

**Appendix A:  
Monitoring and Inadvertent Discovery Plan**

**Archaeological Monitoring and Inadvertent Discovery Plan  
(MIDP)**

**City of Port Townsend Holcomb and Wilson Sewer Upsizing  
Project, Jefferson County, Washington**

**August 2025**

Prepared by  
Willamette Cultural Resources Associates, Ltd., Seattle, WA

Prepared for:  
City of Port Townsend



**WILLAMETTE**  
CULTURAL RESOURCES ASSOCIATES, LTD.

## **Background**

The City of Port Townsend (City) is proposing to replace 1,600 feet of sewer line between Holcomb Street and Wilson Street in Port Townsend, Washington, within Section 10 in Township 30 North, Range 1 West (Figure 1). The existing 8-inch gravity sewer installed between the 1940s–1970s will be replaced by a new 18-inch gravity sewer. The Project will rely on open cut trenching to remove the old pipe and install the new pipe except across Sims Way (SR20) where directional drilling under the roadway may be used. Staging areas will be confined to existing roads and the utility easements, the latter within 5 feet of either side of the sewer line. Ground disturbance is expected to extend 15 feet below ground surface. WillametteCRA recommends archaeological monitoring during trenching in three portions of the Project Area where there is greater risk of encountering historic resources (Figure 2).

The regulatory nexus for this Project is SEPA and this MIDP defines procedures to ensure compliance with Washington state laws, including the 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). It is important that any “discovered” human remains and associated cultural materials and deposits be treated with care and respect and be protected from further disturbance and exposure to weather. Compliance with all applicable laws pertaining to archaeological resources and with human remains is required. Failure to comply with these requirements could result in possible misdemeanor or civil penalties and/or constitute a Class C felony.

### **Goal of Archaeological Monitoring During Construction**

Archaeological monitoring is defined as the observation by a professional archaeologist of ground-disturbing construction activities conducted by others. The goal of archaeological monitoring during construction is to identify extent and depth of fill, contents of the fill, presence of native sediments or buried surfaces, and presence or absence of archaeological material.

Prior to archaeological monitoring, WillametteCRA will notify affected Tribes including the Jamestown S’Klallam Tribe, the Port Gamble S’Klallam Tribe, the Lower Elwha Klallam Tribe, and the Suquamish Tribe.

In the event archaeological cultural materials or human remains are encountered during construction, work will be halted and protocols described in the section below titled “Human Remains” will be followed.

### **Archaeological Team Qualifications and Structure**

The Project Archaeologist will oversee the implementation of the MIDP and the day-to-day coordination of monitoring during construction. The Project Archaeologist shall meet the National Park Service, Department of the Interior qualifications for professional archaeologists

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set forth in the *Federal Register* (1983, Volume 48, No. 190:44739). The Project Archaeologist will report to the City of Port Townsend or their designee. The Project Archaeologist will oversee an Archaeological Monitor. The Archaeological Monitor, who will have a BA degree in archaeology and extensive Puget Sound and monitoring experience, will be on site to observe construction activities.

### **On-Site Procedures**

To ensure compliance with Washington statutes, the following procedures have been developed to address potential inadvertent discoveries of archaeological resources (as defined in RCW 27.53) during ground-disturbing activities at the Project location.

An Archaeological Monitor will be present to provide a brief tailgate training and examine contents of the fill at the initiation of the ground disturbance. In the two designated archaeological monitoring areas shown in Figure 2 below, they will observe all ground disturbance below fill and above glacial sediment. After the initiation of ground disturbing activities and sufficient time to observe the extent and contents of the fill to ensure that it does not contain culturally sensitive materials, the Project Archaeologist and Archaeological Monitor, in coordination with cultural resources representatives from affected Tribes, will provide a recommendation to the City of Port Townsend Project Manager regarding level of effort for archaeological monitoring. WillametteCRA may recommend archaeological monitoring continue only below a certain depth or in certain areas.

The Archaeological Monitor will keep daily monitoring logs and take photographs to document ground disturbance. The Archaeological Monitor will inspect sediments as they are removed. The Archaeological Monitor will photograph and make notes on the composition and depth of observed soils. If cultural deposits are observed or suspected, the Archaeological Monitor will describe the deposits with a soil description, specifically noting the interface between cultural and sterile soils, and measurement of the cultural layers. The Archaeological Monitor may screen suspected or confirmed cultural material through ¼-inch mesh unless the sample is suspected to be contaminated, and it would not be best practice to agitate the sample. Artifacts will be described and photographed but no artifacts or samples will be collected.

### **Archaeological Discovery**

If the Archaeological Monitor or other Project staff observes evidence of archaeological materials, they will stop work and provide the Project Archaeologist with notification of the discovery as soon as possible. The notification will include a description and photographs of the discovery, as well as any indication of whether the archaeological materials are disturbed or intact. After assessing the find, the Project Archaeologist will notify the City of Port Townsend Project Manager or their designee. Once the Project Archaeologist and DAHP have reached an agreed assessment of the of the find, next steps can be taken. If warranted, the City of Port

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Townsend will coordinate with DAHP and affected Tribes regarding project effects to the archaeological materials.

### Materials NOT Requiring Notification

The following types of materials are presumed to not be protected under state law, and would not require notification:

- Isolated historic debris;
- Items less than 50 years old;
- Remains of infrastructure including abandoned utilities;
- Loose bricks, mortar, or other architectural debris; and
- Historic-era artifacts within unstratified fill that are not associated with a feature or stable surface.

The archaeological monitor will note the presence of these items in daily monitoring logs.

### Human Remains

In the event that human remains are encountered at any time, whether or not the Archaeological Monitor is on-site, state law (RCW 27.44.055) requires all activity to cease that may cause further disturbance to those remains, and the area secured and protected from further disturbance. The following protocol will be followed:

- **Stop** immediately all ground-disturbing activity within 50 ft. of the discovery.
- **Secure** the site immediately from any possible disturbance. The remains will be immediately covered and not removed from the sample unless necessary to prevent damage. Machines and associated sediment will remain on site so that an archaeologist can check material excavated nearby.
- **Ensure** at all times that any discovered human remains are treated with dignity and respect.
- **Contact** the WillametteCRA Project Archaeologist who will contact the City of Port Townsend Project Manager immediately. The Project Archaeologist will then contact the Jefferson County Sheriff in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The Medical Examiner will assume jurisdiction over the human skeletal remains and determine whether those remains are forensic or non-forensic. If the Medical Examiner determines the remains are non-forensic, they will report that finding to the DAHP, who will then take jurisdiction over the remains. The DAHP will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will determine whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and the affected tribes. The DAHP will

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then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

### **Reporting**

The Archaeological Monitor will complete daily monitoring logs and photographic records of monitoring observations. If archaeological resources are identified, an Archaeological Site Form will be prepared. The Project Archaeologist will direct preparation of a draft report with the results of the monitoring for the City of Port Townsend or their designee to review; the site form (if necessary) will be included as an appendix. The monitoring report will include recommendations for archaeological monitoring for any future phases of work in the Project Area. The City of Port Townsend will provide comments on the draft monitoring report and the Project Archaeologist will finalize the monitoring report for and upload to WISAARD for review by DAHP and Tribes.

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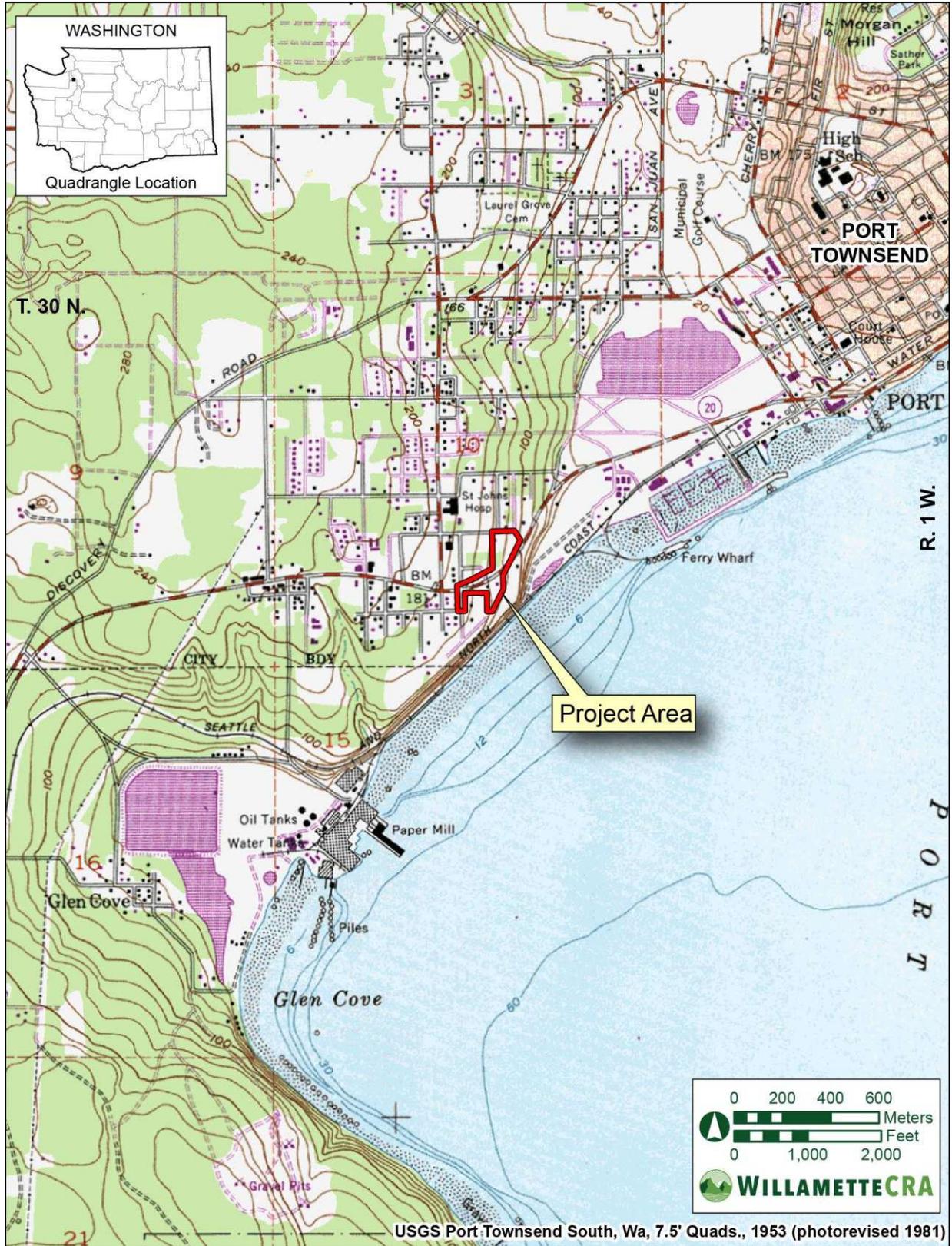


Figure 1. Location of the Project Area shown on a topographic map.

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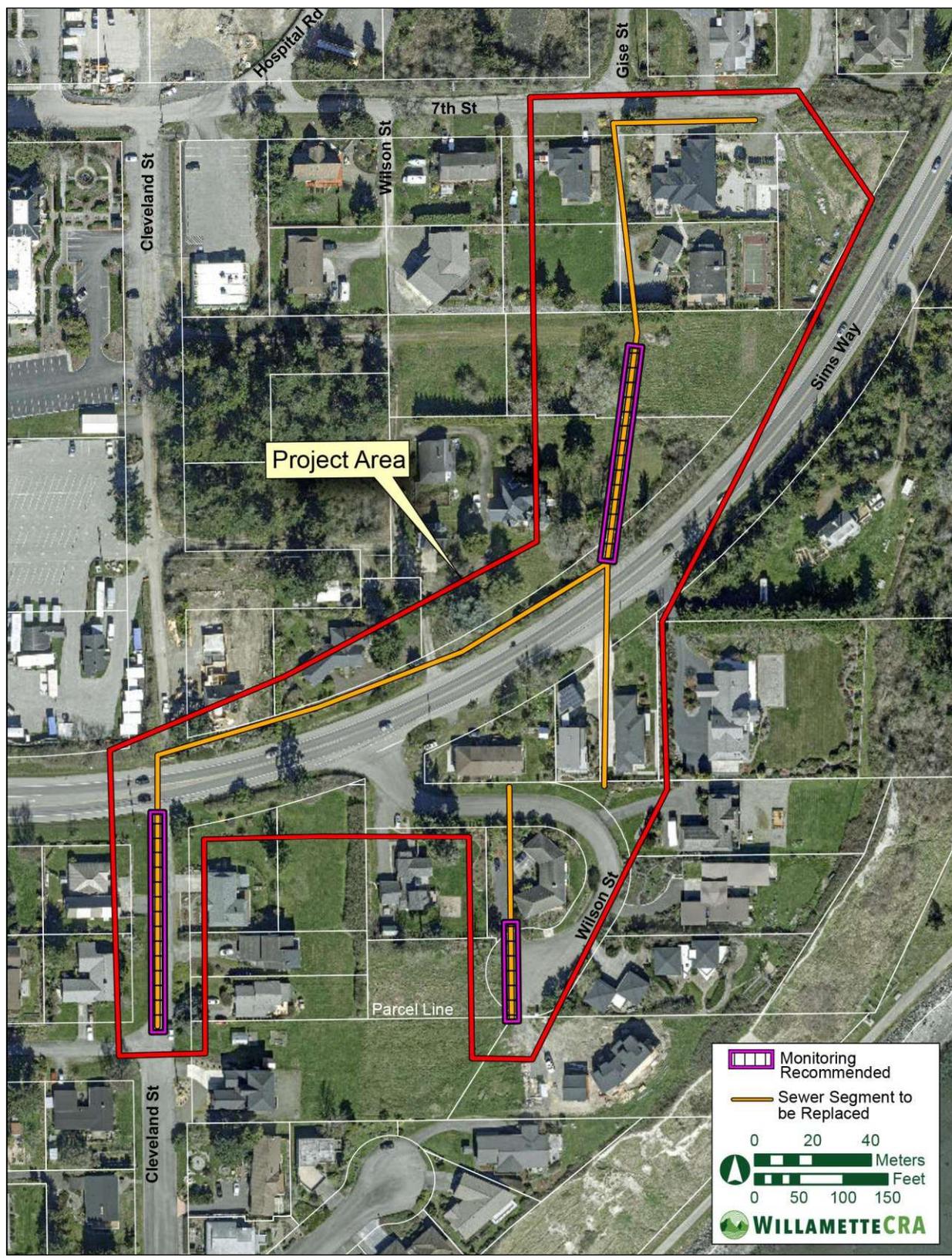


Figure 2. Project Area shown with recommended monitoring areas highlighted in purple boxes.

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City of Port Townsend Holcomb Sewer MIDP

**Contact Information for Monitoring and Inadvertent Discovery Plan**

(to be finalized before start of construction)

Tribe/Agency/Organization	Contact Name	Email Address	Phone Number
City of Port Townsend	Mike Connelly	<a href="mailto:mconnelly@cityofpt.us">mconnelly@cityofpt.us</a>	(360) 531-2761
(Contractor) Primary Field Contact	TBD	TBD	TBD
Willamette Cultural Resources Associates, Ltd. (Project Archaeologist)	Amanda Taylor	<a href="mailto:amanda@willamettecra.com">amanda@willamettecra.com</a>	(206) 214-8506
Willamette Cultural Resources Associates, Ltd. (Archaeological Monitor)	TBD	TBD	TBD
DAHP Local Government Archaeologist	TBD	TBD	TBD
State Physical Anthropologist	Dr. Guy Tasa	<a href="mailto:Guy.Tasa@dahp.wa.gov">Guy.Tasa@dahp.wa.gov</a>	(360) 586-3534
Jefferson County Sherrif	Andy Pernsteiner	<a href="mailto:jcsadmin@co.jefferson.wa.us">jcsadmin@co.jefferson.wa.us</a>	360-344-9779
Jamestown S'Klallam Tribe	Allie Taylor, THPO	<a href="mailto:THPO@jamestowntribe.org">THPO@jamestowntribe.org</a>	(360) 681-4638
Port Gamble S'Klallam Tribe	Misty Ives, THPO	<a href="mailto:pgst-thpo@pgst.nsn.us">pgst-thpo@pgst.nsn.us</a>	(360) 297-6359
Lower Elwha Klallam Tribe	Bill White, Archaeologist	<a href="mailto:Bill.white@elwha.org">Bill.white@elwha.org</a>	(360) 452-8471 x. 7438
Suquamish Tribe	Stephanie Trudel, THPO	<a href="mailto:strudel@Suquamish.nsn.us">strudel@Suquamish.nsn.us</a>	(360) 394-8533

## **Examples of Archaeological Resources**

A cultural resource discovery could be prehistoric or historic and consist of, but not be limited to:

- areas or bands of charcoal or charcoal-stained soil and stones; burned earth that is orange in color;
- stone tools or waste flakes (i.e., an arrowhead, or stone chips);
- buried fire pits or ovens, clusters of fire cracked rock;
- clusters of shell and/or animal bones, especially if associated with burned rocks, fire cracked rock, charcoal and/or stone tools; and
- prepared surfaces that suggest temporary stability, such as a corduroy road, a flat lying layer of brick, a plastered surface, a plank surface;
- old privies; wood pipes or infrastructure older than 50 years;
- buried foundations or intact walls;
- a cluster of cans or bottles, logging, industrial or agricultural equipment older than 50 years.

Collection of any archaeological materials by employees, construction personnel, or others with access to the project is prohibited by state laws.

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City of Port Townsend Holcomb Sewer Replacement MIDP, August 2025



Types of historic artifacts recovered from an historic archaeological debris scatter (example only).



Variety of the types of historic bottles recovered from an historic archaeological debris scatter (example only).

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Brick road pavement (example only).



Precontact shell midden archaeological resource (example only).

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Precontact stone tools (example only).



Precontact stone tools (example only).

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Charcoal bands (black) and burned earth (orange) at a precontact archaeological site (example only).



Camas oven, fire cracked rock feature at a precontact archaeological site (example only).