding areas are likely to provide these terrestrial animals with similar conditions. Any avoidance of the area from these terrestrial animals during construction would be temporary, and once construction is complete species would be expected to return to their pre-construction behavior.

18. Describe the potential beneficial and adverse impacts upon terrestrial resources resulting from the maintenance, use, or operation of the project (post-construction impacts): N/A

For the reasons discussed in Question 17, no operational effects, including those from maintenance, are expected to have a beneficial or adverse effect upon terrestrial resources.

MITIGATION

19. Is the project likely to alter the water quality of any water bodies such as bays, estuaries, lakes, streams, rivers or wetlands (through sedimentation, urban runoff, toxics, turbidity, etc.)?

Yes No (If yes, answer a and b.)

- a. What mitigation is proposed for construction impacts?

The SRTC Project includes construction BMPs that would be implemented, and state and local requirements would be followed to minimize potential water quality impacts. BMPs for the project could include, but would not be limited to, storm drain inlet protection, straw bale barriers or fiber rolls as needed, and decontamination of the construction equipment. These measures would prevent and control impacts to area surface and ground water. These measures would be integrated with proposed spoils containment and disposal plans.

- b. What mitigation is proposed for long-term impacts?

No long-term impacts are anticipated.

20. Will the project discharge water or generate runoff to any water bodies such as bays, estuaries, lakes, streams, rivers or wetlands?

Yes No (If yes, answer a and b.)

- a. What mitigation is proposed for construction impacts?

See response to 19.a., above.

- b. What mitigation is proposed for long-term impacts?

See response to 16, above.

21. Are clearing and grading activities part of the project? What is the area of direct disturbance? Include soil-disturbing activities, tree/shrub removal, and alteration of upland habitat.

Yes No (If yes, answer a and b.)

- a. What mitigation is proposed for construction impacts?

Site-specific erosion-control measures would be developed and applied to the construction of the SRTC Project. Project construction would be required to meet the erosion-control standards of the City of Renton, WSDOT, and Sound Transit. A Temporary Erosion and Sediment Control (TESC) Plan would be implemented for the project. This TESC would likely include the use of silt fencing, straw bales, and straw wattles, among other measures, to minimize the potential for soil-disturbing construction activities to increase the turbidity and sedimentation of receiving waters. Storm drains would be protected during all work. The SRTC Project would not involve work within, or adjacent to, any wetlands or streams because none are located within the project footprint.

During all work, the potential effect of accidental spills of materials, should they occur, will be minimized in large part by the adherence to a Spill Prevention and Control Countermeasures Plan developed specifically for this project.

- b. What mitigation is proposed for long-term impacts?

No long-term impacts would occur, so mitigation is not required.

22. Will the project remove or modify riparian vegetation within 150 feet of a water body?

Yes No (If yes, answer a and b.)

- a. What mitigation is proposed for construction impacts?

- b. What mitigation is proposed for long-term impacts?
-

23. Will the project place a structure within—or cause any change to—the bed or banks of a body of water?

Yes No (If yes, answer a and b.)

a. What mitigation is proposed for construction impacts?

b. What mitigation is proposed for long-term impacts?

24. Will the project place fill or structures within any 100-year floodplain?

Yes No (If yes, answer a and b.)

a. What mitigation is proposed for construction impacts?

The area south of South Grady Way is located within a 100-year floodplain as mapped by King County and on FEMA's FIRM map (Map number 53033C0977) and is in flood zone AH (100-year flood zone) and zone X (500-year flood zone). Zone AH is defined by FEMA as an area of shallow flooding (usually areas of ponding) where average depths are between 1 and 3 feet. Zone X is defined as areas with 0.2 percent annual chance of flood. This area was likely historically associated with Panther Creek and the Black River floodplain. This area is currently developed with commercial buildings and associated parking lots.

Project work within this area would be limited to paving for the new bus-on-shoulder lane. The project work would not change the elevation of the surrounding land, parking lot, or roadway, and therefore would not change the base flood elevation. The project will be conducted in accordance with City of Renton requirements and as noted in Appendix A.

b. What mitigation is proposed for long-term impacts?

Sound Transit will follow all permit conditions applied by the City of Renton in design and operation of the facility.

25. Will the project divert water to or from the bay, estuary, lake, stream, river or wetland?

Yes No (If yes, answer a and b.)

a. What mitigation is proposed for construction impacts?

b. What mitigation is proposed for long-term impacts?

26. Will construction and/or operation of the project produce noise above ambient levels?

Yes No

If so, explain:

Construction of the SRTC Project would elevate noise levels slightly above ambient baseline due to operation of equipment. The loudest construction activity would be pile driving, if it is determined to be required for construction of the foundation of the park-and-ride garage. However, ambient noise levels are high because the project is located in a highly developed urban environment, with commercial and industrial land uses, directly adjacent to SR 167 and I-405. In the long term, operations at the transit facility and traffic along the roadway improvements would not increase existing ambient noise levels. Based on the high levels of ambient and traffic noise in the immediate project vicinity, noise levels would quickly attenuate to background. Furthermore, no ESA-listed species, or habitats for these species, are located in the vicinity of the project, so construction or operational noise would not affect these species.

27. Has all necessary environmental documentation been provided to FTA (request letters, agency response documentation, permit approvals)?

Yes No

Appendix A

Best Management Practices (BMPs) / Conservation Measures (CM) Checklist

Please confirm use of the following measures in your project. If the question is not applicable, check "N/A" in the space to the right and provide an explanation of why. Consult your FTA Region 10 contact for more information on this checklist.

Conservation Measures During Construction

Exposed Soils/Riparian Vegetation:

- Yes No N/A Minimize the areal extent of exposed soil at any given time. Stabilize all unstable slopes with the potential to impact listed fish-bearing waters.
- Yes No N/A Replant disturbed riparian areas outside of the 150 foot setback with native species at a 2:1 ratio, including the removal of mature trees (greater than 6 inches diameter breast height, or dbh).

There are no riparian areas within the project area.

- Yes No N/A Do not place temporary material storage piles (>12 hours storage) in the 100-year floodplain during the rainy season unless storage occurs when flooding is not imminent, and storage piles with erosive material are covered with plastic tarps (or similar) and surrounded with erosion control devices.
- Yes No N/A Conduct extensive soil-disturbing work, including excavation, in the "dry" season (generally from June to October).
- Yes No N/A Prepare a Temporary Erosion and Sediment Control (TESC) Plan prior to construction to identify standard erosion and sediment control procedures.

Stormwater Maintenance:

- Yes No N/A Develop and implement a Stormwater Site Plan for > 1 acres of clearing, grading, or grubbing.
- Yes No N/A No untreated, undetained stormwater or dewatering will leave the limits of the construction site.
- Yes No N/A Discharged water will not exceed existing (baseline) conditions based on a 2-year storm event.

Spill Controls

- Yes No N/A Restrict vehicle use in wetland and/or riparian areas.

There are no wetlands or riparian areas within the project area.

- Yes No N/A Maintain a 300 ft setback for construction staging areas and equipment refueling near wetlands, streams, rivers, or drainages.

The project area does not include wetlands, streams, rivers, or drainages (other than stormwater system catch basins, which would be addressed through the project's SPCCP).

- Yes No N/A Prepare a Spill Prevention, Containment, and Control Plan (SPCCP) prior to construction to address potentially toxic materials used on-site during construction.
- Yes No N/A Keep spill clean-up equipment available onsite during construction, and include a spill control separator in the overall drainage system, if necessary.
- Yes No N/A Paving, chip sealing, and/or painting should occur in dry weather. Use 2-gallon pails and drip pans/protective devices when available.

Yes No N/A For projects involving concrete, establish concrete truck chute cleanout areas to properly contain wet concrete. Protect all inlets and catchments from fresh concrete, tackifier, paving, or paint stripping if inclement weather unexpectedly occurs.

Yes No N/A Collect and dispose debris accumulations prior to fresh water flushing. Use clean water only.

Yes No N/A Clean paint materials and maintenance equipment outside of surface waters. Do not discharge cleaning runoff into surface waters.

Long-Term Conservation Measures

Yes No N/A All construction & operation will occur greater than 150 feet from a listed salmonid-bearing waterbody.

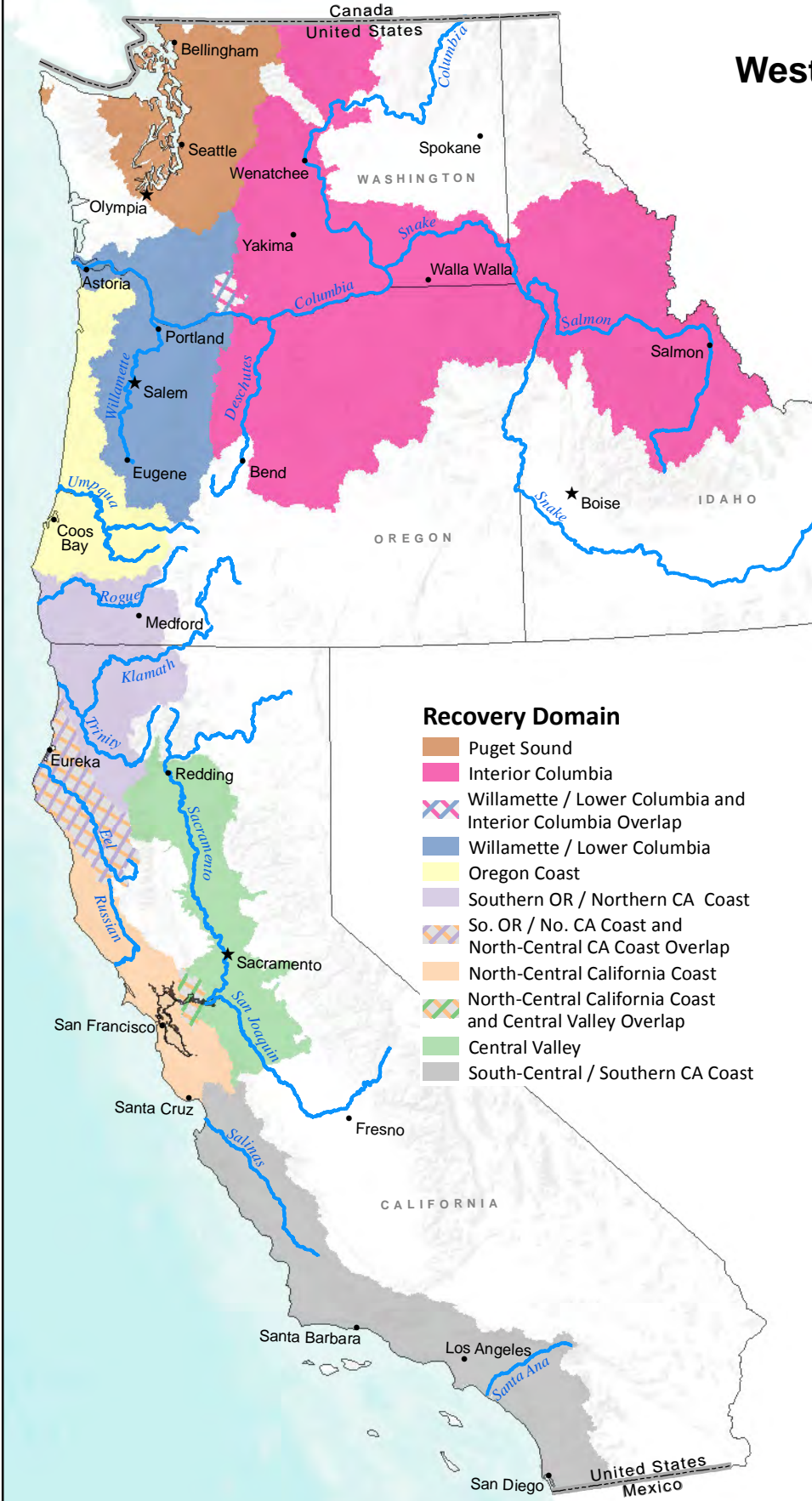
Yes No N/A Oil-water separators, bioswales, or other appropriate water quality treatment will be provided for 100% of all new and disturbed impervious surfaces.

Yes No N/A Stormwater infiltration facilities will be designed with appropriate infiltration conditions and will be upgraded to handle increased flows or treatment.

Yes No N/A Stream modifications or in-stream structures will not occur.

There are no streams within the project area.

Status of ESA Listings & Critical Habitat Designations for West Coast Salmon & Steelhead



- Recovery Domain**
- Puget Sound
 - Interior Columbia
 - Willamette / Lower Columbia and Interior Columbia Overlap
 - Willamette / Lower Columbia
 - Oregon Coast
 - Southern OR / Northern CA Coast
 - So. OR / No. CA Coast and North-Central CA Coast Overlap
 - North-Central California Coast
 - North-Central California Coast and Central Valley Overlap
 - Central Valley
 - South-Central / Southern CA Coast

Evolutionarily Significant Unit / Distinct Population Segment	ESA Status	Date of ESA Listing	Date of CH Designation
Puget Sound Recovery Domain			
Hood Canal Summer-run Chum Salmon	T	3/25/1999	9/2/2005
Ozette Lake Sockeye Salmon	T	3/25/1999	9/2/2005
Puget Sound Chinook Salmon	T	3/24/1999	9/2/2005
Puget Sound Steelhead	T	5/11/2007	2/24/2016

Interior Columbia Recovery Domain			
Middle Columbia River Steelhead	T	3/25/1999 1/5/2006	9/2/2005
Snake River Fall-run Chinook Salmon	T	4/22/1992	12/28/1993
Snake River Spring / Summer-run Chinook Salmon	T	4/22/1992	10/25/1999
Sockeye Salmon	E	11/20/1991	12/28/1993
Snake River Steelhead	T	8/18/1997 1/5/2006	9/2/2005
Upper Columbia River Spring-run Chinook Salmon	E	3/24/1999	9/2/2005
Upper Columbia River Steelhead	T	8/18/1997 1/5/2006	9/2/2005

Willamette / Lower Columbia Recovery Domain			
Columbia River Chum Salmon	T	3/25/1999	9/2/2005
Lower Columbia River Chinook Salmon	T	3/24/1999	9/2/2005
Lower Columbia River Coho Salmon	T	6/28/2005	2/24/2016
Lower Columbia River Steelhead	T	3/19/1998 1/5/2006	9/2/2005
Upper Willamette River Chinook Salmon	T	3/24/1999	9/2/2005
Upper Willamette River Steelhead	T	3/25/1999 1/5/2006	9/2/2005

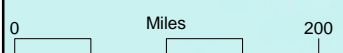
Oregon Coast Recovery Domain			
Oregon Coast Coho Salmon	T	2/11/2008	2/11/2008

Southern Oregon / Northern California Coast Recovery Domain			
Southern OR / Northern CA Coasts Coho Salmon	T	5/6/1997	5/5/1999

North-Central California Coast Recovery Domain			
California Coastal Chinook Salmon	T	9/16/1999	9/2/2005
Central California Coast Coho Salmon	E	10/31/1996 (T) 6/28/2005 (E) 4/2/2012 (RE)	5/5/1999
Central California Coast Steelhead	T	8/18/1997 1/5/2006	9/2/2005
Northern California Steelhead	T	6/7/2000 1/5/2006	9/2/2005

Central Valley Recovery Domain			
California Central Valley Steelhead	T	3/19/1998 1/5/2006	9/2/2005
Central Valley Spring-run Chinook Salmon	T	9/16/1999	9/2/2005
Sacramento River Winter-run Chinook Salmon	E	11/5/1990 (T) 1/4/1994 (E)	6/16/1993

South-Central / Southern California Coast Recovery Domain			
South-Central California Coast Steelhead	T	8/18/1997 1/5/2006	9/2/2005
Southern California Steelhead	E	8/18/1997 5/1/2002 (RE) 1/5/2006	9/2/2005



Critical Habitat Rules Cited

- 2/24/2016 (81 FR 9252) Final Critical Habitat Designation for Puget Sound Steelhead and Lower Columbia River Coho Salmon
- 2/11/2008 (73 FR 7816) Final Critical Habitat Designation for Oregon Coast Coho Salmon
- 9/2/2005 (70 FR 52630) Final Critical Habitat Designation for 12 ESU's of Salmon and Steelhead in WA, OR, and ID
- 9/2/2005 (70 FR 52488) Final Critical Habitat Designation for 7 ESU's of Salmon and Steelhead in CA
- 10/25/1999 (64 FR 57399) Revised Critical Habitat Designation for Snake River Spring/Summer-run Chinook Salmon
- 5/5/1999 (64 FR 24049) Final Critical Habitat Designation for Central CA Coast and Southern OR/Northern CA Coast Coho Salmon
- 12/28/1993 (58 FR 68543) Final Critical Habitat Designation for Snake River Chinook and Sockeye Salmon
- 6/16/1993 (58 FR 33212) Final Critical Habitat Designation for Sacramento River Winter-run Chinook Salmon

ESA Listing Rules Cited

- 4/2/2012 (77 FR 19552) Final Range Extension for Endangered Central California Coast Coho Salmon
- 2/11/2008 (73 FR 7816) Final ESA Listing for Oregon Coast Coho Salmon
- 5/11/2007 (72 FR 26722) Final ESA Listing for Puget Sound Steelhead
- 1/5/2006 (71 FR 5248) Final Listing Determinations for 10 Distinct Population Segments of West Coast Steelhead
- 6/28/2005 (70 FR 37160) Final ESA Listing for 16 ESU's of West Coast Salmon
- 5/1/2002 (67 FR 21586) Range Extension for Endangered Steelhead in Southern California
- 6/7/2000 (65 FR 36074) Final ESA Listing for Northern California Steelhead
- 9/16/1999 (64 FR 50394) Final ESA Listing for Two Chinook Salmon ESUs in California
- 3/25/1999 (64 FR 14508) Final ESA Listing for Hood River Canal Summer-run and Columbia River Chum Salmon
- 3/25/1999 (64 FR 14517) Final ESA Listing for Middle Columbia River and Upper Willamette River Steelhead
- 3/25/1999 (64 FR 14528) Final ESA Listing for Ozette Lake Sockeye Salmon
- 3/24/1999 (64 FR 14308) Final ESA Listing for 4 ESU's of Chinook Salmon
- 3/19/1998 (63 FR 13347) Final ESA Listing for Lower Columbia River and Central Valley Steelhead
- 8/18/1997 (62 FR 43937) Final ESA Listing for 5 ESU's of Steelhead
- 5/6/1997 (62 FR 24588) Final ESA Listing for Southern Oregon / Northern California Coast Coho Salmon
- 10/31/1996 (61 FR 56138) Final ESA Listing for Central California Coast Coho Salmon
- 1/4/1994 (59 FR 222) Final ESA Listing for Sacramento River Winter-run Chinook Salmon
- 4/22/1992 (57 FR 14653) Final ESA Listing for Snake River Spring/summer-run and Snake River Fall Chinook Salmon
- 11/20/1991 (56 FR 58619) Final ESA Listing for Snake River Sockeye Salmon
- 11/5/1990 (55 FR 46515) Final ESA Listing for Sacramento River Winter-run Chinook Salmon

Attachment B



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Washington Fish And Wildlife Office
510 Desmond Drive Se, Suite 102
Lacey, WA 98503-1263
Phone: (360) 753-9440 Fax: (360) 753-9405
<http://www.fws.gov/wafwo/>

In Reply Refer To:

April 14, 2022

Project Code: 2022-0031966

Project Name: I-405 BRT South Renton Transit Center and Roadway Improvements

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Washington Fish And Wildlife Office

510 Desmond Drive Se, Suite 102

Lacey, WA 98503-1263

(360) 753-9440

Project Summary

Project Code: 2022-0031966
Event Code: None
Project Name: I-405 BRT South Renton Transit Center and Roadway Improvements
Project Type: Road/Hwy - Maintenance/Modification
Project Description: Construction of a new transit facility including a 5 story garage and associated roadway improvements.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@47.47064675,-122.21790896344166,14z>



Counties: King County, Washington

Endangered Species Act Species

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Birds

NAME	STATUS
Marbled Murrelet <i>Brachyramphus marmoratus</i> Population: U.S.A. (CA, OR, WA) There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/4467	Threatened
Streaked Horned Lark <i>Eremophila alpestris strigata</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/7268	Threatened
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

Fishes

NAME	STATUS
Bull Trout <i>Salvelinus confluentus</i> Population: U.S.A., conterminous, lower 48 states There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/8212	Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

IPaC User Contact Information

Agency: WSP
Name: April Ryckman
Address: 1001 Fourth Ave
Address Line 2: Suite 3100
City: Seattle
State: WA
Zip: 98154
Email: april.ryckman@wsp.com
Phone: 2063828300

Lead Agency Contact Information

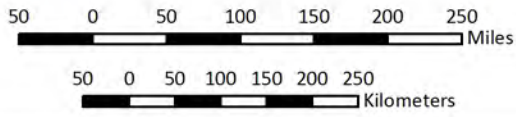
Lead Agency: Federal Transit Administration

Chinook Salmon West Coast States Essential Fish Habitat (EFH)

Salmonid EFH described in "Fisheries Off West Coast States; West Coast Salmon Fisheries; Amendment 18 to the Salmon Fishery Management Plan" published in the Federal Register / Vol. 79, No. 243/ Thursday, December 18, 2014.



Impassable Dam	Chinook Salmon EFH (2014)	Marine Salmon EFH (2014)	4th Field Hydrologic Unit (HU)
Natural Barrier			



12/2014, C. Gavette Chinook_EFH_2014.mxd
 UNITED STATES DEPARTMENT OF COMMERCE
 National Oceanic and Atmospheric Administration
 NATIONAL MARINE FISHERIES SERVICE
 WEST COAST REGION
 777 Sonoma Ave., Room 325
 SANTA ROSA, CALIFORNIA 95404

Coho Salmon West Coast States Essential Fish Habitat (EFH)

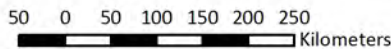
Salmonid EFH described in "Fisheries Off West Coast States; West Coast Salmon Fisheries; Amendment 18 to the Salmon Fishery Management Plan" published in the Federal Register / Vol. 79, No. 243/ Thursday, December 18, 2014.



	Impassable Dam		Coho Salmon EFH (2014)		Marine Salmon EFH (2014)		4th Field Hydrologic Unit (HU)
--	----------------	--	------------------------	--	--------------------------	--	--------------------------------



NOAA
FISHERIES



12/2014, C. Gavette Coho_EFH_2014.mxd

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
WEST COAST REGION
777 Sonoma Ave., Room 325
SANTA ROSA, CALIFORNIA 95404

Attachment E
Sole Source Aquifer Checklist and Correspondence

Sole Source Aquifer Checklist

PROJECT NAME: South Renton Transit Center and Roadway Improvements Project with Early Borings and Design Investigations

NAME OF SOLE SOURCE AQUIFER OR SOURCE AREA: Cedar Valley Sole Source Aquifer (Figure 1, Aquifer and Project Location)

1. Location of project

The South Renton Transit Center will be located on the north side of I-405, in the northeast corner of the intersection of South Grady Way and Rainier Avenue South (State Route 167). The current street address for the transit center site is 750 Rainier Avenue South, Renton, WA. The site is located within Section 19, Township 23N, Range 5E (Figure 2, Project Location). The Project also includes improvements to adjacent roadways and intersections, as described in Question 2 below.

2. Project description

The South Renton Transit Center and Roadway Improvements Project (Project) will be constructed on a paved and pre-developed site (previously used for automotive dealer and repair facilities) and will include a new transit center island with 8 active bus bays, 10 bus layover bays in the transit-only loop, a 5-floor park-and-ride garage, and associated roadway and sidewalk improvements to facilitate access. To develop this Project, an early borings and design investigation effort is planned, consisting of a variety of subsurface explorations to: identify the potential presence of archaeological resources; determine existing environmental conditions on the site and project roadways; inform project design and construction with information on groundwater depth and infiltration; and develop a plan to remediate known soil and groundwater contamination. Prior to constructing the transit center facilities, the existing buildings on the site would house an interim use for Sound Transit security staff. Additional project details are provided below.

Early Borings and Design Investigations

The early borings and design investigations consist of the following activities (see Question 8 for the likely depths of these activities):

- **Geoarchaeological Borings** – Fifteen (15) direct-push geoprobe borings would be conducted on the proposed South Renton Transit Center site for laboratory-based archaeological assessment and classification.
- **Geotechnical Borings** – Eleven (11) geotechnical borings would be conducted, including seven on the South Renton Transit Center site and four on adjacent roadways that are planned to be modified, to better understand the soil conditions and address seismic considerations during design. Up to two groundwater monitoring wells (approximately 2 inches in diameter) would also be installed in the geotechnical borings on the South Renton Transit Center site. The groundwater

monitoring wells would remain in place throughout design and would be decommissioned during construction.

- **Environmental Site Assessment Borings** – Twenty-four (24) environmental site assessment borings using direct-push drilling methods would be conducted on the South Renton Transit Center site to further identify hazardous materials contamination. The environmental site assessment borings would be conducted to further explore three areas, within an existing parking lot, that were identified in a 2018 Phase II Environmental Site Assessment (ESA) as “hot spots.” In each of the three areas, up to four borings would initially be conducted around the previously identified “hot spot” area. If contamination is encountered, four additional borings would be conducted at a step-out of 10 feet from the initial boring to find the edge of the contamination. In addition, four groundwater monitoring wells are proposed in the north and center portion of the South Renton Transit Center site. Soil samples would be collected near the monitoring wells. These wells would be properly abandoned in place or removed prior to facility construction.
- **Infiltration Test Pit** – One infiltration test pit would be dug on the transit center site to inform stormwater and drainage design for the project.
- **Utility Potholes** – Thirty-three (33) potholes are planned, including 8 within Rainier Avenue South and 25 on the South Renton Transit Center site, to confirm the location of utility lines that may be critical to project design.

The geotechnical borings, archaeological borings, and infiltration test pit would be completed by the same driller and with the same geotechnical oversight. The utility potholing work and environmental site assessment borings would be completed by two other contractors. Depending on contractor schedules and sequencing, the work may occur all or partially in parallel. For all of the activities, the total duration of days in the field is estimated to be between 2 and 5 weeks; the specific calendar weeks may or may not be sequential depending on contractor schedules. Sound Transit will ensure coordination of all of the activities and contractors.

Figure 3 shows the proposed locations of the site investigative work. Final locations of borings may be adjusted up to 5 feet based on the existing locations of underground utilities.

Interim Use

Following completion of the early borings and design investigations, and prior to the start of construction for the transit center facilities, the South Renton Transit Center site will be used by Sound Transit as a satellite security operations center. One building will house Sound Transit security staff conducting day-to-day administrative and security activities, including storing vehicles at the site. As no impacts to subsurface conditions,

existing drainage, or the sole source aquifer are anticipated during the Interim Use phase of the Project, this phase is not addressed further in this document.

South Renton Transit Center and Roadway Improvements Project

Figure 4 shows the proposed South Renton Transit Center and Roadway Improvements, which would consist of (see the response to Question 8 for the likely depth of ground disturbance associated with these activities):

- Demolition of existing buildings on-site and on-site remediation.
- A new transit center island with eight 120-foot active bus bays with operational space provided for both bus rapid transit (BRT) and other bus transit service operated by King County Metro. The BRT station in the transit center island could include a shelter structure (possibly over the entire transit center island) and 9-inch high concrete platforms for passenger boarding.
- Ten bus layover bays in the bus loop area.
- A 5-floor, 700 stall park-and-ride garage with drop-off and pick-up stalls on the first floor.
- Pedestrian access to the transit center site from existing and reconstructed sidewalks along Rainier Avenue South and South Grady Way. A new sidewalk will be constructed along the eastern side of the transit center, along the frontage of Lake Avenue South. Pedestrian sidewalks would also be constructed within the transit center site along the north and south sides of the bus loop, from Rainier Avenue South and Lake Avenue South to the park-and-ride garage, from South Grady Way north into the site, and between the park-and-ride garage and the bus loop.
- Roadway improvements, including the following:
 - A new short section of a bus-only, bus-on-shoulder lane on northbound Rainier Avenue South starting at the existing southbound I-405 loop ramp and extending north approximately 200 feet to connect with the existing business access and transit lane.
 - A new signalized intersection at Rainier Avenue South and Hardie Avenue Southwest providing bus access into and out of the transit center's bus loop. The existing raised, landscaped median in Rainier Avenue South would be removed to allow for a bus-only left-turn pocket and turning movements, and crosswalks would be provided at each of the four roadway crossings.
 - Reconstruction of the connection of Hardie Avenue Southwest to Rainier Avenue South with a bus-only through lane and a right-turn-only lane for general-purpose traffic, including revisions to the existing landscaped curb.

- The addition of a secondary bus access into the transit center’s bus loop from the east side of the site from Lake Avenue South and providing connectivity to the bus bays and the layover spaces at the existing South Renton Park-and-Ride located just east of the South Renton Transit Center. Parking for operation and maintenance vehicles would be located parallel to the Lake Avenue South access to the bus loop.
- Signal-timing improvements, including adding transit signal priority to the traffic signal at the intersection of South Grady Way and southbound Rainier Avenue South and at Rainier Avenue South and SW 7th Street.

In the southern portion (adjacent to South Grady Way) and the eastern portion of the site (adjacent to Lake Avenue S) there is an existing Seattle City Light power line easement. Prior to the start of construction, Sound Transit would coordinate with the Seattle City Light, and utility providers as needed, to ensure construction activities would not interfere with their facilities and service.

3. Is there any increase of impervious surface? If so, what is the area?

Early Borings and Design Investigations

No. The borings and design investigations would occur within the boundary of the transit center site and adjacent public roadways. The proposed locations of the site investigative work are currently paved, impervious surfaces. Upon completion of the work, each investigative location would be patched to match the existing pavement conditions.

South Renton Transit Center and Roadway Improvements Project

No. For the transit center site, the existing impervious surfaces total approximately 363,000 square feet, nearly 100 percent of the site. The proposed transit center design would decrease impervious surface on the site itself, adding areas of open space and landscaping that would reduce the impervious surface areas on-site to approximately 287,000 square feet, a decrease of approximately 76,000 square feet.

Impervious surfaces associated with the roadway work would increase by approximately 6,000 square feet. Along Rainier Avenue South, north of South Grady Way, the roadway improvements would add approximately 9,000 square feet of new impervious surface, primarily through the removal of the center, vegetated median. Within the South Grady Way right-of-way, the Project would reduce the existing impervious surfaces by adding green space within the right-of-way north of the existing sidewalk, for a decrease of approximately 3,000 square feet. South of South Grady Way, along Rainier Avenue South, the Project would not add new impervious surfaces.

4. Describe how storm water is currently treated on the site?

This project site is located in the Green River subwatershed within Water Resource Inventory Area (WRIA) 9: Duwamish – Green. Stormwater runoff from the transit center parcels is currently collected and conveyed to a storm system within Rainier

Avenue South. Currently, stormwater on the South Renton Transit Center site is untreated. The City of Renton currently treats a portion of the Rainier Avenue South right-of-way. This system crosses Rainier Avenue South, north of South Grady Way, and conveys flow to Springbrook Creek. Runoff from South Grady Way is collected and conveyed south to Rolling Hills Creek through privately owned parcels south of South Grady Way. Rainier Avenue South has two drainage basins: north of South Grady Way, runoff from Rainier Avenue South is directed to Springbrook Creek, and south of South Grady Way, runoff is directed to Rolling Hills Creek.

5. How will storm water be treated on this site during construction and after the project is complete?

Early Borings and Design Investigations

The early borings and design investigations would not modify the existing stormwater system; runoff would continue to be conveyed to existing piped storm drainage and conveyance systems. A National Pollutant Discharge Elimination System (NPDES) permit is not required for this limited activity; however, a temporary sediment and erosion control plan (TESC) would be developed for the site to describe best management practices (BMP) that would be implemented during the site investigation activities.

South Renton Transit Center and Roadway Improvements Project

Construction of the South Renton Transit Center and the roadway improvements would be subject to NPDES construction-related stormwater permit requirements. Specific regulatory requirements are provided in the Western Washington Phase II Municipal Stormwater Permit, the Construction Stormwater General Permit, and the City of Renton's adopted surface water design manuals. Prior to the start of construction, a stormwater and pollution prevention plan will be prepared to identify BMPs to prevent or minimize the introduction of contaminants into surface waters and groundwater during construction activities. Such BMPs could include, but would not be limited to, silt fencing, straw bale barriers, fiber rolls, storm drain inlet protection, hydraulic mulch, street sweeping, and a stabilized construction entrance. The stormwater and pollution prevention plan would also include development of site-specific structural and operational BMPs to prevent and control impacts on runoff quality, measures to be implemented before each storm event, inspection and maintenance of BMPs, and monitoring of runoff quality by visual and/or analytical means.

The design of stormwater facilities would comply with the City of Renton's measures specifically aimed at protecting the Cedar Valley Sole Source Aquifer. Stormwater within the transit center site will be collected, with detention provided either above grade or below grade, depending on final site layout and regulatory requirements. Currently, compost-amended biofiltration swales are being evaluated for use on-site, upstream of existing catch basins. Stormwater facilities on the transit center site will continue to tie into the area's existing conveyance systems, with no new outfalls anticipated. Final flow control and water quality treatment design will be provided in

accordance with the 2017 *City of Renton Surface Water Design Manual*. Within the Rainier Avenue S/SR 167 right-of-way, stormwater would be collected underground and detention would be provided either above grade or below grade, depending on final design and requirements. Flow control and water quality treatment would be provided as required by the Washington State Department of Transportation (WSDOT) 2019 *Highway Runoff Manual*, and stormwater facilities would tie into the existing conveyance systems.

6. Are there any underground storage tanks present or to be installed? Include details of such tanks.

Historically, the transit center site included several underground storage tanks (USTs) and above ground storage tanks (ASTs) serving automotive-oriented businesses on-site. It is believed that all USTs were removed by previous property owners before the property was acquired in 2019 by Sound Transit. If unanticipated ASTs or USTs are encountered during construction of the Project or in conducting the early borings and design investigations, they will be removed and properly disposed of in accordance with the Washington State Department of Ecology (Ecology) regulations.

The Project, including the site investigative activities, does not include the installation of any USTs or ASTs.

7. Will there be any liquid or solid waste generated? If so how will it be disposed of?

Previous investigations at the transit center site have indicated the presence of petroleum hydrocarbon contamination in soils and groundwater, likely caused by previous activities and uses of the site.

Early Borings and Design Investigations

Solid or liquid wastes may be generated through this work, although they would be managed and contained by following the BMPs described in response to Question 12. Where contaminated spoils are encountered and removed from bore holes as part of any of the drilling or excavation efforts, investigation-derived waste (soil and groundwater) will be contained in 55-gallon drums and properly disposed of at a permitted facility in accordance with Ecology requirements. The drilling contractors will use best practices to contain suspected contaminants if encountered, and the drill rig will be decontaminated between borings. At locations where a groundwater monitoring well has not been constructed, the soil borings will be removed from the site and disposed of in accordance with Ecology requirements, and cuttings left at the surface during borings will be removed.

South Renton Transit Center and Roadway Improvements Project

Four structures associated with the previous uses on the site (Sound Ford and Sound Collision Center and Walkers Renton Mazda Dealership) currently remain on-site. Prior to demolishing these existing buildings, Sound Transit will conduct asbestos and lead surveys and will evaluate electrical building components for the presence of equipment containing polychlorinated biphenyls or mercury. If such materials are

identified, Sound Transit will remove and dispose of them in accordance with applicable regulations.

Sound Transit will complete cleanup of identified contaminated soil and groundwater during property redevelopment in coordination with Ecology; the site is designated by Ecology as Cleanup Site 6342. In compliance with the Model Toxics Control Act Cleanup Regulation (Washington Administrative Code (WAC) 173-340), a cleanup plan will be developed and implemented to minimize human exposure and for the proper removal and treatment or disposal of contaminated materials in soils or groundwater. All waste removed from the site will be disposed of in accordance with Ecology regulations.

During construction of the Project, all potentially hazardous construction materials used will be handled and stored in accordance with state and federal hazardous materials handling requirements. Procedures to identify, characterize, manage, handle, store, and dispose of contaminated soil and groundwater encountered during construction will be implemented. If unanticipated soil or groundwater contamination were encountered during construction activities, remediation of those materials would occur as needed.

8. What is the depth of excavation?

Early Borings and Design Investigations

The anticipated depth for each of the site investigations is described below:

- **Geoarchaeological borings** – Includes 15 archaeological borings that are planned to be conducted using a 2-inch-diameter, sleeved, direct-push geoprobe to a target depth of approximately 50 feet below ground surface (bgs).
- **Geotechnical borings** – Includes 11, 6-inch diameter machine-drilled borings that would reach a target depth of between 10 feet and 100 feet bgs.
- **Environmental Site Assessment Borings** – Includes 24, 2-inch-diameter boring explorations, using direct-push drilling methods, that would be advanced up to approximately 10 feet bgs or a few feet below first observed and encountered groundwater. The four water monitoring wells proposed on the north property line would be constructed using pre-pack well screens and would be installed between approximately 5 and 10 feet bgs.
- **Infiltration test pit** – One infiltration test pit, meeting the requirements of Ecology’s 2019 Stormwater Management Manual for Western Washington, would be approximately 5 to 10 feet deep and 100 square feet at the bottom.
- **Utility potholes** – Includes 33 utility potholes, typically 12 inches in diameter, are typically conducted to a depth of 3 to 6 feet bgs and would vary depending on the depth of the utility.

South Renton Transit Center and Roadway Improvements Project

Table 1 shows the anticipated maximum depth of excavation associated with development of each site component. The table shows likely depths of excavation for building foundations, electrical and traffic signal pole foundations, retaining walls, sidewalks, and utility work. Areas to be covered with pavement or concrete slabs would also involve excavation during construction. The table also includes the likely depth of potential pilings, if they are determined to be needed for the park-and-ride garage foundation (see also Question 11). Some of the proposed geotechnical borings would reach a greater depth than the estimated piling depth, as the purpose of the geotechnical borings is to better understand how to design for potential seismic considerations.

Table 1. Anticipated Maximum Depth of Excavation for Ground-Disturbing Construction Activities

Anticipated Construction Activity	Maximum depth of excavation or disturbance (bgs)
On-site structures (park-and-ride garage*, etc.)	10 feet*
<i>*Potential pilings for garage</i>	<i>*50 – 80 feet</i>
Utility trenching (water, dry utilities, Intelligent Transit System, etc.)	4 feet
Stormwater utility trenching and treatment facilities	6 feet
Sanitary sewer utility trenching	8 feet
Roadway pavement	4 feet
Sidewalks	Less than 1 foot
Retaining wall footings	8 feet
Relocation/new traffic signals (foundation up to 42-inch diameter)	20 feet
Relocation of utility/light poles (foundation of 24-inch diameter)	8 feet

SOURCE: Sound Transit 2019¹

9. Are there any wells in the area that may provide direct routes for contaminants to access the aquifer and how close are they to the project?

A search of the project area on the online Ecology Well Construction map and the City of Renton Public Works Department online found a wellfield in Downtown Renton, located in Liberty and Cedar River Parks, consisting of five drinking water wells that

¹ Sound Transit. 2019. *I-405 BRT Construction Methods Technical Memorandum*.

draw water from the Cedar Valley Sole Source Aquifer. There is sufficient distance between the wellfield and the construction activity for the Project (approximately 1.5 miles) that the potential for contaminants to access the aquifer via the wellfield is highly unlikely.

Currently there are seven groundwater monitoring wells on the proposed transit center site. Four new wells are proposed to be installed to evaluate the petroleum hydrocarbon contamination, and two short-term groundwater monitoring wells are proposed as part of the early borings work. Each soil boring/well will be completed in accordance with WAC 173-160 to prevent the downward migration of contaminants.

The drinking water wells located in the Downtown Renton wellfield were installed up to a depth of approximately 100 feet bgs. The six new groundwater wells associated with the Borings Program are to be installed at a depth of approximately 10 feet bgs. It is highly unlikely the new wells would provide a direct route to the Cedar Valley Sole Source Aquifer because the shallowest groundwater contained in the aquifer is 23 feet bgs.

10. Are there any hazardous waste sites in the project area, especially if the waste site has an underground plume with monitoring wells that may be disturbed? Include details.

The following provides a summary of the potential or known contamination at the transit center site and surrounding local streets.

Historic Regional Contamination

Regionally, more than 1,000 square miles of the Puget Sound Basin have been affected by arsenic, lead, and other heavy metals that settled on the surface of soils from air pollution from the historic operations of the Asarco Company copper smelter that was in Tacoma. A portion of the project area is included in the Ecology map of predicted concentrations of arsenic in soils of 20 to 40 parts per million, above Model Toxics Control Act (MTCA) cleanup levels.

Government Database Search

The data sources provided by Environmental Data Resources, Inc. include the following environmental agency records:

- Federal National Priorities List Site List
- Superfund Program Comprehensive Environmental Response, Compensation and Liability Act Information
- Federal Resource Conservation and Recovery Act Information System
- Washington State Confirmed and Suspected Contaminated Sites List
- Washington State Hazardous Sites List

- Washington State Independent Cleanup Reports List
- Washington State Landfill or Solid Waste Site Lists
- Washington State Leaking UST Lists
- Washington State Registered UST Lists
- Washington State Department of Ecology Online Database of Cleanup Sites

The transit center site has a prior regulatory action reported within government environmental database records. The site has been assigned an Ecology Cleanup Site identification number (6342) and is labeled as “undergoing cleanup.” There is no information available in regard to who is leading the cleanup action.

Six additional sites have been identified in the vicinity of this Project, between 100 to 800 feet from the proposed transit center. Two of the six sites, Renton Lincoln Mercury and Les Schwab Tires Renton, both approximately 200 feet from the proposed transit center, have received a “no further action” letter from Ecology following cleanup activities. The remaining four sites are between 100 and 800 feet from the transit center site and are undergoing remedial actions. All four sites are identified as having known groundwater contamination. The chemicals of concern listed at these sites were benzene, lead, metals-other, petroleum-other, polycyclic aromatic hydrocarbons (PAHs), metals priority pollutants, non-halogenated solvents, petroleum-gasoline, and/or petroleum products-unspecified.

Previous Environmental Site Assessments

As part of the property acquisition process, Sound Transit completed Phase I² and Phase II³ ESAs for the transit center property. The analytical data and field observations of the Phase II ESA identified the following constituents in soil, and groundwater: petroleum hydrocarbons as diesel, gasoline, and motor oil; benzene, toluene, ethylbenzene, and xylene; PAHs; and metals including arsenic, chromium, and lead.

Planned Hazardous Materials Investigation

Part of the proposed site investigative work includes environmental site assessment borings to further investigate contaminated soil and groundwater on the transit center site. The information obtained during these investigations will serve to develop procedures to identify, characterize, manage, handle, store, and dispose of

² Shannon & Wilson, Inc. 2017. Phase I Environmental Site Assessment, Sound Transit Right-of-Way #RTN0001 through RTN004 Sound Ford Property, 750 Rainier Avenue S. and 200 S. Grady Way Renton, Washington.

³ Shannon & Wilson, Inc. 2018. Phase II Environmental Site Assessment, Sound Transit Right-of-Way #RTN0001 through RTN004 Sound Ford Property, 750 Rainier Avenue S. and 200 S. Grady Way Renton, Washington.

contaminated soil and groundwater encountered during the construction activities to prevent harm to both construction workers and the general public. When conducting the early boring and design investigations, BMPs would be implemented as described in Question 12. This includes commitments to adhere to all applicable state and federal regulations.

11. Are there any deep pilings that may provide access to the aquifer?

In the project area, the depth from ground surface to the water table is variable. Based on information from prior geotechnical borings on the transit center site, groundwater was encountered at a depth of 9 to 17 feet bgs. The alluvium layer that is thought to contain the aquifer was first encountered at a depth of 7.5 feet bgs and continued to the full depth of the geotechnical explorations (up to 81.5 feet bgs).

Early Borings and Design Investigations

No pilings are proposed.

South Renton Transit Center and Roadway Improvements Project

No, the transit center project is not anticipated to result in creating a conduit to the aquifer. The final design and construction methods for the foundation of the park-and-ride garage on the transit center site are yet to be determined. The geotechnical borings proposed with the site investigative work will help inform the design. As noted in Table 1, if the garage foundation is dug, the currently anticipated potential foundation depth is 10 feet. If, based on geotechnical information, piles are used to construct the foundation of the park-and-ride garage, the estimated pile length is 50 to 80 feet. While construction of the park-and-ride garage may require a foundation system of pilings or drilled shafts with a potential depth of up to 80 feet, these are not anticipated to be a conduit to the aquifer as the construction methods would include grouting as a sealant around the pile.

12. Are Best Management Practices planned to address any possible risks or concerns?

The Project includes the following Best Management Practices.

Early Borings and Design Investigations

A TESCP will be developed and will include BMPs, such as catch basin protection, which will be used to minimize the risk of turbid water leaving the site, thereby mitigating risk to the Cedar Valley Sole Source Aquifer.

The drill rig will be decontaminated between borings in accordance with a decontamination plan in order to not cross-contaminate between bore holes. After borings in paved areas reach target depth, the boreholes will be abandoned in accordance with Ecology requirements and cuttings at the surface will be removed. Investigation-derived waste (soil and groundwater) will be contained in 55-gallon drums and properly disposed of at a permitted facility.

Surface restoration for boreholes advanced through pavement would consist of backfilling the borehole with bentonite chips per Ecology requirements to the base of the pavement section, then matching the existing pavement thickness with cold patch. Groundwater monitoring wells would be installed in accordance with Ecology requirements. A flush-mounted monitoring well monument cover would be located directly over these groundwater monitoring wells. Prior to construction, the monitoring wells would be decommissioned by the contractor in accordance with Ecology requirements.

The test pit would meet the requirements of Ecology's 2019 *Stormwater Management Manual for Western Washington*.

For utility potholing activities, each pothole would be backfilled with the removed soil, compacted, and capped with asphalt or material consistent with the surrounding area. Restoration will be as required by the City of Renton Standard Right-of-Way Use Permit and WSDOT General Permit.

South Renton Transit Center and Roadway Improvements Project

Soils will be sampled and analyzed in accordance with Ecology's 2019 *Tacoma Smelter Plume Model Remedies Guidance* prior to initiation of site disturbance activities to determine if the site has been contaminated by emissions from the Asarco Company smelter, and the extent of any such contamination. If arsenic or lead above MTCA cleanup levels is encountered, cleanup of those materials will be coordinated with Ecology, and remediation of those materials would occur as needed as part of the site cleanup now planned for petroleum contamination. The soil remediation plan that would be prepared would minimize human exposure and ensure proper removal and treatment or disposal of contaminated materials in soils or groundwater.

Sound Transit has completed a limited hazardous materials survey that evaluated asbestos and lead within the existing structures to be removed and evaluate electrical components for the presence of electrical equipment containing PCBs or mercury. Sound Transit would remove and dispose of them in accordance with regulations.

The South Renton Transit Center site is designated by Ecology as Cleanup Site 6342. Given the contamination at the site, during project construction Sound Transit would address the cleanup of identified contaminated soil and groundwater in coordination with Ecology and its requirements. Sound Transit would also prepare an Environmental Compliance Strategy Plan to help track regulatory compliance through project construction.

A NPDES Construction Stormwater Permit would be obtained for the construction activities. BMPs would be implemented during construction to avoid or minimize possible environmental risks. A TESCP would be prepared, implemented, and kept on-site. The potential for erosion would be further minimized by adherence to BMPs approved by Ecology and the City of Renton. Construction BMPs would include, but not be limited to, designated construction entrances, silt fencing, sediment traps, dust suppression, application of seeding or mulching for soil stabilization, as well as other

techniques in accordance with the NPDES Construction Stormwater General Permit requirements.

A stormwater and pollution prevention plan would be prepared identifying BMPs to prevent or minimize the introduction of contaminants into surface waters and groundwater during construction activities. BMPs for the Project could include, but not be limited to, silt fencing, straw bale barriers, fiber rolls, storm drain inlet protection, hydraulic mulch, street sweeping, and a stabilized construction entrance. The stormwater and pollution prevention plan will also include development of site-specific structural and operational BMPs to prevent and control impacts on runoff quality, measures to be implemented before each storm event, inspection and maintenance of BMPs, and monitoring of runoff quality by visual and/or analytical means.

13. Is there any other information that could be helpful in determining if this project may have an effect on the aquifer?

Early Borings and Design Investigations

All of the site investigations conducted as part of the Borings Program are short-duration field activities (with a total duration of days in the field estimated to be between 2 and 5 weeks of field work), and they will be closely coordinated with each other. The program's purpose is to collect data to aid in developing the final site cleanup approach and inform best design for the site considering contamination and groundwater levels.

South Renton Transit Center and Roadway Improvements Project

The Project will not have temporary construction or long-term impacts to wetlands, streams, or other hydrologic resources in the area.

14. Does this Project include any improvements that may be beneficial to the aquifer, such as improvements to the wastewater treatment plan?

Early Borings and Design Investigations

The contaminated soil and groundwater investigation is being conducted to determine an approach to remediate the historic soil and groundwater contamination on the South Renton Transit Center site. Site remediation would occur early during construction of the transit center project once the on-site buildings have been demolished. The Project's proposed site remediation will address this contamination and minimize future potential effects to human health and the environment from exposure and limit further migration, including potential for future interactions with the Cedar Valley Sole Source Aquifer.

South Renton Transit Center and Roadway Improvements Project

The stormwater treatment facilities constructed for the Project will collect and retain stormwater and provide stormwater treatment to current standards, improving quality of surface waters leaving the site and ultimately the Cedar Valley Sole Source Aquifer.

The EPA Sole Source Aquifer Program may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

Figure 1. Cedar Valley Sole Source Aquifer and Location of Project

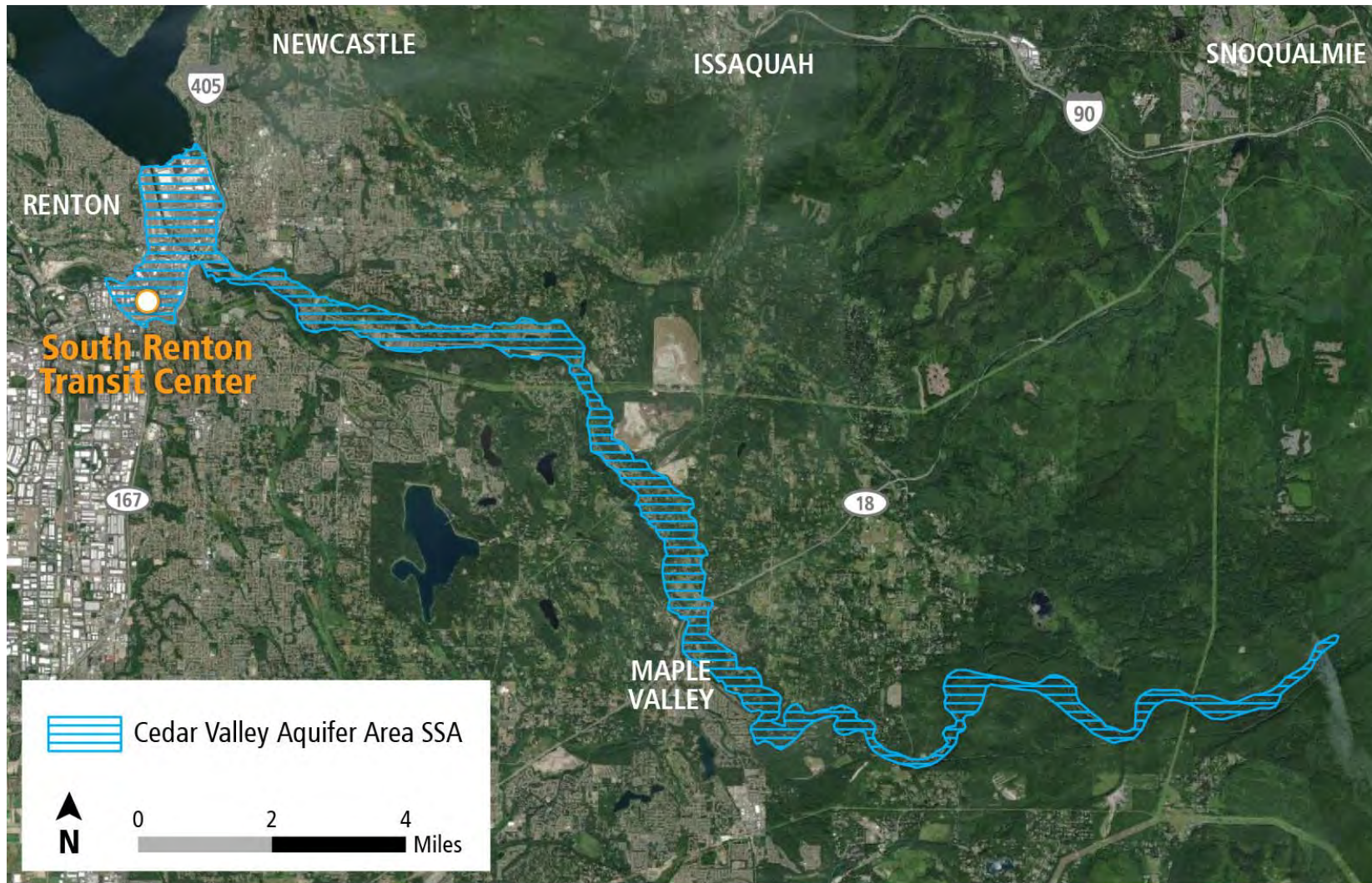


Figure 2. South Renton Transit Center and Roadway Improvements Project Location

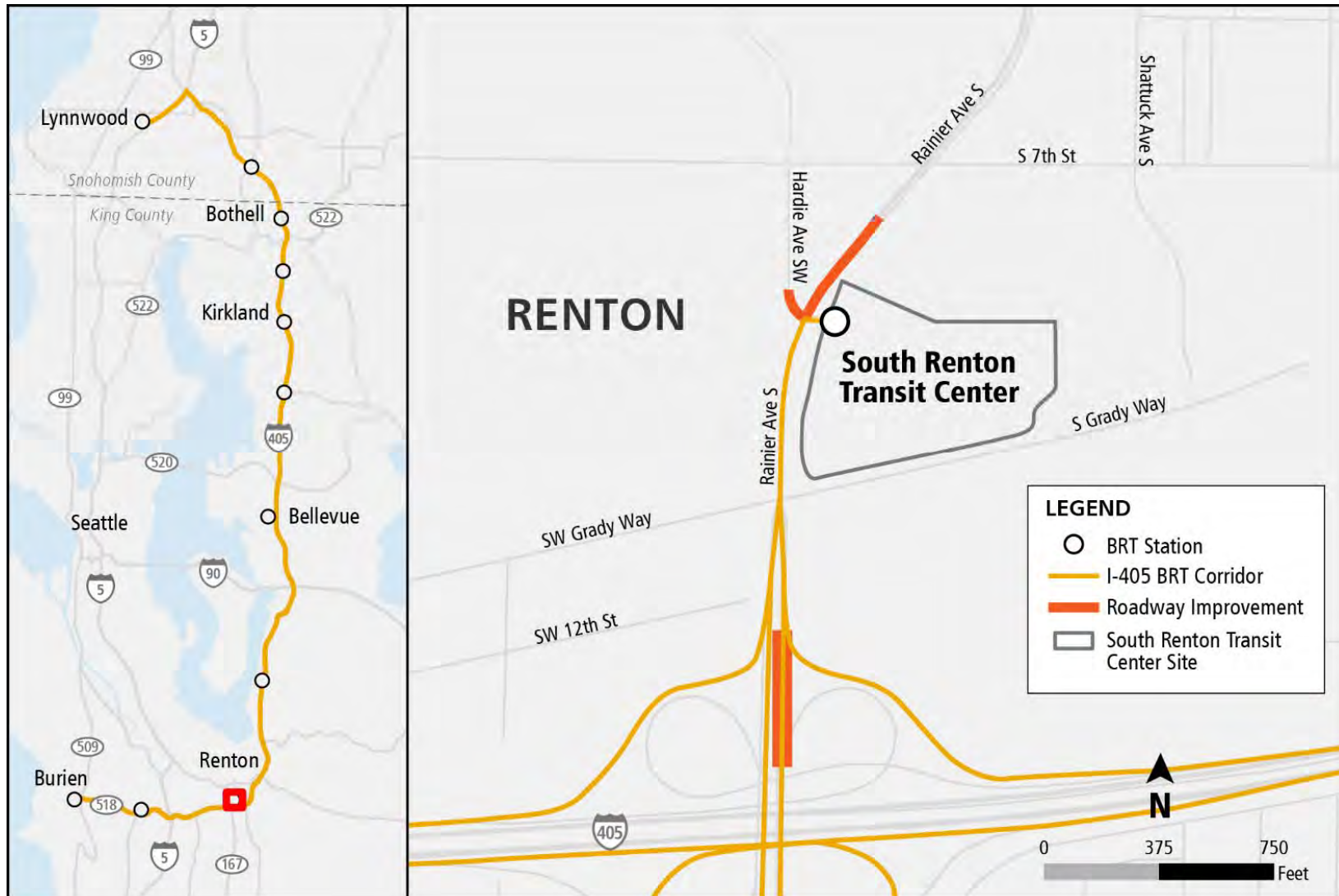


Figure 3. South Renton Transit Center and Roadway Improvements: Early Borings and Design Investigations

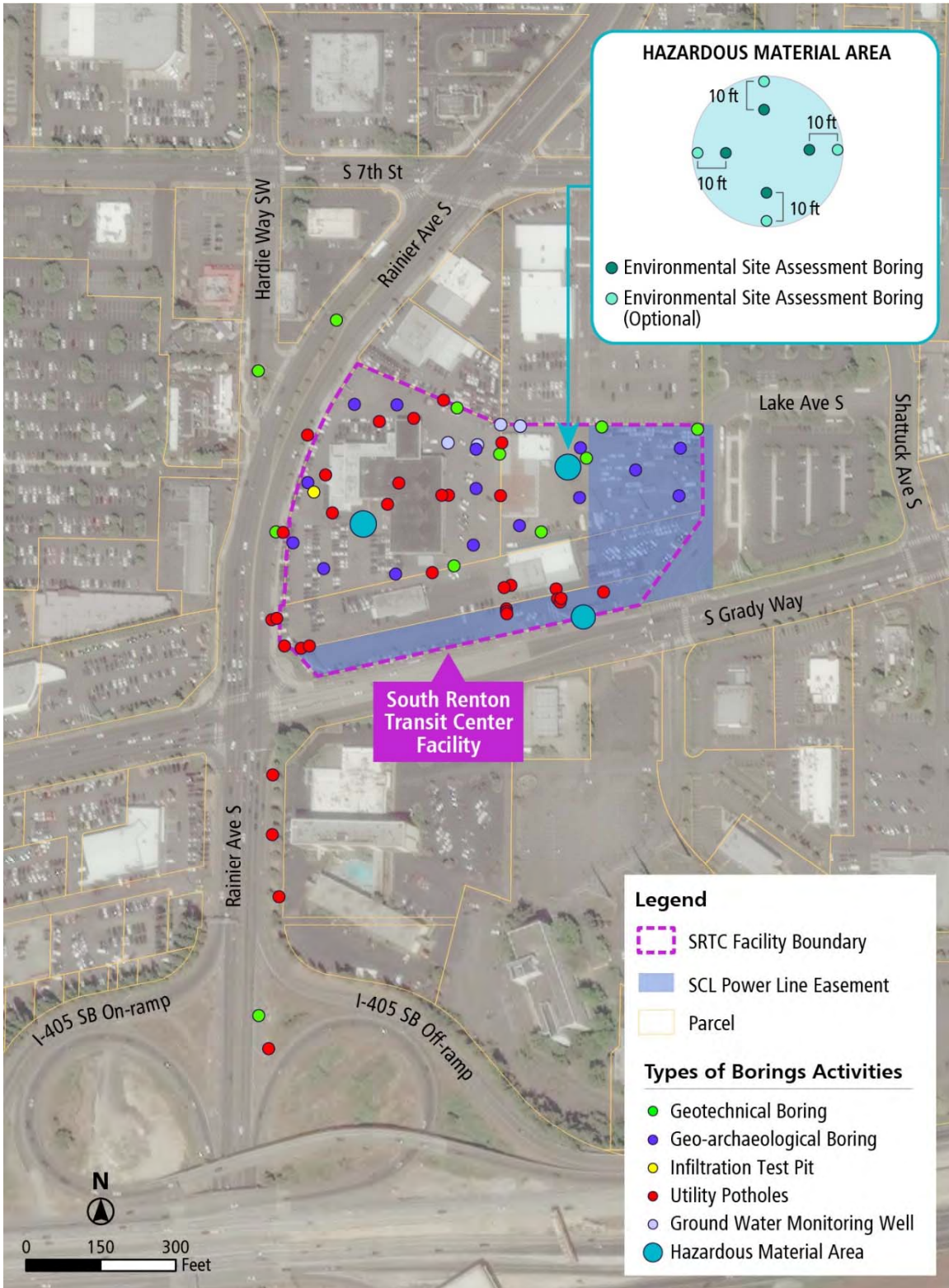
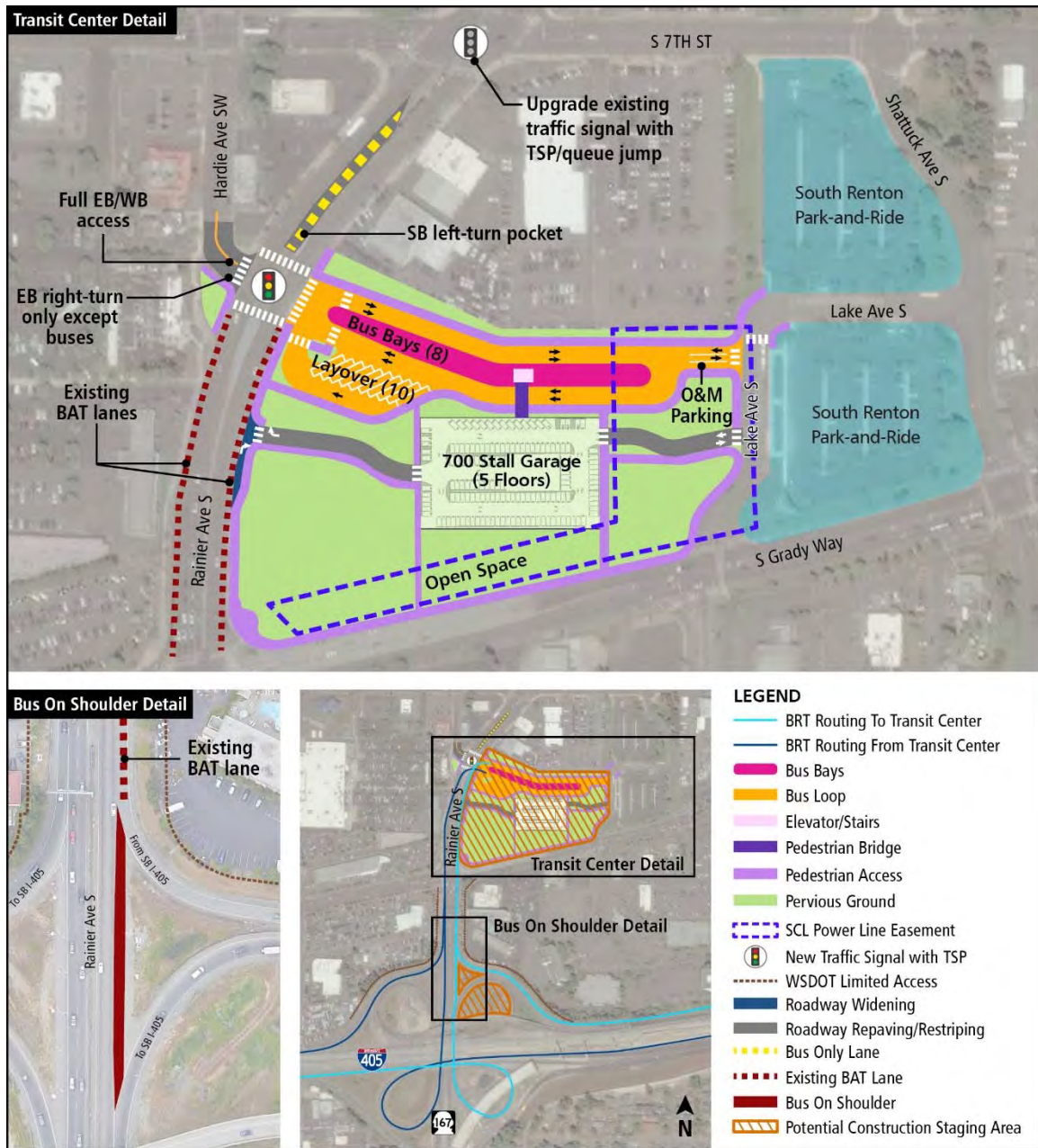


Figure 4. South Renton Transit Center and Roadway Improvements Project



From: [Gross, Ryan](#)
To: [Assam, Mark \(FTA\)](#)
Cc: [Fendt, Kathy](#); [Ziglar, Kristine \(FTA\)](#); [Changhchien, Amy](#); [Costanza, Ann](#); [fta.tro10mail](#)
Subject: RE: Sound Transit - South Renton Transit Center and Roadway Improvements Project with Early Borings and Design Investigations - Sole Source Aquifer Checklist
Date: Monday, May 3, 2021 4:45:50 PM

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the “fish” button in Outlook. Thank you! ST Information Security

Good afternoon,

Thank you for submitting your project information to the US EPA Region 10 Sole Source Aquifer Program. The Sole Source Aquifer Program reviews projects that are both proposed in a federally-designated Sole Source Aquifer review area and receive federal financial assistance. We review information submitted by project proponents to determine if the action has a potential to endanger human health by contaminating the aquifer.

We have completed our review of the [Sound Transit - South Renton Transit Center and Roadway Improvements Project in Renton, Washington](#). We find that the project, **as described in your submission**, will not have a significant adverse impact on the [Cedar Valley Aquifer Area SSA](#). Therefore, the federal funding for the project may proceed.

This correspondence only addresses requirements of the EPA Sole Source Aquifer Program. You are responsible for complying with any other federal environmental requirements.

Please retain this email for your records.

V/R,
Ryan Gross

Ryan Gross, P.E.
US EPA Region 10 - Groundwater & Drinking Water Section
1200 Sixth Ave, Suite 155, MS 19-H16, Seattle, WA 98101
ph. 206-553-6293

From: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Sent: Tuesday, April 20, 2021 10:05 AM
To: Gross, Ryan <Gross.Ryan@epa.gov>
Cc: Fendt, Kathy <kathy.fendt@soundtransit.org>; Ziglar, Kristine (FTA) <Kristine.Ziglar@dot.gov>; amy.changhchien@dot.gov; Costanza, Ann <acostanza@anchorqea.com>; fta.tro10mail <fta.tro10mail@dot.gov>
Subject: Sound Transit - South Renton Transit Center and Roadway Improvements Project with Early Borings and Design Investigations - Sole Source Aquifer Checklist

Hi Ryan,

Attached for your review is a completed Sole Source Aquifer Checklist (with attachments) for the Sound Transit - South Renton Transit Center and Roadway Improvements Project with Early Borings and Design Investigations. Please review and let me know if you have questions or concerns.

Thanks,

Mark A. Assam, AICP
U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov