



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

Ms. Sarah Fox
Planner
City of Camas
616 NE 4th Avenue
Camas, WA 98607

In future correspondence please refer to:

Log: 022415-19-CL

Property: Cultural Resources Investigation of the Green Mountain Mixed use PRD Project Area, Clark County, Washington

Re: Archaeology – Revised Comments, Permits from DAHP Required

Dear Ms. Fox:

Please see this revised letter. I did not review a more recent report for this project and was in error in my first letter. Please accept this as our final comment for this project.

Archaeological Services of Clark County (ASCC) prepared *Cultural Resources Investigation of the Green Mountain Mixed Use PRD Project Area, Clark County, WA* which included additional survey and boundary delineation and made the following recommendations. Our requirement/concurrences are bolded:

Site 45CL1057

Containing both historic and pre-contact components, Site 45CL1057 is centered on the above-ground remains of the Lechtenberg-Gratton Farm, a location relatively undisturbed by the ca. 1998 construction of the Green Mountain Golf Course. ASCC recommends controlled archaeological testing of the pre-contact component of Site 45CL1057. ASCC does not interpret the site's historic component as significant.

We agree with the recommendation for additional archaeological work. The DAHP permit application should be submitted for formal archaeological testing with the purpose of determining appropriate mitigation eg. archaeological data recovery, archaeological monitoring and/or Inadvertent Discovery Plan. We do not concur the historic archaeological component is not significant and provisions for historical archaeology should be included in the above permit application. Archaeological evidence often refines archival information such as that contained in O'Brien (1993)

ASCC recommends that the Lechtenberg-Gratton stone spring house be preserved, either in situ (ideally) or in a new location. The stone building represents a unique piece of Clark County's 19th-century heritage, and ASCC's opinion is that its historical, architectural, and aesthetic characteristics will retain value within the proposed community.



We concur with the recommendation and would like to see the structure preserved. If this is not possible we recommend consultation with DAHP as to whether further documentation of any of the structure at the Lechtenberg-Gratton Farm is warranted.

Site 45CL426

ASCC's professional opinion is that Site 45CL426 has very little potential to yield additional, non-redundant data. Since only the disturbed portions of the site will be impacted by the proposed project, ASCC's professional opinion is that further archaeological work at Site 45CL426 is unwarranted, and that project activities at the site can proceed as planned. Any proposed ground disturbance within the site will require an excavation permit from DAHP, entailing a consultation process with interested parties (including relevant Tribes) to formalize an appropriate research design.

We concur that if the site cannot be avoided then an excavation permit from DAHP will be required under RCW 27.53. Permit conditions for appropriate archaeological work can be finalized at a later date.

Site 45CL1058

Given the small size of the site and the fact that projectile points are often found as isolates in Clark County, ASCC considers the site to offer little potential for additional data. However, to address the possibility of an association with Site 45CL1056, ASCC recommends the excavation of a single 50x50cm test unit at Site 45CL1058 prior to any ground disturbance. This controlled excavation will serve to test both the possible relationship with the neighboring site and the site's overall potential for data. Any proposed ground disturbance within the site will require an excavation permit from DAHP, entailing a consultation process with interested parties (including relevant Tribes) to formalize an appropriate research design.

We concur that if the site cannot be avoided then an excavation permit from DAHP will be required under RCW 27.53. Permit conditions for appropriate archaeological work can be finalized at a later date..

Site 45CL720

This site is set entirely within green space where no development is proposed, due in large part to habitat issues. Given that no impacts are proposed to Site 45CL720, ASCC recommends no further study of the site at this time. As above, this will require an excavation permit via consultation with DAHP and other interested parties.

We concur that if the site cannot be avoided then an excavation permit from DAHP will be required under RCW 27.53. Permit conditions for appropriate archaeological work can be finalized at a later date.

Site 45CL1096

To address the possibility that intact site deposits lie preserved below the layers of golf course fill, ASCC recommends archaeological monitoring of initial ground disturbance within the boundaries of Site 45CL1096, specifically to the point where intact soils are first revealed. Here, the presence of any features or diagnostic artifacts in a primary context would constitute evidence for site significance.

Any ground disturbance within the boundaries of Site 45CL1096 will require an excavation permit from DAHP, entailing a consultation process with interested parties.

DAHP concurs with the above.

Site 45CL535

ASCC found no remains of the Green Mountain Mine Site except for the amphitheater-like quarry itself. ASCC recommends no further archaeological work at Site 45CL535, but also recommends that impacts to the mine should be avoided. As ASCC understands development plans, no impacts are forthcoming. Set on a boulder-strewn scarp poorly suited to development, the mine's location appears as green space on existing project plans. Should any ground-disturbing impacts be slated at the site, project proponents will require a DAHP excavation permit that addresses mitigation for these impacts.

DAHP concur with the above.

Site 45CL1091

Per Washington State law, any project-related ground disturbance at Site 45CL1091 will require consultation with DAHP and the issuance of a DAHP excavation permit.

DAHP concurs with the above.

Site 45CL1090

This site consists of two pieces of CCS debitage found in disturbed/fill sediments. For the reasons discussed under Site 45CL1091, ASCC recommends no further work at Site 45CL1090. No site integrity is apparent, and the artifacts may have been pushed here with fill sediment taken from elsewhere. As above, any disturbance to this site will require consultation with DAHP and the issuance of a DAHP excavation permit.

We concur that if the site cannot be avoided then an excavation permit from DAHP will be required under RCW 27.53. Permit conditions for appropriate archaeological work can be finalized at a later date.

Isolated Finds

ASCC has identified six isolate finds within the project area.

Isolates do not require permits from DAHP because by definition they are archaeological sites.

Please

Sincerely,

A handwritten signature in blue ink, appearing to read "Gretchen Kaehler", with a long horizontal flourish extending to the right.

Gretchen Kaehler
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cc. Alex Gall, Principal, ASCC
dAVE Burlingame, Cultural Resources, Cowlitz Tribe
Dave Harrelson, THPO, Grand Ronde Tribes
Johnson Meninick, Cultural Resources, Yakama Nation
Richard Bellon, Archaeologist, Chehalis Tribe
Sally Bird, Cultural Resources, Warm Springs Tribes
Michael Houser, State Architectural Historian, DAHP
Stephenie Kramer, Permit and Violations Coordinator, DAHP