

Senior Environmental Scientist

505 S. 336th St. | Federal Way, WA 98422
P 253.237.5928 | M 206.818.2600



From: Elenga, Maureen (DAHP) <Maureen.Elenga@dahp.wa.gov>
Sent: Thursday, April 6, 2023 3:48 PM
To: Schwertner, Margaret <mschwertner@moffattnichol.com>
Cc: Wardlaw, Dennis (DAHP) <Dennis.Wardlaw@dahp.wa.gov>; Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>
Subject: RE: Section 106 Review for USDOT MARAD and Port of Ilwaco (POI) East Bulkhead Project (2022-06-04226)

Hi Barbara,

Please find the attached letter regarding the revised APE for the Port of Ilwaco East Bulkhead Resilience Project. Thank you for keeping us informed about your outreach to the tribes. We look forward to reviewing the additional inventories and updated report. Feel free to reach out with any questions.

Best regards,

Maureen Elenga, M.A. | *Architectural Historian – Transportation Project Reviewer*
(360) 972-4539
maureen.elenga@dahp.wa.gov

My work hours are 7:00am – 3:30pm, Mon-Fri

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



From: Schwertner, Margaret <mschwertner@moffattnichol.com>
Sent: Thursday, April 6, 2023 2:06 PM
To: Elenga, Maureen (DAHP) <Maureen.Elenga@dahp.wa.gov>
Cc: Wardlaw, Dennis (DAHP) <Dennis.Wardlaw@dahp.wa.gov>; Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>; John Demase <jdemase@portofilwaco.org>; maredburn@portofilwaco.org
Subject: RE: Section 106 Review for USDOT MARAD and Port of Ilwaco (POI) East Bulkhead Project

(2022-06-04226)

External Email

Hi Maureen,

Thank you for sending us the Feb 2 letter. We've revised the APE (attached) and our consultant will be completing additional field work and revising the report soon. Please let us know if you have any concerns with the attached revised APE.

Also and as requested, MARAD and the Port have not received any further Section 106 comment letters from any tribes. We did reach out again, just to provide additional time, and will keep you informed.

The project will also still need to go through SEPA, anticipated to occur within the next month or so.

If you would like to discuss further, or would like to discuss anything with our cultural resources consultant, please do not hesitate to reach out (my contact information is below within the first submittal email to DAHP).

Regards,
Margaret

From: Elenga, Maureen (DAHP) <maureen.elenga@dahp.wa.gov>

Sent: Thursday, February 2, 2023 2:46 PM

To: Schwertner, Margaret <mschwertner@moffattnichol.com>

Cc: Wardlaw, Dennis (DAHP) <dennis.wardlaw@dahp.wa.gov>

Subject: RE: Section 106 Review for USDOT MARAD and Port of Ilwaco (POI) East Bulkhead Project (2022-06-04226)

CAUTION: This email originated from outside of the organization.

Hi Margaret,

Please find the attached letter regarding the project referenced in the subject line. Feel free to reach out with any questions.

Best regards,

Maureen Elenga, M.A.
Transportation Reviewer
Dept. of Archaeology and Historic Preservation
1110 Capitol Way South, Suite 30
Olympia, WA 98501
(360) 972-4539

From: Schwertner, Margaret <mschwertner@moffattnichol.com>
Sent: Tuesday, January 31, 2023 4:36 PM
To: DAHP 106 (DAHP) <106@dahp.wa.gov>; Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>
Cc: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>; John Demase <jdemase@portofilwaco.org>; maredburn@portofilwaco.org; England, Victoria <vengland@moffattnichol.com>
Subject: Section 106 Review for USDOT MARAD and Port of Ilwaco (POI) East Bulkhead Project

External Email

Dr. Allyson Brooks,

On behalf of the U.S. Department of Transportation (DOT) Maritime Administration (MARAD), who has awarded federal funds to the Port of Ilwaco to support their East Bulkhead Resilience Project, please see the attached cover letter and report (Attachment A; completed by Willamette Cultural Resources Associates) as part of MARAD's Section 106 process.

Happy to discuss or respond to any questions. Thank you.

Regards,
Margaret

Margaret Schwertner
Senior Environmental Scientist
505 S. 336th St. | Federal Way, WA 98422
P 253.237.5928 | M 206.818.2600



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Schwertner, Margaret

From: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>
Sent: Wednesday, April 12, 2023 1:02 PM
To: Mari-Anna Redburn; Schwertner, Margaret
Cc: England, Victoria; John Demase
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

Hello Mari-Anna,

Thank you for the update. At this point, if we have not heard from the tribes, we consider their non-responses as approval for the project to move forward. If we receive any replies, we will have to consider any requests, but at this point, it is highly unlikely we will hear from any more tribes due to the length of time they have already had to comment.

Thank you,

Adam Sutherland

From: Mari-Anna Redburn <maredburn@portofilwaco.org>
Sent: Wednesday, April 12, 2023 12:36 PM
To: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>; Schwertner, Margaret <mschwertner@moffattnichol.com>
Cc: England, Victoria <vengland@moffattnichol.com>; John Demase <jdemase@portofilwaco.org>
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

We haven't received any responses from the tribes. I asked our IT vendor to give me access to John's emails, I am still waiting....

Be Well,

Mari-Anna Redburn
Finance Director / Auditor
PORT OF ILWACO
PORT OF CHINOOK
maredburn@portofilwaco.org
(360) 642-3143 phone
(360) 642-3148 fax

From: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>
Sent: Wednesday, April 12, 2023 9:33 AM
To: Schwertner, Margaret <mschwertner@moffattnichol.com>
Cc: Mari-Anna Redburn <maredburn@portofilwaco.org>; England, Victoria <vengland@moffattnichol.com>; John

Demase <jdemase@portofilwaco.org>

Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

Hello Margaret,

I know you are still working through this process with the SHPO, but I wanted to send a quick email to see if you received any replies from tribes regarding the follow-up emails you sent out. To my knowledge, MARAD has not received any responses.

Thank you,

Adam Sutherland

From: Sutherland, Adam CTR (MARAD)

Sent: Wednesday, April 5, 2023 7:49 AM

To: Schwertner, Margaret <mschwertner@moffattnichol.com>

Cc: maredburn@portofilwaco.org; England, Victoria <vengland@moffattnichol.com>; John Demase <jdemase@portofilwaco.org>

Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

Hello Margaret,

Thank you for the update and for sending all of the follow-up emails.

Thank you,

Adam Sutherland

From: Schwertner, Margaret <mschwertner@moffattnichol.com>

Sent: Tuesday, April 4, 2023 8:24 PM

To: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>

Cc: maredburn@portofilwaco.org; England, Victoria <vengland@moffattnichol.com>; John Demase <jdemase@portofilwaco.org>

Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

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Hi Adam,

Just wanted to follow up with you on Section 106.

- The Port and M&N sent out reminder emails to the 3 tribes. You have copies of all of these. We'll let you know if we receive any further comments.
- So far, we have only received comments from DAHP (you have a copy of the DAHP letter) and the Port is working to get the historic buildings/cultural resources expert back out to the site to respond to DAHP's. This revision to the APE will also be required for the state review process (SEPA).

We will keep you posted on how the above progresses over the next month or so. Please let us know if you have any questions.

Regards,

Margaret

From: Schwertner, Margaret
Sent: Wednesday, March 15, 2023 6:08 AM
To: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>; John Demase <jdemase@portofilwaco.org>
Cc: maredburn@portofilwaco.org; England, Victoria <vengland@moffattnichol.com>
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

Hi Adam,

We have a check in call today and will be discussing any received letters/emails. So far, Mari-anna has not received any, but we will be following up with John.

We will also be discussing the send out of the reminder email.

Will follow up later today.

Regards,
Margaret

From: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>
Sent: Wednesday, March 15, 2023 5:04 AM
To: John Demase <jdemase@portofilwaco.org>
Cc: Schwertner, Margaret <mschwertner@moffattnichol.com>
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

CAUTION: This email originated from outside of the organization.

Hello,

I wanted to send a quick follow-up to the below email to see if you have had a chance to send follow-up emails to the tribes and/or have heard from any of them?

Thank you,

Adam Sutherland

From: Sutherland, Adam CTR (MARAD)
Sent: Monday, March 6, 2023 8:24 AM
To: John Demase <jdemase@portofilwaco.org>
Cc: mschwertner@moffattnichol.com
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

Hello John and Margaret,

I wanted to send a quick email to see if you have received any replies from tribes regarding this project? To my knowledge, MARAD has not received anything at this point and the 30-day window for response would have ended last Friday (3/3).

For the tribes that have not responded, we ask that you send a follow-up email. If they have not replied within a week after this follow-up, we will consider their non-response as approval for the project to move forward.

Thank you,

Adam Sutherland

From: John Demase <jdemase@portofilwaco.org>

Sent: Wednesday, February 1, 2023 3:46 PM

To: dpenn@chehalistrike.org

Cc: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>; mschwertner@moffatnichol.com

Subject: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

On behalf of the US Department of Transportation Maritime Administration (MARAD), attached is a letter of invitation for you to participate in the Section 106 process for the proposed Port of Ilwaco *East Bulkhead Resilience Project*. Please let me know if you have any questions or concerns regarding this project.

John Demase
Port Manager
Port of Ilwaco
165 Howerton Way PO Box 307
Ilwaco, WA 98624
360.642.3143
360.642.3148 fax
Port of Chinook
743 Water Street P.O. Box 185
Chinook, WA 98614
360.777.8797
Cell: 360.214.0293

Final DAHP “*No Historic Properties Affected*” Letter





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

May 26, 2023

Margaret Schwertner
Moffatt & Nichol
505 S 336th Street
Federal Way, WA 98422

In future correspondence please refer to:
Project Tracking Code: 2022-06-04226
Property: Port of Ilwaco East Bulkhead Resilience Project
Re: No Historic Properties Affected

Dear Margaret Schwertner:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the Port of Ilwaco East Bulkhead Resilience Project. This action has been reviewed on behalf of the State Historic Preservation Officer (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: Addendum to the Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement Project.

First, we concur that the following properties are not eligible for listing in the National Register of Historic Places:

- Property ID: 728160 Port of Ilwaco Wharf East Bulkhead 113 Howerton Way SE, Ilwaco, Washington, 98624
- Property ID: 730624 Safe Coast Seafoods - Main Building 117 Howerton Ave, Ilwaco, Washington, 98624
- Property ID: 730625 Safe Coast Seafoods South Building 117 Howerton Ave, Ilwaco, Washington, 98624

We also concur that no historic resources 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,

Maureen Elenga, M.A.
Transportation Reviewer
(360) 972-4539
Maureen.Elenga@dahp.wa.gov



Addendum to Cultural Resources Assessment Following DAHP Letter Requesting for More Information





TECHNICAL MEMORANDUM

Addendum to Cultural Resources Assessment for the
Port of Ilwaco East Bulkhead Replacement Project –
Supplemental Historic Built Environment Documentation

Matt Goodwin, Adam Alsobrook, and Breanne Taylor

Prepared for
Moffatt & Nichol
Seattle, Washington

May 8, 2023

Moffatt and Nichol contracted with WillametteCRA to conduct a cultural resources assessment for the proposed Port of Ilwaco East Bulkhead Replacement Project, in Ilwaco, Washington (Taylor and Alsobrook 2022). After completion of the initial assessment, The United States Department of Transportation Maritime Administration (MARAD), in consultation with Washington State Department of Archaeology and Historic Preservation (DAHP) revised the project Area of Potential Effect (APE) (Figures 1 and 2). In April of 2023, Moffatt and Nichol contracted WillametteCRA to further assess the potential for previously undocumented resources within the revised project APE. The WillametteCRA field effort included supplemental field reconnaissance of the revised APE, and documentation of two previously unrecorded historic built environment (HBE) resources. This memo summarizes the results of this effort. For in-depth background information on the environmental and cultural setting of the project area, the reader is referred to the initial reconnaissance report (Taylor and Alsobrook 2022).

On April 12, 2023, WillametteCRA Archaeologist and HBE Technician Matt Goodwin conducted a supplemental reconnaissance of the expanded project APE and documented two previously unrecorded HBE resources, the Safe Coast Seafoods Processing Building and the Safe Coast Seafoods South Building (see attached Washington DAHP historic property inventory forms [HPIs]).

The Safe Coast Seafoods Processing building is an irregularly shaped and massed agglomeration of interconnected buildings with an overall footprint of approximately 27,000 square feet. Built across multiple decades (from circa 1908 to circa 1990), the earliest extant components of the building are significantly altered, and the resource is recommended as ineligible for listing in the National Register of Historic Places (NRHP) as it lacks integrity of design, materials, and workmanship. The Safe Coast Seafoods South Building is a two-story

side gable roof building with a rectangular plan that is set on a wood post and pier foundation. Background review indicates the building was constructed circa 1976 and therefore falls just shy of the minimum age threshold for listing in the NRHP. WillametteCRA has provided recommendations for NRHP eligibility in the event that project delays alter the timeline such that, by the time of implementation, the building has reached the minimum age threshold. It is recommended that the Safe Coast Seafoods South Building does not meet the requirements under any of the four NRHP eligibility criteria and is, therefore, ineligible for NRHP listing. The attached Washington DAHP HPI forms provide more detailed descriptions of the buildings and WillametteCRA's eligibility recommendations.

References

Taylor, Breanne, and Adam Alsobrook
2022 Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington. Prepared for Moffatt and Nichol, Seattle, Washington. Willamette Cultural Resources Associates, Ltd., Portland, Oregon.

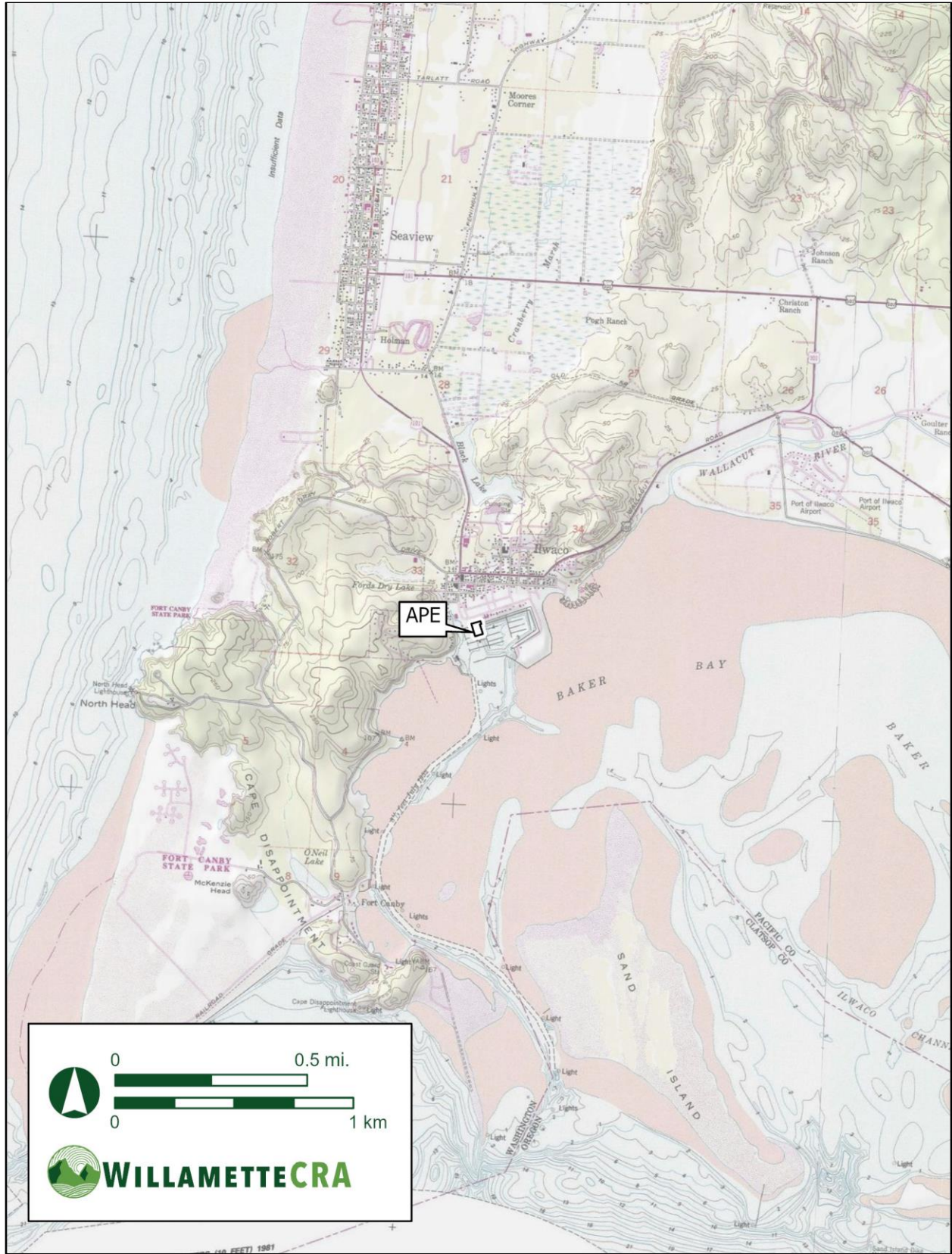


Figure 1. APE location.



Figure 2. APE shown on aerial imagery.

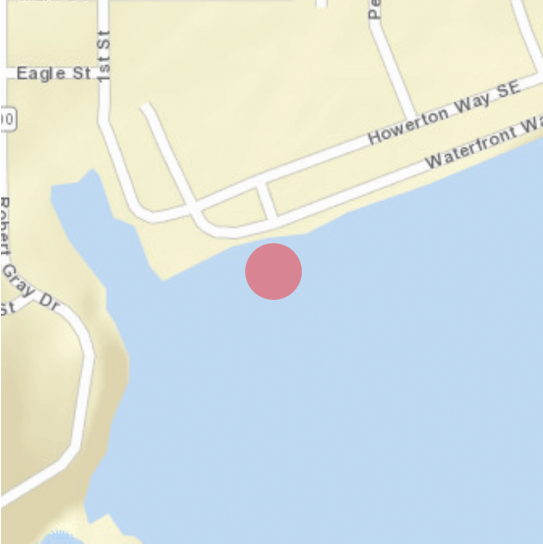
**Appendix:
HPI Forms**

Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624

Location



Address: 117 Howerton Ave, Ilwaco, Washington, 98624

Geographic Areas: Pacific County, CAPE DISAPPOINTMENT Quadrangle, T10R11W33

Information

Number of stories: 2.00

Construction Dates:

Construction Type	Year	Circa
Addition	1960	<input checked="" type="checkbox"/>
Addition	1981	<input checked="" type="checkbox"/>
Addition	1996	<input checked="" type="checkbox"/>
Built Date	1908	<input checked="" type="checkbox"/>

Historic Use:

Category	Subcategory
Industry/Processing/Extraction	Industry/Processing/Extraction - Processing Site
Industry/Processing/Extraction	Industry/Processing/Extraction - Processing Site

Historic Context:

Category
Maritime - Harvest from the Sea



Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624

Architect/Engineer:

Category	Name or Company
----------	-----------------

Thematics:

Local Registers and Districts

Name	Date Listed	Notes
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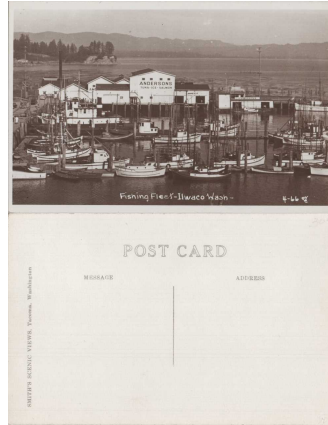
Project History

Project Number, Organization, Project Name	Resource Inventory	SHPO Determination	SHPO Determined By, Determined Date
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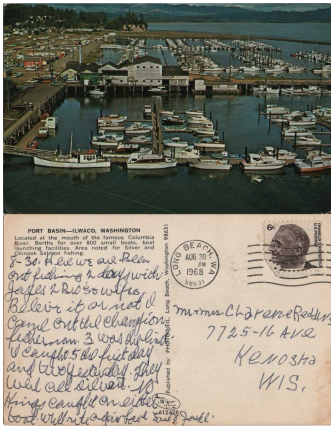
Photos



DSC00651.jpg



RPPC_Fishing Fleet Ilwaco Wash_ca 1950s.jpg



PC_Port Basin-Ilwaco Washington_1968.08.30
Postmark.jpg



DSC00692.jpg



DSC00688.jpg



DSC00672.jpg

Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624



DSC00670.jpg



DSC00668.jpg



DSC00665.jpg



DSC00663.jpg



DSC00661.jpg



DSC00648.jpg



Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624

Inventory Details - 4/11/2023

Common name: Safe Coast Seafood

Date recorded: 4/11/2023

Field Recorder: Matt Goodwin

Field Site number:

SHPO Determination

Detail Information

Characteristics:

Category	Item
Foundation	Post & Pier
Foundation	Concrete - Poured
Foundation	Concrete - Block
Form Type	Commercial
Roof Type	Varied Roof Lines
Roof Material	Metal
Roof Material	Asphalt/Composition - Shingle
Roof Material	Asphalt/Composition - Rolled
Cladding	Metal
Cladding	Wood - Vertical Boards
Cladding	Wood - T 1-11
Cladding	Fiberglass/Fiber Reinforced Plastic
Plan	Irregular

Styles:

Period	Style Details
No Style	No Style

Surveyor Opinion



Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624

Significance narrative: Minimum Age Threshold: The oldest part of the Safe Coast Seafoods processing building was constructed circa 1908 and therefore meets the minimum age threshold for listing in the National Register of Historic Places (NRHP).

Integrity: The Safe Coast Seafoods processing building is an agglomeration of interconnected buildings and additions that is typical of other seafood processing facilities in the region. The building has been modified and expanded over a span of 80 years and has undergone extensive changes to plan and fenestration. The building maintains integrity of location, setting, feeling, and association, but it has severely diminished integrity of design, materials, and workmanship.

Criterion A: The Safe Coast Seafoods processing building is potentially eligible under NRHP Criterion A for its potential associations with the history of the development of the Port of Ilwaco and of the development of the local commercial fishing industry between 1930 and 1972. However, based on the substantial amount of integrity loss, the building does not possess sufficient integrity to convey any potential historical significance under Criterion A.

Criterion B: Research did not reveal any historically significant individuals associated with the Safe Coast Seafoods processing building. Therefore, it is recommended that the building is not eligible for listing in the NRHP under Criterion B.

Criterion C: The Safe Coast Seafoods processing building is an indistinct example of a maritime fishing processing building that is not the work of a master engineer, is not a significant or distinguished entity representative of its type, and which does not possess high artistic values. Therefore, it is recommended that the building is not eligible for listing in the NRHP under Criterion C.

Criterion D: The Safe Coast Seafoods processing building is unlikely to yield information important in history or prehistory. Therefore, it is recommended that the Safe Coast Seafoods Building is not eligible for listing in the NRHP under Criterion D.

Summary: It is recommended that the Safe Coast Seafoods is not eligible for listing in the NRHP.

Physical description: Lewis Alfred Loomis, an early European American settler of the Long Beach peninsula, was instrumental in developing the earliest vessel docking facilities at Ilwaco. Lewis and his brother Edwin raised sheep on their land claim, which was located in the vicinity of present-day Lake Loomis State Park. To address his need for a wharf to handle his outgoing wool, Lewis Alfred Loomis incorporated the Ilwaco Wharf Company in July 1874 (The Oregonian 1913; Williams 1924:55). In 1881, the 450-foot-long wharf was lengthened to 600 feet to reach deeper water farther from shore. The wharf was also widened by ten feet (The Morning Astorian 1881a, 1881b). By 1901, U.S. Coast and Geodetic Survey maps show the formal plat of Ilwaco (USC&GS 1901). At this time, the original shoreline was still more than a hundred meters north of the boundary of the current study area, and two piers had been built out into Baker Bay within the project bounds. The pier along the west boundary of the current study area was the Ilwaco Wharf Company's pier of 1874-1881, which connected the IR&NC line from the Long Beach Peninsula to a landing approximately 2500 feet into the Bay. In the late 19th and early 20th centuries, silt buildup in Baker Bay emerged as a threat to the viability of Ilwaco as a port for deep draft vessels (Ott 2010). In 1889, mariners and river pilots noted that Sand Island had shifted to the north by about two miles since about 1869. The



Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624

movement of Sand Island caused Baker Bay to fill with silt, and the pilots grew concerned that Ilwaco would soon be inaccessible by ship (North Pacific History Company 1889:103). By 1929, the section of the IR&NC pier between the Ilwaco Mill & Lumber Company and the former IR&NC freight dock and car barn on a platform over Baker Bay had been removed (Sanborn 1909, 1929). By that same year, the pier east of the IR&NC pier had become home to the Pioneer Packing Company Clam & Fish Cannery (Sanborn 1909, 1929). The pier was about 20 feet wide and originated at a point approximately 250 feet east of the present-day intersection of Eagle Street SW and First Avenue S and extended approximately 600 feet out to the platform that supported the cannery buildings. This platform measured approximately 100 feet by 250 feet, with the long axis of the platform roughly aligned in a south-southeast/north-northwest direction. The east pier extended approximately 500 to 600 feet beyond the Pioneer Packing Company platform and then turned ninety degrees westward and connected with the platform supporting the J.P. McGowan & Sons Fish Cannery. Overall, the east pier extended approximately 1400 feet into Baker Bay (Sanborn 1929). The original shoreline was still present in 1950 and marked on a Metsker Atlas of Pacific County as, "First Rate Tidelands" (Metsker Maps 1950). At this time, the shoreline was located north of the project area, just south of Lake Street SE and Main Street SE. Dredge spoils were placed at the waterfront edge, thus beginning the infill of lots along present-day Howerton Avenue and Waterfront Way (Ott 2010). The new 500-boat mooring basin was dedicated in 1959 (The Oregonian 1959). The 1959 nautical chart for Baker Bay shows the breakwater and approximate areas covered by dredge spoils to the north of the mooring basin (USGS 1956). In March 1965, the United States Army Corps of Engineers announced plans to construct a new breakwater across the Holman waterway west and south of the mooring basin. Plans included cutting off the existing pier (formerly the home of the Pioneer Packing Company cannery) to accommodate the new breakwater, which would also create moorage space for additional boats (The Oregonian 1965). By 1968, the filling in of the former tidelands made the former Pioneer Packing Company cannery platform into a peninsula at the northwest corner of the mooring basin (USC&GS 1968; USGS 1969). The former Pioneer Packing Company cannery was operated as Anderson's (as depicted in the attached postcard) and became Jessie's Ilwaco Fish Company in 1961. The property is now home to Safe Coast Seafoods. The original footprint of the platform supporting the Pioneer Packing Company building was approximately 100 feet by 250 feet in size, with the long axis of the platform roughly aligned in a south-southeast/north-northwest direction. A 1956 aerial photograph shows the original narrower platform, which was expanded to the east by 1968 to create a vehicular driveway (USC&GS 1968; USGS 1956, 1969). By 1974, the overall configuration of the current Safe Coast Seafoods facility was largely complete and similar to the conditions found today (USGS 1974).

The Safe Coast Seafoods facility, in its current iteration, is an irregularly shaped and massed building that measures approximately 210 ft. (n-s) by 155 ft. (e-w) with an overall footprint of approximately 27,000 square feet.

The building's east façade is comprised of four interconnected components. From north to south the north façade includes: a single story cross-gable rectangular plan component, a single story rectangular plan shed roof component, a single story gable roof square plan component, and a two-story gable roof square plan component. A large, elevated refrigeration unit is positioned in front of the central shed roof building component. All building components on the east façade are clad metal sheet siding. The southernmost two-story is clad in ribbed metal sheet siding, while the other three are clad in corrugated metal sheets. Roofing on the east façade is a combination of rolled asphalt/composition and asphalt/composition shingles.

The south façade is comprised of four interconnected building components, including the



Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624

aforementioned two-story gable roof square plan component from the east façade. Additional components include square plan shed roof component, a cross gable L-shaped plan component, and a front gable rectangular plan component. The easternmost two-story component is clad in ribbed metal sheet siding, while the other three are clad in corrugated metal sheets. Roofing on the south façade is a combination of rolled asphalt/composition and asphalt/composition shingles.

The Safe Coast Seafood building's west façade is comprised of six interconnected components and is approximately 210 feet in length, making it the longest of the building's facades. From south to north the west façade includes: a single-story front gable roof rectangular plan component, a two-story rectangular plan side gable roof component, and a series of four, interconnected but offset, single story gable roof rectangular plan components. The three easternmost building components on the west façade are clad in corrugated metal sheets and feature rolled asphalt/composite roofing. The fourth building component (from south) is clad entirely in ribbed metal sheets and appears to be a prefab structure. The fifth component from south is clad in corrugated plastic sheets with asphalt/composition shingle roofing, and the sixth (northernmost) component is clad entirely in ribbed metal sheets.

The north façade is comprised of four interconnected components, including the cross gable roof single story component mentioned in the description of the east façade, and the single story gable roof corrugated plastic-clad component mentioned in the description of the west façade. Additional components include square plan shed roof component (second from west), and a side gable rectangular plan component (third from west). As mentioned above, the westernmost building component is clad in corrugated plastic sheet siding, while the other three are clad in corrugated metal sheets. Roofing on the north façade is a combination of rolled asphalt/composition and asphalt/composition shingles.

Review of historic period and modern photographs and aerial images indicate extensive modifications and additions to the Safe Coast Seafoods building during the modern period. Notable changes include: 1.) the addition of the two northmost components on the west façade – circa 1975; 2. removal/replacement of 2 gable roof 1 ½ story components on the east façade circa 1985; and 3). the addition of the two-story ribbed metal clad component at the southeast corner of the building and addition of the large, elevated refrigeration unit on the east façade - circa 1990 (Historic Postcards 1968, 1970, NETR 2023). Additionally, significant changes to the fenestration pattern of the building are indicated through field observations and review historic/modern photographs and aerials. First and second story window openings (4 on each floor) on the west elevation of the two-story component on the west façade have been covered over. Two of three large bay openings on the southernmost building of the west façade have also been covered over, along with window and bay openings on the third component from south on the west façade (Historic Postcards 1968, 1970). Evidence of changes to fenestration on extent historic-period components on the north, south, and east facades was also noted during the field visit.

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Historic Property Report

Historic Name: Safe Coast Seafoods - Main Building

Property ID: 730624

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Historic Property Report

Historic Name: Safe Coast Seafoods South Building

Property ID: 730625

Location



Address: 117 Howerton Ave, Ilwaco, Washington, 98624

Geographic Areas: T10R11W33, CAPE DISAPPOINTMENT Quadrangle, Pacific County

Information

Number of stories: 2.00

Construction Dates:

Construction Type	Year	Circa
Built Date	1976	<input checked="" type="checkbox"/>

Historic Use:

Category	Subcategory
Agriculture/Subsistence	Agriculture/Subsistence - Processing
Agriculture/Subsistence	Agriculture/Subsistence - Processing

Historic Context:

Category

Maritime - Harvest from the Sea

Architect/Engineer:

Category	Name or Company
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Historic Property Report

Historic Name: Safe Coast Seafoods South Building

Property ID: 730625

Thematics:

Local Registers and Districts

Name	Date Listed	Notes
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Project History

Project Number, Organization, Project Name	Resource Inventory	SHPO Determination	SHPO Determined By, Determined Date
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Photos



DSC00656.jpg



DSC00680.jpg



DSC00679.jpg



DSC00678.jpg



DSC00677.jpg



DSC00676.jpg

Historic Property Report

Historic Name: Safe Coast Seafoods South Building

Property ID: 730625



DSC00675.jpg



DSC00655.jpg



DSC00652.jpg



Historic Property Report

Historic Name: Safe Coast Seafoods South Building

Property ID: 730625

Inventory Details - 4/11/2023

Common name:

Date recorded: 4/11/2023

Field Recorder: Christina (Kanani) Paraso (Panzarino)

Field Site number:

SHPO Determination

Detail Information

Characteristics:

Category	Item
Foundation	Concrete - Poured
Form Type	Commercial
Roof Type	Gable - Side
Roof Material	Asphalt/Composition - Shingle
Cladding	Metal
Plan	Rectangle

Surveyor Opinion



Historic Property Report

Historic Name: Safe Coast Seafoods South Building

Property ID: 730625

Significance narrative:

Minimum Age Threshold: The Safe Coast Seafoods South building was constructed circa 1976 and therefore falls just shy of the minimum age threshold for listing in the National Register of Historic Places (NRHP). WillametteCRA has evaluated the building for NRHP eligibility in the event that project delays alter the timeline such that, by the time of implementation, the building has reached the minimum age threshold.

Integrity: The Safe Coast Seafoods South Building has undergone changes to cladding and fenestration. The building maintains integrity of location, setting, feeling, and association, but it has diminished integrity of design, materials, and workmanship.

Criterion A: The Safe Coast Seafoods South Building is potentially eligible under NRHP Criterion A for its potential associations with the history of the development of the Port of Ilwaco and of the development of the local commercial fishing industry between 1930 and the mid-1970s. However, based on the substantial amount of integrity loss, the building does not possess sufficient integrity to convey any potential historical significance under Criterion A.

Criterion B: Research did not reveal any historically significant individuals associated with the Safe Coast Seafoods South Building. Therefore, it is recommended that the building is not eligible for listing in the NRHP under Criterion B.

Criterion C: The Safe Coast Seafoods South Building is an indistinct example of a maritime fishing processing/administrative building that is not the work of a master engineer, is not a significant or distinguished entity representative of its type, and which does not possess high artistic values. Therefore, it is recommended that the building is not eligible for listing in the NRHP under Criterion C.

Criterion D: The Safe Coast Seafoods South Building is unlikely to yield information important in history or prehistory. Therefore, it is recommended that the Safe Coast Seafoods South Building is not eligible for listing in the NRHP under Criterion D.

Summary: It is recommended that the Safe Coast Seafoods South Building is not eligible for listing in the NRHP.

Physical description:

Early Development of the Port of Ilwaco and the Mooring Basin

Lewis Alfred Loomis, an early European American settler of the Long Beach peninsula, was instrumental in developing the earliest vessel docking facilities at Ilwaco. Lewis and his brother Edwin raised sheep on their land claim, which was located in the vicinity of present-day Lake Loomis State Park. To address his need for a wharf to handle his outgoing wool, Lewis Alfred Loomis incorporated the Ilwaco Wharf Company in July 1874 (The Oregonian 1913; Williams 1924:55). In 1881, the 450-foot-long wharf was lengthened to 600 feet to reach deeper water farther from shore. The wharf was also widened by ten feet (The Morning Astorian 1881a, 1881b). By 1901, U.S. Coast and Geodetic Survey maps show the formal plat of Ilwaco (USC&GS 1901). At this time, the original shoreline was still more than a hundred meters north of the boundary of the current study area, and two piers had been built out into Baker Bay within the project bounds. The pier along the west boundary of the current study area was the Ilwaco Wharf Company’s pier of 1874-1881, which connected the IR&NC line from the Long Beach Peninsula to a landing approximately 2500 feet into the Bay. In the late 19th and early 20th centuries, silt buildup in Baker Bay emerged as a threat to the viability of Ilwaco as a port for deep draft vessels (Ott 2010). In 1889, mariners and river pilots noted that Sand Island had shifted to the north by about two miles since about 1869. The movement of Sand Island caused Baker Bay to fill with silt, and the pilots grew concerned that Ilwaco would soon be inaccessible by ship (North Pacific History Company 1889:103). By 1929, the section of the IR&NC pier between the Ilwaco Mill & Lumber Company and the former IR&NC freight dock and car barn on a platform over Baker Bay had been removed (Sanborn 1909, 1929). By that same year, the pier east of the IR&NC pier had become home to the Pioneer Packing Company Clam & Fish Cannery (Sanborn 1909, 1929). The pier was about 20 feet wide and originated at a point approximately 250 feet east of the present-day intersection of Eagle Street SW and First Avenue S and



Historic Property Report

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extended approximately 600 feet out to the platform that supported the cannery buildings. This platform measured approximately 100 feet by 250 feet, with the long axis of the platform roughly aligned in a south-southeast/north-northwest direction. The east pier extended approximately 500 to 600 feet beyond the Pioneer Packing Company platform and then turned ninety degrees westward and connected with the platform supporting the J.P. McGowan & Sons Fish Cannery. Overall, the east pier extended approximately 1400 feet into Baker Bay (Sanborn 1929). The original shoreline was still present in 1950 and marked on a Metsker Atlas of Pacific County as, "First Rate Tidelands" (Metsker Maps 1950). At this time, the shoreline was located north of the project area, just south of Lake Street SE and Main Street SE. Dredge spoils were placed at the waterfront edge, thus beginning the infill of lots along present-day Howerton Avenue and Waterfront Way (Ott 2010). The new 500-boat mooring basin was dedicated in 1959 (The Oregonian 1959). The 1959 nautical chart for Baker Bay shows the breakwater and approximate areas covered by dredge spoils to the north of the mooring basin (USGS 1956). In March 1965, the United States Army Corps of Engineers announced plans to construct a new breakwater across the Holman waterway west and south of the mooring basin. Plans included cutting off the existing pier (formerly the home of the Pioneer Packing Company cannery) to accommodate the new breakwater, which would also create moorage space for additional boats (The Oregonian 1965). By 1968, the filling in of the former tidelands made the former Pioneer Packing Company cannery platform into a peninsula at the northwest corner of the mooring basin (USC&GS 1968; USGS 1969). The former Pioneer Packing Company cannery was operated as Anderson's (as depicted in the attached postcard) and became Jessie's Ilwaco Fish Company in 1961. The property is now home to Safe Coast Seafoods. The original footprint of the platform supporting the Pioneer Packing Company building was approximately 100 feet by 250 feet in size, with the long axis of the platform roughly aligned in a south-southeast/north-northwest direction. A 1956 aerial photograph shows the original narrower platform, which was expanded to the east by 1968 to create a vehicular driveway (USC&GS 1968; USGS 1956, 1969). Review of aerial photography from the 1960s-1980s indicates the Safe Coast Seafoods South Building was constructed sometime between 1976 and 1981 (NETR 2023).

The Safe Coast Seafoods South Building, is a two-story side gable roof building with a rectangular plan. The building is set on a wood post and pier foundation and measures approximately 35 ft. (n-s) by 40 ft. (e-w). The roof is clad in asphalt/composite shingles and the building is clad entirely in ribbed metal sheets.

The second story, on the south façade, projects outward from the first story approximately 3 feet and is supported by a wooden crossmember and seven wood posts. The south façade first story features a set of four window openings, with aluminum slider windows, positioned along the western 2/3 of the building. The second floor has two window openings with aluminum sliders set in shallow bay projections, positioned at the east and west ends of the building.

The second story of the east façade projects slightly from the first story (approximately 10 inches) and features a single window opening with a vinyl double slider window. The first story of the east façade features 3 window openings with aluminum slider windows. The main entrance is metal half-light door at the northwest corner on the north façade that is protected by a cantilevered second story corner overhang. Two window openings are evident on the first floor of the north façade, one filled with an fixed, octagonal wood window and one that is covered over with ribbed metal sheeting. The second story has two window openings, one is vinyl slider set in a shallow bay projection at the northwest corner, and the other a smaller fixed octagonal wood frame window centered along the north façade.

As mentioned above, the west façade second story projects approximately 3 feet



Historic Property Report

Historic Name: Safe Coast Seafoods South Building

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outward from the first story on the north and south ends. The second story also projects slightly (about 4 inches) along the main body of the west façade. The second story has two window openings with aluminum sliders set in shallow bay projections. The first story has 3 window openings, two with metal sliders and one with a fixed vinyl window. Rectangular louvered vents are placed just below the apex of the gable on both the west and east facades.

Letter and Original Cultural Resources Assessment to DAHP





February 2, 2023

Margaret Schwertner
Moffatt & Nichol
505 S 336th Street
Federal Way, WA 98422

In future correspondence please refer to:

Project Tracking Code: 2022-06-04226

Property: Port of Ilwaco

Re: More Information Needed – East Bulkhead Project

Dear Margaret Schwertner:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. In response, we have reviewed the materials you provided for this project. In order to complete our review, we request the following information be provided to our office:

- DAHP does not concur with the Area of Potential Effects (APE) as defined in your consultation letter. Given that the pier is the structure being stabilized by the East Bulkhead Project, the entire pier and any historic properties occupying the pier are within the APE. Please expand the APE to include the entire pier around which the bulkhead is constructed.
- DAHP does not agree with the rationale provided for omitting the inventory and evaluation of the Safe Coast Seafoods building complex. This complex is over 50-years in age and therefore should be inventoried per DAHP survey guidelines. Please complete and submit a Historic Property Inventory Form (HPI) for the Safe Coast Seafoods complex at 117 Howerton Ave SE, Ilwaco, WA 98624 to be reviewed by DAHP for determination of eligibility for listing in the National Register of Historic Places. Please be sure to append the HPI to the survey report and edit discussion of this property therein accordingly.

DAHP strongly encourages consultation with our office be initiated with the submission of a proposed APE and proposed methodology for cultural resources evaluation for review and concurrence by DAHP prior to the submission of cultural resources reports and requests for concurrence on determination of effects.

We appreciate receiving copies of any correspondence or comments from concerned tribes and 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 pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

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 blue ink, appearing to read 'ME', with a long horizontal line extending to the right.

Maureen Elenga, M.A.
Transportation Reviewer
(360) 972-4539
Maureen.Elenga@dahp.wa.gov





U.S. Department
Of Transportation
**Maritime
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 26, 2023

VIA ELECTRONIC MAIL: 106@dahp.wa.gov

Dr. Allyson Brooks
State Historic Preservation Officer
Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Subject: U.S. Department of Transportation Maritime Administration, Section 106 Initiation,
Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Resilience Project,
Port of Ilwaco, Pacific County, Washington

Dear Ms. Brooks:

The U.S. Department of Transportation (DOT) Maritime Administration (MARAD) awarded funds to the Port of Ilwaco (Port) under MARAD's Fiscal Year 2021 Port Infrastructure Development Program (PIDP) for the Port of Ilwaco East Bulkhead Resilience Project (project). The project is located in Pacific County, Washington (Figure 1). The Project vicinity consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard.

This action constitutes an undertaking under Section 106 of the National Historic Preservation Act 1966, as amended (54 U.S.C. § 300101 et seq.). Pursuant to Section 106 and its implementing regulations, 36 CFR § 800, MARAD is initiating consultation with your office regarding this project.

Project Description

The proposed project involves replacement of the existing east bulkhead located at a commercial fishing wharf (wharf). The eastern side of the wharf is an earth filled structure protected by a creosote-treated timber bulkhead (to be replaced). The Port's marina is located waterward of the existing bulkhead; to the north the shoreline is protected by a low timber retaining wall and large log. To the south of the wall, shoreline protection consists of riprap and concrete rubble.

The project will serve the following purposes and provide the following benefits:

- The replacement bulkhead will serve as the initial phase to increase the facility's climate change/sea level rise resiliency and will help protect wharf facilities from flooding. The bulkhead will be designed to accommodate the planned facility ground floor elevation increase in the future.
- The top of the embankment elevation to the north of the bulkhead will be raised to approximately +14 feet (mean lower low water) MLLW and the existing creosote-treated retaining wall will be replaced with riprap to improve shoreline protection. The increase to top of bank elevation will mitigate sea level rise impacts between the bulkhead and the marina access pier to the east.
- Re-grading and re-paving of the upland area behind the bulkhead wall will facilitate positive drainage away from the Safe Coast Seafoods buildings and help protect the facilities during flood events.

- The bulkhead replacement will prevent the shoreline from failing and falling into a portion of the active marina, which would adversely impact operations.
- The replacement bulkhead will be designed to accommodate the temporary mooring of fishing vessels which will allow vessels to unload/load equipment and product and improve efficiencies at the Safe Coast Seafoods facility. Under existing conditions, the timber bulkhead is used for temporary mooring but cannot be used for loading/unloading of vessels due to its poor, unstable condition.
- The project will allow trucks to drive safely on the bulkhead-supported dockside area again, which will improve the efficiency of cargo transfer operations and improve the port's competitiveness. The adjacent roadway has been closed to vehicle access due to the poor condition of the existing bulkhead.
- The removal of creosote-treated wood from the marine environment will provide water quality benefits.

Area of Potential Effects

In 2022, Willamette Cultural Resources Associates, LTD (WillametteCRA) completed a Cultural Resources Assessment for Port of Ilwaco. The final report titled *Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington*, dated October 2022, is attached (Attachment A). It is important to note that the report makes reference to other independent actions that are being proposed for the marina (maintenance dredging) that are not funded by MARAD.

WillametteCRA determined the Area of Potential Effects (APE) for the East Bulkhead Resilience Project by reviewing the potential for project activities to affect any historic properties. This included a review of records on file with Oregon State Historic Preservation Office (SHPO) and Washington DAHP; historic map and archival research; and field investigations. A walk-over was conducted across the margins of the marina with attention paid to areas of exposed earth. The APE was defined as the boundary of the East Bulkhead Resilience Project (Figure 2). No archaeological resources were identified within the APE.

Identification of Historic Properties

The nearest previously identified archaeological resource is a reported precontact village and burial site, 45PC1, which was recorded in 1948 and is consistent with the ethnohistoric accounts of *wiittcutk*, a seasonal Chinookan village. This site is located upland, approximately 0.2 miles from the APE.

During the cultural resources assessment of the study area, WillametteCRA's architectural historian documented the East Bulkhead and completed an Historic Property Inventory (HPI) form for the Washington DAHP. The bulkhead was constructed circa 1959 to 1968. The creosote-treated timber pile, lagging, and waler construction is typical of other marine bulkheads in the region. The bulkhead is severely deteriorated overall, and a large portion of the structure has failed and shifted out of plumb. It is the opinion of WillametteCRA that the East Bulkhead does not meet the criteria for National Register of Historic Places (NRHP) eligibility as the structure does not maintain sufficient integrity to convey its historical significance. Although there are structures more than 50 years old in the viewshed of the proposed East Bulkhead replacement project, it is the professional opinion of WillametteCRA that the project as currently defined will not create significant visual impacts.

The Safe Coast Seafoods building complex does not appear to meet the criteria for NRHP eligibility as it does not appear to maintain sufficient integrity to convey its historical significance. The group of commercial buildings and structures to the northeast of the East Bulkhead were not evaluated for NRHP eligibility due to the reasons identified above.

Assessment of Effects

No archaeological resources were identified within the APE and the nearest resource will not be affected by the Project. Further, there are no NRHP-eligible historic properties within the APE or adjacent to the APE that will be affected by the Project. Additional detail about the Assessment of Effects can be found in the attached report (WillametteCRA 2022). Therefore, MARAD offers the finding of No Historic Properties Affected.

Pursuant to 36 CFR 800.4(d)(1), MARAD seeks concurrence by your office with this finding.

Please note that for the purposes of this project, MARAD has authorized Margaret Schwertner of Moffatt & Nichol (Seattle, Washington office; phone 253-237-5928) to consult with your Agency on behalf of MARAD. We therefore request that you provide a copy of your response to them.

I am working remotely and ask that all communication be sent electronically. If you have additional questions or comments, please contact me and/or the consultant for the action proponent, Margaret Schwertner, at mschwertner@moffattnichol.com.

Sincerely,

Barbara Voulgaris

Barbara Voulgaris
Federal Preservation Officer
Barbara.Voulgaris@dot.gov
202.366.0866

Attachment A – Cultural Resources Assessment for Port of Ilwaco, “Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington”, dated October 2022

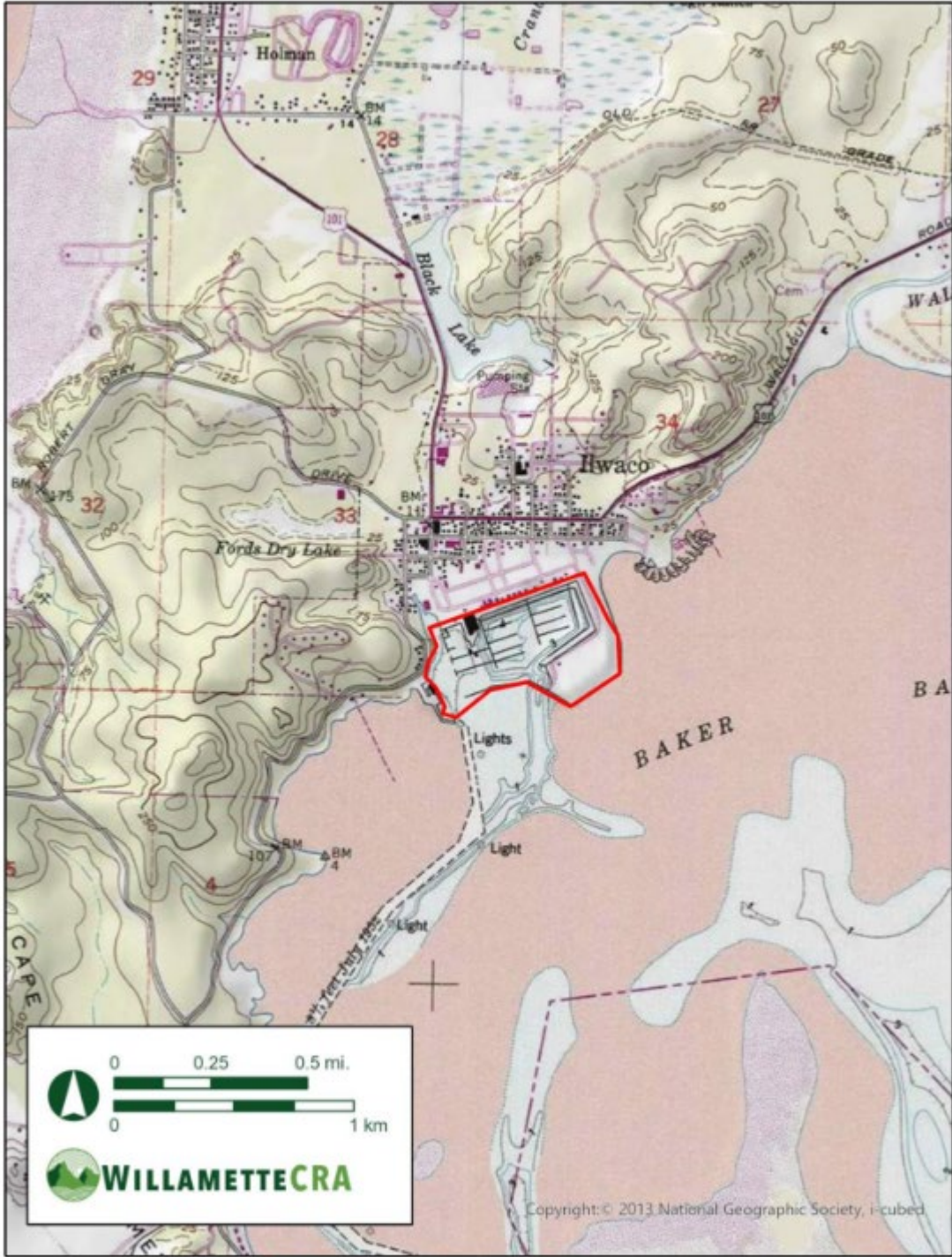


Figure 1 – Project Location (WillametteCRA 2022)



Figure 2 – Project Area of Potential Effect (WillametteCRA 2022)

CULTURAL RESOURCES REPORT COVER SHEET

DAHP Project Number: _____ (Please contact the lead agency for the project number. If associated to SEPA, please contact SEPA@dahp.wa.gov to obtain the project number before creating a new project.)

Author: Breanne Taylor and Adam Alsobrook

Title of Report: Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington

Date of Report: October 3, 2022

County(ies): Pacific Section: 33,34 Township: 10N Range: 11W
Quad: Cape Disappointment, WA 7.5-minute Acres: 18

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 #:

- Submission of PDFs is required.
- Please be sure that any PDF submitted to DAHP has its cover sheet, figures, graphics, appendices, attachments, correspondence, etc., compiled into one single PDF file.
- Please check that the PDF displays correctly when opened.



WILLAMETTE
CULTURAL RESOURCES ASSOCIATES, LTD.



Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington

**Cultural Resources Assessment for the
Port of Ilwaco East Bulkhead
Replacement and Dredging Projects,
Pacific County, Washington**

Prepared by
Breanne Taylor, M.A., RPA
Adam Alsobrook, B.S.

October 3, 2022

WillametteCRA Report No. 21-130a
Portland, Oregon

Prepared for
Moffatt and Nichol
Seattle, Washington



WILLAMETTE
CULTURAL RESOURCES ASSOCIATES, LTD.

Report Details

Project Name:	Port of Ilwaco East Bulkhead Replacement and Dredging Projects
Agency:	USDOT Maritime Administration (Port of Ilwaco Infrastructure Project, only)
Client:	Moffatt and Nichol for Port of Ilwaco
Regulatory Framework:	Section 106, USACE Section 104
County(ies):	Pacific
Legal Description:	Township 10N, Range 11W, Sections 33 and 34
USGS Quad(s):	<i>Cape Disappointment, WA 7.5-minute</i>
Project Acreage:	147
Survey Acreage:	18
Curation Location:	N/A
Field Note Location:	WillametteCRA, Portland Office
Fieldwork Type:	Field Reconnaissance
Fieldwork Dates:	April 27 and June 10, 2022
Field Personnel:	Breanne Taylor and Adam Alsobrook
Findings:	None
Recommendations:	Inadvertent Discovery Plan be in place for construction.

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Introduction

Moffatt and Nichol contracted with Willamette Cultural Resources Associates, Ltd. (WillametteCRA) to conduct a cultural resources assessment of the proposed Port of Ilwaco (POI) bulkhead replacement and dredging projects in Pacific County, Washington (Figures 1 through 3). The proposed projects are in Township 10 North, Range 11 West, Sections 33 and 34, just northeast of Cape Disappointment along Baker Bay. The East Bulkhead replacement and Ilwaco Marina dredging are separate and independent projects. The bulkhead replacement and associated maintenance and repairs along the shoreline will be conducted with United States Department of Transportation Maritime Administration (MARAD) grant funding. The Ilwaco Marina dredging project will be permitted separately. MARAD is acting as the lead federal agency responsible for National Historic Preservation Act (NHPA) Section 106 compliance for the MARAD funded bulkhead project. The projects are also subject to the requirements of a US Army Corps (USACE) Section 404 permit. USACE is acting as the lead federal agency for the dredging project.

East Bulkhead Replacement Project

The proposed East Bulkhead project consists of the replacement of the East Bulkhead, re-grading the Safe Coast Seafoods truck lane, shoreline protection, and slope stabilization (see Figure 3, 4, and 5). The East Bulkhead was originally built with timber-pile and earthen fill. The failing bulkhead will be replaced with a sheet-pile, either steel sheet or composite material and anchor system designed to withstand sea-level rise. An associated fender and mooring network will be constructed at the bulkhead to facilitate the temporary mooring of fishing boats and other vessels. The shoreline between the East Bulkhead and West Pier will be raised approximately 2–3 feet (ft.) in the process, increasing the elevation of part of the Ilwaco Marina shoreline.

Ilwaco Marina Maintenance Dredging and Beneficial Use Project

The proposed Ilwaco Marina dredging and beneficial use project will consist of dredging and dredge placement at proposed in-water beneficial use sites in Baker Bay (see Figure 2). The project will address dredging and disposal issues at the POI Marina. Large amounts of dredge material has accumulated at the previously designated upland placement areas and those areas are nearing capacity. The project will attempt to restore the design depth of the marina.

No formal project area or area of potential effect (APE) has been established for the projects at this time. The current study area encompasses an area delineated by WillametteCRA for our background research and reconnaissance level field investigation. The study area consists of the Ilwaco Marina and the East Bulkhead where Safe Coast Seafoods is currently located. Additionally, the study area includes the existing upland dredge placement area at the southeast edge of the POI property. The dredge placement area is an approximately 8 meter (m) high berm of deposited dredge material (see Figures 2 and 3).

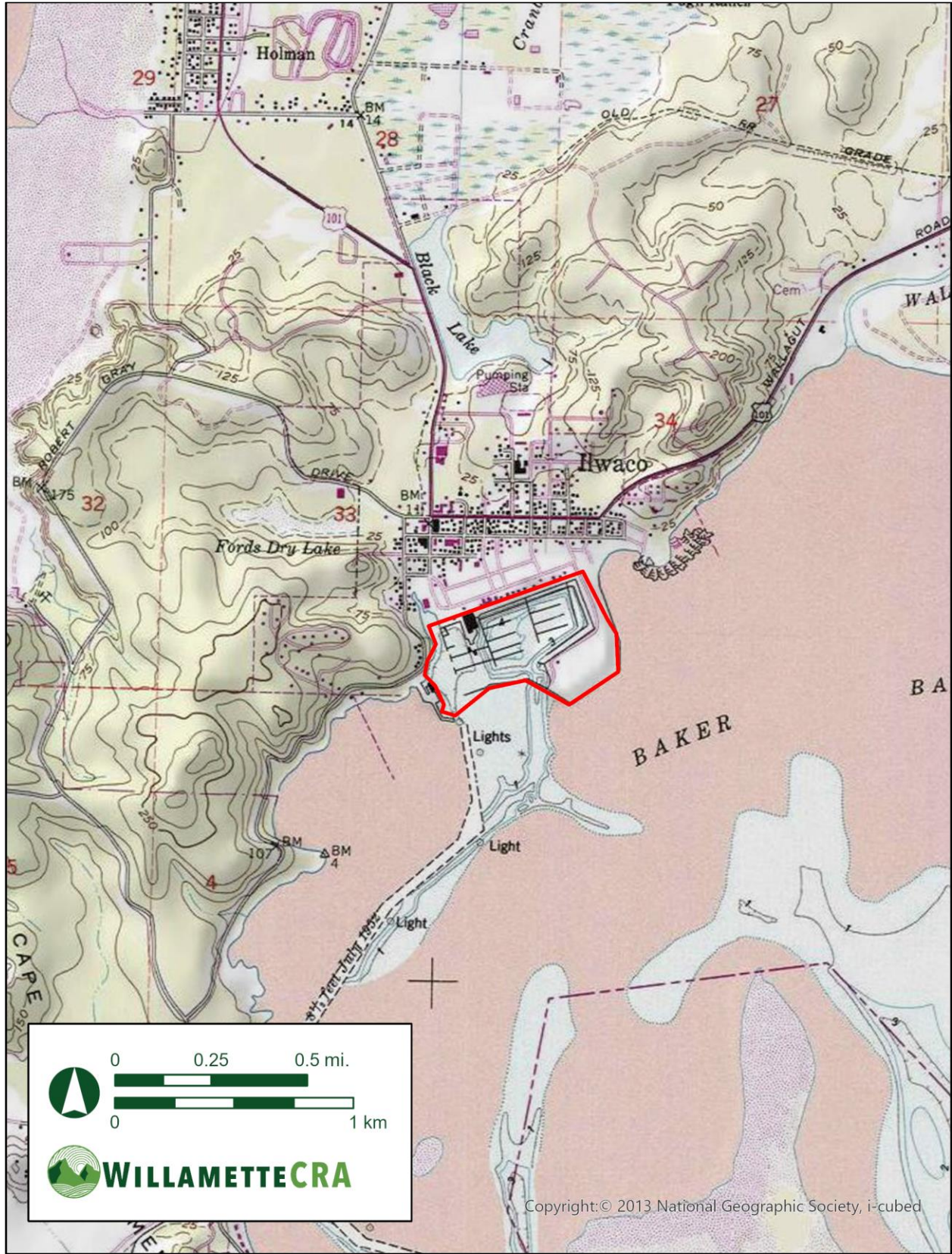


Figure 1. Project location map.

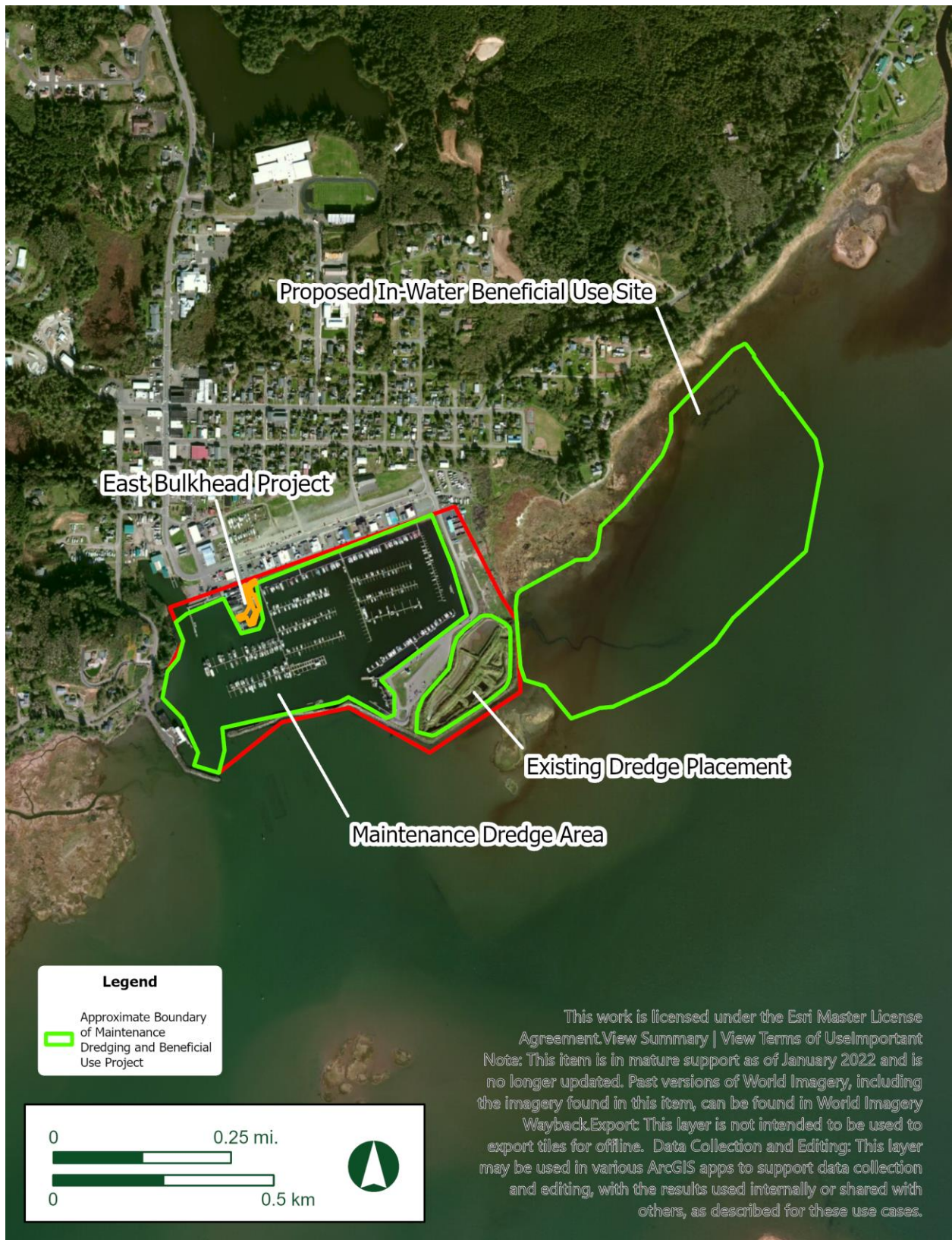


Figure 2. Modern aerial depicting the study area (in red) and proposed East Bulkhead replacement and maintenance dredging and beneficial use projects.

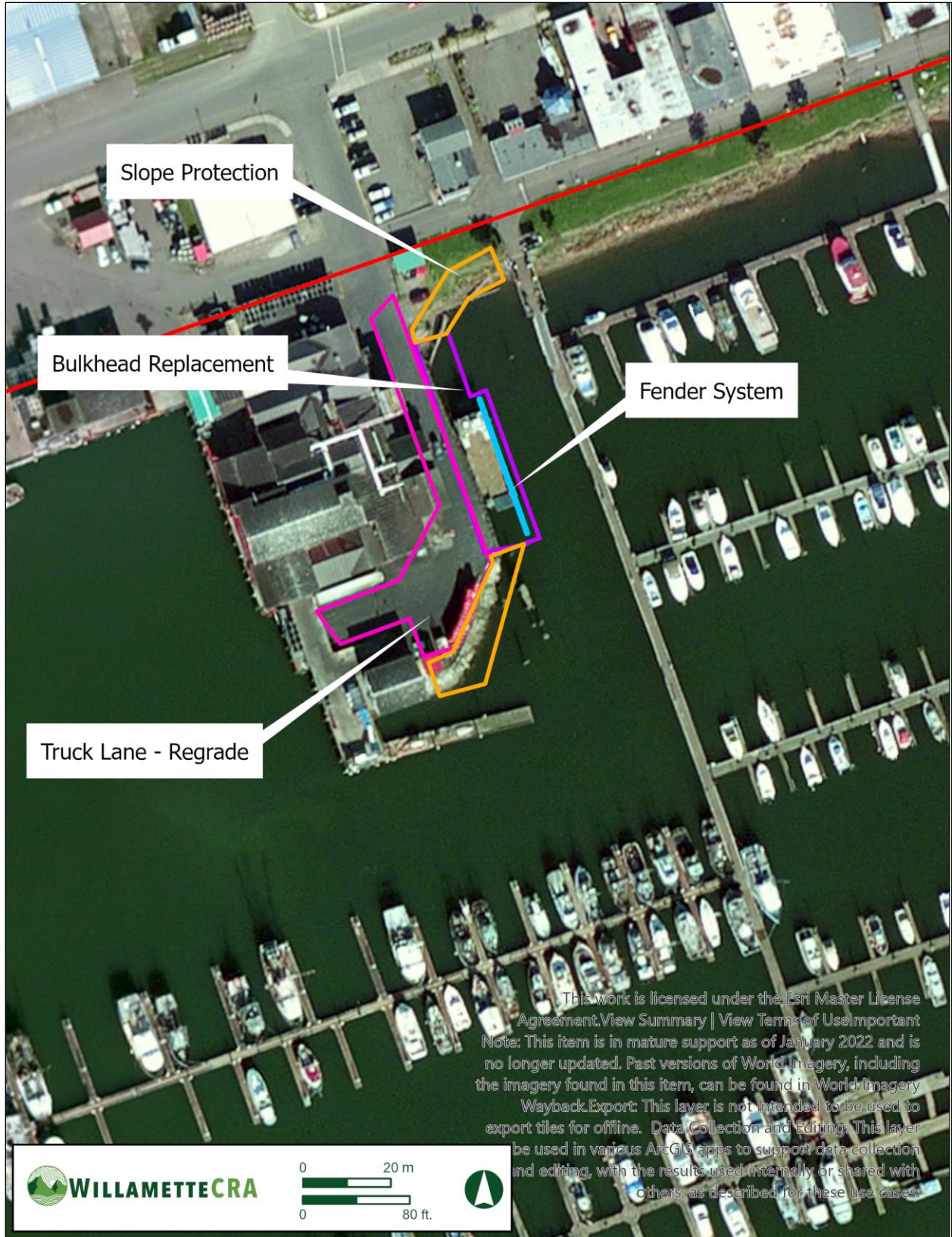


Figure 3. Overview showing proposed East Bulkhead and marine structure replacement elements.



Figure 4. Overview of the East Bulkhead and Safe Coast Seafoods building with visible buckling of the bulkhead and asphalt. View is southwest.

WillametteCRA reviewed documents on file with the Washington Department of Archaeology and Historic Preservation (DAHP) and the Oregon State Historic Preservation Office (SHPO) to determine if archaeological resources have been recorded in the project vicinity, and to identify any previous archaeological studies in the area. WillametteCRA staff also examined copies of historical maps and records to assess the potential for historic-period archaeological resources in the project vicinity. We also reviewed a collection of historic photographs and newspaper articles related to the Port at the Columbia Pacific Heritage Museum in Ilwaco. WillametteCRA archaeologist Breanne Taylor conducted a reconnaissance-level assessment of the current study area and archival research on April 27, 2022. Architectural historian Adam Alsobrook conducted an aboveground resource survey, formally documenting the East Bulkhead on June 10, 2022. An Historic Property Inventory (HPI) form was completed for the East Bulkhead (Appendix). We recommend no additional investigations for the projects.

This report details the results of the cultural resources assessment conducted by WillametteCRA. We adhered to the methods and standards required by federal oversight pursuant to Section 106 of the NHPA.



Figure 5. Overview of the shoreline/slope between the East Bulkhead and the West Pier. View facing west.

Environmental and Cultural Setting

Environmental Setting

At a high level, the study area is located in the Coast Range physiographic province. The hilly topography of surrounding landforms are the result of uplifted Miocene-age basalts and sedimentary deposits that date to the Plio-Pleistocene (Franklin and Dyrness 1988). The uplifting and subsequent erosion created the steep slopes and narrow ridges that are characteristic of the Coast Range.

The study area is in the *Picea sitchensis* (Sitka spruce) vegetation zone. This is a narrow zone below 150 m in elevation along the Oregon and Washington coasts. Areas closer to the mouths of rivers are mainly marshlands, while upriver communities are composed of dense, tall shrub communities with scattered Sitka spruce. Other trees in this zone include red alder, black cottonwood, and willow. Sitka spruce is the characteristic tree species of tideland areas and has been referred to as “tideland spruce” since its discovery (Franklin and Dyrness 1988:296). Sprawling Sitka spruce and dense shrubs border tidal flats and channels all along the Oregon and Washington coasts (Franklin and Dyrness 1988:294–296).

Soils in the study area consist of Palix silt loam, cool, 8 to 30 percent slopes across the western and eastern margins of the study area where native soils are present. Palix silt loam is found on coastal headlands, and the typical profile consists of medial silt loam to a depth of 18 inches (in.), overlying 28 in. of medial silty clay loam, over 4 in. of weathered bedrock. These soils typically form in colluvium derived from siltstone subject to wind and wave action. Palix soils are moderately shallow, very well drained silt loam over paralithic bedrock. They are present in tidal areas along the Columbia River and its major tributaries. Infilled and built-up areas in the study area consist of Udorthents, or sandy and loamy river dredging on tidal flats. A typical profile is 60 in. of moderately well drained sandy loam (National Resource Conservation Service [NRCS] 2022).

The study area lies on the north side of the Columbia River, just inside Cape Disappointment and west of the Wallacut River. It is along the north shore of Baker Bay. Given the active hydrogeology of this location and the placement of dredge materials, the general area is relatively low and supports predominantly grass-shrub vegetation including invasives like scotch broom in the few areas that are not built up as an active marina. Much of the area in the southeastern portion of the study area consists of an existing dredge placement berm (Figures 6 and 7).

Early Historic Depictions of the General Study Area

Although several explorers visited the mouth of the Columbia River during the late 1700s, including Captain Robert Gray who passed the Columbia Bar and traveled 20 miles (mi.) upriver in 1792, the first sustained non-Native presence occurred when Lewis and Clark’s Corps of



Figure 6. Overview of existing dredge placement berm from the Ilwaco Boat Launch parking area. Baker Bay to the right. View facing east.



Figure 7. Overview on top of dredge placement at southeastern end of study area. View facing east.

Discovery moved through the lower stretch of the Columbia, staying ten days at their “Station Camp” at the Chinookan village qíq’ayaqilxam in the present-day location of McGowan. Their journals provide detailed descriptions of the area’s topography, wildlife, and Native Peoples in the early 1800s.

Between November 15 and 25, 1805, the Corps of Discovery traveled through Baker Bay between McGowan and Cape Disappointment in Pacific County. On the 17th of November, Captain William Clark noted the return of Meriwether Lewis to Station Camp. Lewis and a party of Chinookan Peoples had gone ahead to scout Cape Disappointment and the Pacific Coast. Clark remarked in his journals that, “Several Chinook Indians followed Capt L – and a Canoe came up with roots mats &c to Sell. those Chinooks made us a present of a rute boiled much resembling the common liquorice in taste and Size.” (Moulton 1990:61).

On November 19, 1805, Captain Clark wrote,

“after takeing a Sumptious brackfast of venison which was rosted on Stiks exposed to the fire, I proceeded on through rugged Country of high hills and Steep hollers on a course from the Cape (Disappointment) N 20° W. 5 miles on a Direct line to the Commencement of a Sandy Coast (Long Beach Peninsula) which extended N. 10° W. from the top of the hill above the Sand Shore to a Point of high land distant near 20 miles. this point I have taken the Liberty of Calling after my particular friend Lewis— at the commencement of this Sand beech the high lands leave the Sea coast in a Direction to Chinook river (and does not touch the Sea Coast again (until) below point Lewis leaveing a low pondey country, maney places open with small ponds in which there is great numbr. of fowl. I am informed that the Chinook Nation inhabit this low country and live in large wood houses on a river which passes through this bottom Parrilal to the Sea coast and falls into the Bay” [Moulton 1990:69–70]

Another land description of the study area comes from the notes of surveyors with the General Land Office (GLO) in 1858. Surveyors described the current study area as, “Level along the bank between Sections 35 and 36 and a portion of 34 to the left bank of the Walicot (sic) River all mostly prairie with some scattering Alder, Willows, etc. Soil 2nd rate. Balance in Sections 33 and 34 banks some broken. Soil good 2nd rate, timbered with Hemlock and Spruce, undergrowth Sallal (sic)” (Reed 1858:29).

Twentieth Century Landform Modification

Prior to the development of the Port’s mooring basin during the 1940s and 1950s, the landform shifted substantially due to strong currents at the mouth of the Columbia, erosion, and dredging. Most notably, the shoreline would have been significantly north of the current study area and present-day waterfront. Several streets and street segments were built during the 1970s. The area underneath First Ave S, Jessie’s Drive, Howerton Way SE, Pearl Ave SE, Howerton Ave, and Waterfront Way would have been filled and built up. The current area is not consistent with

the original shoreline. By the turn of the twentieth century, two piers were built into Baker Bay from the Ilwaco shoreline. These would have been within the current study area. One served as the trestle for the Ilwaco Railway and Navigation Company line. The POI was officially opened in 1930. The construction of the mooring basin and associated developments followed in 1946. These activities reshaped the current study area through dredging and infilling.

Archaeological Context

The last 6,000 years of Northwest Coast prehistory saw dramatic changes in Native lifeways, including increased populations and density, and the appearance of different settlement patterns hinged on winter sedentism and increased logistical mobility. These changes were largely enabled by development of complex food storage technology, resource diversification and intensification, and increased social complexity (Ames 1994; Ames and Maschner 1999).

There is little to no evidence of human presence at the mouth of the Columbia from the Archaic Period (circa [ca.] 11,000–5500 B.P.) or before (Clovis or other first inhabitants of the continent). This is likely due to rising sea levels that have submerged the earliest sites combined with sedimentation in near-river settings. Assemblages from sites of this age in the region contain stemmed or large leaf-shaped points often dubbed Cascade points and like those found along Young's River at Astoria. Sites farther upstream at The Dalles contain evidence of intensive salmon harvesting as early as 9000 B.P., indicating that people of that time were well accustomed to the riverine environment offered at this location (Ames and Maschner 1999).

The Early Pacific Period (ca. 5500–3500 B.P.) was characterized by a cooler and moister climate, and sea level was still low along Washington and Oregon (Ames and Maschner 1999). Early Pacific sites are relatively rare along the lower Columbia River but are found more frequently to the north. Assemblages often contain broad-necked, large stemmed, and side-notched points. Bone and antler tools increase dramatically in frequency, ground stone appears, and microblades disappear. Resource use was diverse, suggesting a broad-spectrum diet, and few special purpose camps are evident. Storage was likely practiced in a limited fashion throughout the Early Pacific, but it did not become widespread until around 3,500 years ago (Ames and Maschner 1999). No evidence for plank houses dating to the Early Pacific has been found.

By the beginning of the Middle Pacific period (ca. 3500–1500 B.P.) modern climatic conditions were in place and sea level approached current elevations. The basic economic and technological traits observed at historic contact are often found (Wessen 1983). Square or rectangular plank houses and villages appear elsewhere on the coast after about 3,500 B.P., although the earliest houses in the Portland Basin-Lower Columbia are about 2,000 years old (Ames 1994).

Most investigated sites in the region generally and the Lower Columbia specifically, date to after about 1,500 years ago, the Late Pacific period (ca. 1500–100 B.P.). Site frequency increased

dramatically, particularly on the lowlands (Ames 1994; Wessen 1983). Assemblages are diverse and contain small, triangular-shaped, narrow-stemmed projectile points. Several Late Pacific period sites in the Portland Basin have been investigated in some manner, with the best-known examples dating to the past 800 years, including Meier and Cathlapotle sites.

Native Peoples

Based on historical accounts and ethnographic data, present-day Ilwaco and the land along the lower Columbia River is within the traditional homeland of the Chinookan peoples, specifically the Lower Chinook (Silverstein 1990:533), today represented by the Chinook Nation of Baycenter, Washington, the Confederated Tribes of Grand Ronde, the Siletz Tribe of Indians, and the Cowlitz Indian Tribe (Boyd and Ames 2013). At the time of European American contact, various Chinookan-speaking groups occupied the Columbia River valley from The Dalles to the Pacific Ocean. Ethnographers today differentiate the Chinook primarily on linguistic variation. Speakers of the Lower Chinookan language included the Clatsop and Chinook proper, who lived around the mouth of the Columbia River; the Clatsop resided on the southern shore, and the Chinook proper were to the north. Upper Chinookan speakers occupied the neighboring upriver areas (Silverstein 1990:533–535). The link to their homeland is manifested in traditional stories, explaining the existence of the landscape (Ellis 2013:42).

Ethnographic or academic descriptions of the Chinook people began in the early 1900s (Curtis ca. 1910a, 1910b; Farrand ca. 1905; French and French 1998; Hajda 1984; Harrington 1909; Hodge 1971; Jacobs 1929–30; Ray 1938). We also reviewed the unpublished ethnographic field notes of John Peabody Harrington, an anthropologist and linguist who conducted fieldwork from 1942 to 1943 with Salish and Chinook-speaking people throughout southwest Washington. Ethnographic accounts from this period provide a useful reference for understanding certain aspects of traditional lifeways but should be interpreted as biased and potentially inaccurate due to the period, racial relations, and the power dynamics inherent in ethnographic research.

Lower Chinook Traditional Economy

Ties of kinship through “blood” and marriage usually defined where individuals lived and rights of access to resource locations. As individuals often married outside their home villages, most families had networks of relationships that crossed both linguistic and cultural boundaries. While salmon was the primary staple, other fish were also harvested, using a variety of methods, including weirs, nets, and seines, as well as spear and gaff-and-hook. People also hunted game and waterfowl among the numerous marshes, lakes, and streams in surrounding low-lying areas and collected roots such as wapato, fruits, and berries (Silverstein 1990:536). The traditional significance of the cultural plants and animals are well rooted within the customs, beliefs, and practices of the Tribes and evident through traditional patterns of land use, which see little distinction between natural and cultural resources, and marked by “an elaborate preparation” that “characterized the first Chinook salmon ceremony” (Silverstein 1990:536).

Place Names in Study Area

Places with American Indian language names demonstrate Tribal presence, as testaments to Tribal history and culture and show the connection between the Tribal community and their homelands. The retention of place names in Native languages can be associated with family oral histories (Duffy and Feeney 2000:31) and Tribal traditional stories (Hunn et al. 2015). Place names can describe resources in the area, relationships with the land, and the experiences of the people with the land. Place names have special meaning to the people that live in the vicinity of these traditional use sites (Hanes and Hansis 1995:3). A place name contains a wealth of historical and ecological information and illustrates the dependence on the land and the resources contained on the land by the Indigenous people (Hunn 1990). Named places can be historic properties of religious and cultural significance to the Tribal communities. Following is a sample of American Indian language place names readily available through literature review and archival research. This is intended as a sample and by no means to be exhaustive.

There are at least three named village sites on the shores of Baker Bay shown on Figure 8 and Table 1 below (Ellis 2013; Zenk et al. 2016:8). Number 12, wíitčutk ‘road coming down’ (Chinookan) or núʔsqʷəl̥xʷł̥, núʔsqʷəl̥’əxʷšəw’ł̥ ‘where the trail comes out’ (Salishan) would have been the closest to our current study area. The Chinook (c’inúk, činúkʷ) village, wíitčutk would have been part of a network of riverfront villages inhabited during the spring and summer months, and largely vacant in the winter months, when families would relocate to inland winter villages. The villages that lined Baker Bay would have been geographically separated but connected as part of a large social community in the region that included fishing locales, plant harvesting areas, and burial grounds. They were linked to the Pacific Ocean and use sites at Cape Disappointment by a well-traveled Chinookan trail (Deur 2016:12, 22). In 1850, Edward Curtis indicated that the village wíitčutk held 15 houses (Ellis 2013:7–8).

Table 1. Place Names in the Study Area Vicinity.

Map Number	Name	Meaning	Reference
12	wíitčutk	‘road coming down’ (Chinookan)	Ellis 2013:8
	núʔsqʷəl̥xʷł̥, núʔsqʷəl̥’əxʷšəw’ł̥ ‡	‘where the trail comes out’ (Salishan)	Ellis 2013:8
13	c’inúk	(Local Salishan)	Pedestrian Survey and Shovel Probes
	činúkʷ, čtčinúkʷ	(Local Salishan)	Ellis 2013:8
14	qíq’ayaqilxam	‘middle town’ (Chinookan)	Ellis 2013:9
	kʷacámč’	‘in the middle’ (Salishan)	Ellis 2013:9

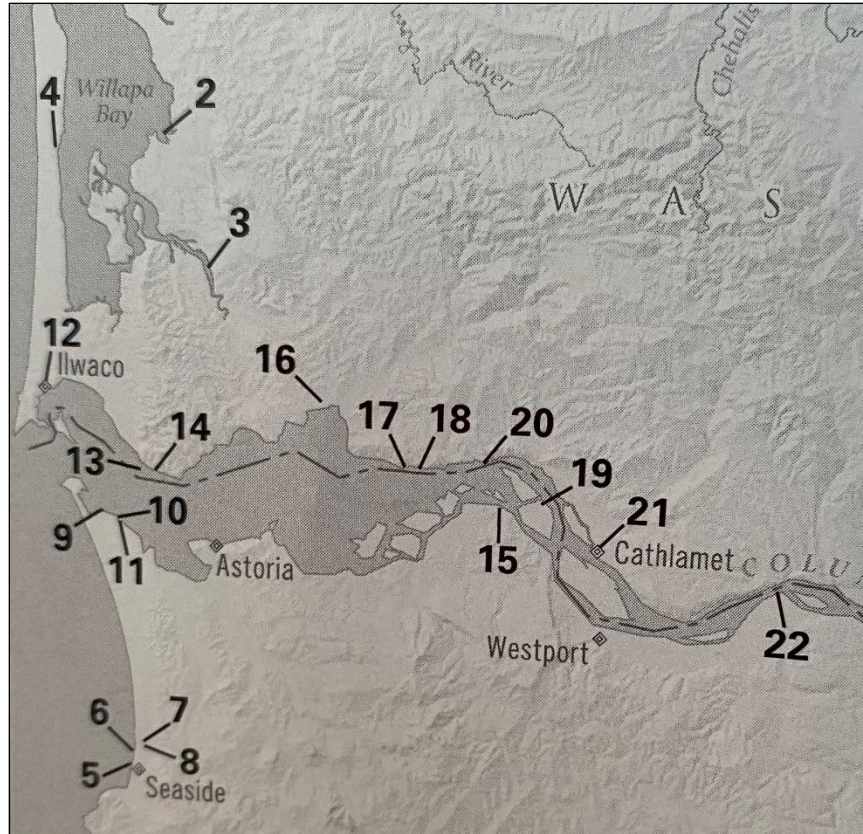


Figure 8. Village place names in the study area vicinity (Zenk et al. 2016:Figure 1).

Historic Era to the Present

By the 1840s the character of the Native settlements throughout the lower Columbia River drainage had been radically altered by epidemics of introduced European diseases. A smallpox epidemic is known to have struck the lower Columbia region in the 1770s and is estimated to have killed about a third of the Native population. Native peoples experienced periodic outbreaks of smallpox and possibly other introduced diseases such as measles through the 1860s. At the time of contact between Native peoples of the lower Columbia and Lewis and Clark's Corps of Discovery, populations had already dwindled considerably. Native peoples who lived at or near the mouth of the Columbia River would have been especially vulnerable as the first groups encountered by the ships of explorers and navigators in the 1700s (Deur 2016:22). For the people of the region, the most devastating epidemic was an outbreak of malaria in the 1830s. This epidemic devastated the Native communities of the lower Columbia region, destroying entire villages in a matter of days or weeks and eventually spreading east of the Cascade Range and south to northern California (Boyd 1990:146–147, 1999:233–238).

The Native population of the Willamette Valley and the lower Columbia River was reduced by 75 to 90% or higher. Boyd (1999:Table 3) has estimated that Cathlamet, Multnomah, Clackamas,

and Cascades populations declined from about 12,000 in around 1800 to 300 by the 1850s (a population loss of almost 98%). These statistics coldly demonstrate what was undoubtedly a terrifying and devastating experience for the people struck by the disease. The oral tradition of the effects of the epidemic continued until at least the 1930s among some of the groups affected.

Further devastation followed with the establishment of reservations and unratified treaty negotiations during the 1850s. The insistence by the federal government to ‘clear title’ for permanent white settlement and resource extraction led to a series of 1851 treaties at Tansey Point with the Tribes of the lower Columbia. During these meetings, the Lower Chinook were allowed to stay on their lands north of the Columbia as “de facto reservations,” however the treaties were never ratified, and the Tribal status of the Chinook was not recognized. This resulted in the increased displacement of Native peoples by white settlers who claimed traditional lands under federal land legislation during the 1850s and 1860s.

In 1866, the Shoalwater Bay reservation was created, though by then some Chinook had relocated to the Grand Ronde and Siletz reservations in Oregon, and to the Chehalis and Cowlitz reservations in Washington (Fisher and Jette 2013:292). The many Chinook people who stayed in their homeland rather than going to one of the reservations, were briefly recognized by the federal government from 2001 to 2002 (Fisher and Jette 2013:288–306) and now represent five separate groups of Chinook people; the Lower Chinook, Clatsop, Wahkiakum, Kathlamet and Willapa (Chinook Indian Nation 2022). Federal Acknowledgement was granted to the Chinook Indian Nation in 2001 but reversed by President George W. Bush a mere 18 months later. The reversal was due in part to the objection of Federal status by neighboring Tribes over territorial rights (Chinook Indian Nation 2022; Smith 2021). It is important to note that the Shoalwater Bay are a Federally recognized Tribe, while the Chinook Nation is not, though many of the members of both share common ancestors and are therefore related.

The Chinook people who enrolled with other federally recognized Tribes in Oregon also suffered termination. By 1947, the United States government concluded that there was no longer a need for federal support, indicating that the people on the reservations had been fully “assimilated.” In 1954, the Grand Ronde Reservation was terminated by the United States Government and the Siletz in 1955. Those who wanted to stay on reservation lands allotted to them under the 1887 Dawes Act were forced to purchase it from the government. In 1974, the Tribes of the Grand Ronde Reservation were reorganized as The Confederated Tribes of the Grand Ronde. In 1977 Congress restored the Siletz Tribe, and in 1983, the Grand Ronde Tribes (The Confederated Tribes of the Grand Ronde 2022; Wilkinson 2010). For the people whose traditional homeland includes the study area, the connection to the land has never ceased or been lost, despite removal to reservation.

Tribal use of the area stretches back to time immemorial and extends across a much larger area than the current projects, all of which is traditionally significant to its original inhabitants, as it

was to their ancestors, and to their descendants. The Tribal worldview is one of interconnected entities, and traditional use does not take place in discrete, unconnected areas. Tribal members often perceive the entire landscape as one interconnected entity, and can seamlessly incorporate oral history with natural features, resource use, and spirituality. The individual places to which they traveled to hunt, fish, gather, or engage in other cultural activities were and still are interdependent (Stoffle et al. 1997:231). While the traditions of going to some of these areas may have been disrupted, Indian people may have an oral history of the events that occurred in these areas. Tribal use of the land, as many aspects of the traditional economy of hunting, fishing, and gathering, may not have left easily identifiable physical manifestation on the land (i.e., archaeological sites). Neither do named places, geographic points significant in oral histories and creation stories, or places where cultural activities may have taken place. These can only be identified through knowledge of Tribal culture.

Historic Background and Map Review

The first documented non-Native in the study area vicinity was the Spanish Explorer Bruno de Hezeta, who identified the mouth of the Columbia River from the Pacific Ocean in 1775 but was unable to cross the bar into the lower stretches of the river. Hezeta named the area Cabo San Roque. In 1788, John Meares renamed the area Cape Disappointment when he failed to find the Columbia River, not recognizing the outlet as a major waterway. Meares identified the mouth of the Columbia and Baker Bay, noting,

“...a large bay, as we had imagined, opened to our view, that bore a very promising appearance and into which we steered with encouraging expectation...As we steered in, the water shoaled to nine, eight, and seven fathoms, when the breakers were seen from the deck, right a-head; and, from the mast-head, they were observed to extend across the bay. We therefore hauled out...The name of Cape Disappointment was given to the promontory, and the bay obtained the title of Deception Bay...We can now with safety assert, that there is no such river as that of Saint Roc [San Roque] exists, as laid down in the Spanish charts” [Lamb 1984:497]

In April of 1792, The Voyage of Discovery, led by Captain George Vancouver, passed this stretch of the Pacific coastline. Vancouver noted Meares’ Cape Disappointment and Disappointment Bay, while also failing to identify the greater Columbia River. Captain Vancouver did not consider the “bay” worth additional exploration. Likely dissuaded by the constraints of time and the dangerous conditions of the Columbia River bar, he continued to map the coastline to the north (Lamb 1984:497–498).

In May of 1792 (the following month), Captain Robert Gray explored the lower Columbia River, naming it after his ship the *Columbia Rediviva*. Gray was the first to cross the treacherous river bar, and he traveled approximately 20 mi. upriver (Howay 1969). In the fall of 1792, Vancouver

and the Voyage of Discovery returned to the area. Lieutenant William Broughton was the first person to measure the depth of waters at the mouth of the Columbia River (Vancouver and Broughton 1798:71).

In November of 1805 the peoples of qíq'ayaqilxam were met by members of the Corps of Discovery when Lewis and Clark established their lower Columbia River base camp at Middle Village. This "Station Camp" became the jumping off point for overland excursions to the Pacific. The Corps spent a total of 10 days here. Extensive archaeological work has been conducted at the site (45PC106) and the area is part of the Lewis and Clark National Historical Park (Wilson et al. 2009). Between November 15 and 25 of 1805, Lewis and Clark camped at this location near Chinook Point, "Miles to a point of a low bottom on the Stard. Side (where we Encamped 10 days in a narrow bottom Slashey in full view of the Ocian) passed a Small Creek at 1 mile an old Chin nook Village of 36 houses at 1 ½ miles a butifull Sand beech and narrow bottom below the Creek on Stard." (Moulton 1990:59).

During their stay in November, the village qíq'ayaqilxam was largely empty, and the Expedition assumed that the inhabitants were either away hunting or relocated to winter houses at present-day Willapa Bay (McDonald 1989:24). Lower Columbia village populations did vary seasonally, and populations relocated to inland sites for the winter (Zenk et al. 2016:18). Between Lewis and Clark's exploration of the lower Columbia and the decline of the fur trade in the 1830s, Baker Bay was visited repeatedly by British and American fur ships. In 1806, the Russian ship, *Juno*, made it to the mouth of the Columbia River to establish a settlement on the river, but was unable to breach the river bar (McDonald 1989:25). The fur trade in this part of the Columbia River was supported by the establishment of Fort Astoria on the south side of the river in 1811. The fort was built by John Jacob Astor's Pacific Fur Company and became the first American establishment on the west coast. In 1813, the fort was purchased by the North West Company (NWC), a Canadian outfit that renamed the post Fort George. In 1821, the Hudson's Bay Company (HBC) subsumed NWC, eventually operating the fort as a satellite of Fort Vancouver, upriver (McDonald 1989:30–32).

One of the earliest non-Natives to permanently settle in the Ilwaco area was a Black Peruvian man named James DeSaule (commonly referred to as Sanler or Saule). In 1841, DeSaule was working as a cook onboard the Wilkes Expedition's vessel, the U.S.S. *Peacock* when it capsized off Cape Disappointment. All the *Peacock's* crew survived the wreck, and the Wilkes Expedition returned two years later to continue charting the lower Columbia. DeSaule stayed behind, first working in a kitchen in Astoria and eventually building a house at Cape Disappointment and founding a freight service based in Ilwaco (Deur 2016:81–82; Hardina 2020; McDonald 1989:34–36). When British Lieutenants were sent to map the Cape for the development of a potential battery, they found DeSaule already established there. The efforts of the Wilkes Expedition to map and chart the mouth of the Columbia and the lower reaches of the river were

hailed as a national, scientific success and served as a catalyst for American dominance, treaty negotiations and westward expansion, in a region previously presided over by the British HBC.

By the 1840s, large numbers of settlers were flooding into the Willamette Valley via the Oregon Trail. Fueled by Manifest Destiny and federal land legislation that supported the Doctrine of Discovery, a massive land grab began in earnest under acts like the Donation Land Act of 1850 and the Homestead Act of 1862. This extended to the Pacific Coast by the late 1840s. The Donation Land Act allowed for married couples who settled in the west by 1850 to claim up to 640 acres to settle and improve. This included the current study area which was claimed by James and Rachel Holman and James and Jane Johnson, who both acquired portions of Section 33. The Johnsons would have also owned the portion of the study area within Section 34 (Bureau of Land Management [BLM] 2022). The Johnsons' house is depicted on the 1859 GLO map of Township 10 North, Range 11 West, approximately 82 m north of the study area (Figure 9). This would have been the closest development to the study area at the time (GLO 1859). James Johnson was a Scottish boat captain employed by the HBC. He lived at the Ilwaco Townsite by 1848. He worked as a bar pilot at the mouth of the Columbia and was married to a Chinookan woman at Fort George. Her name is listed on their Donation Land Claim simply as "Jane," but her given name was Comtia Koholwish (BLM 2022; McChesney et al. 2002:50, photograph; McDonald 1989:40–42).

Following the death of James Johnson, the property and house was sold to Isaac Whealdon, who became postmaster, with the house serving as the first Post Office of Ilwaco, which was then known as "Unity" (McDonald 1989:83-84). In 1870, a formal stage route was built between Unity and Oysterville and a dock was built at the Ilwaco port in 1874 (McDonald 1989:83–84).

U.S. Coast and Geodetic Survey (USC&GS) maps from the 1850s depict an undeveloped Ilwaco and the shoals of Baker Bay with alternating hard and soft sands. Leading in Bluff is shown to the east and Cape Disappointment to the west is mapped with the alternate name Cape Hancock (USC&GS 1851, 1854). In 1862, a garrison was established at Cape Disappointment to protect the entrance to the Columbia from Confederate troops and foreign entities. The following year, Fort Stevens was established on the southern side of the river mouth. In 1864, the fort was renamed Fort Cape Disappointment and again in 1875 to Fort Canby.

By 1870, four houses and one unoccupied building or warehouse are depicted on a USC&GS map, approximately 210 m north of the current study area, off the historic shoreline of Ilwaco. Informal road networks connected these structures to the hills above (Figure 10; USC&GS 1870, 1874). Additionally, several houses and associated agricultural fields are shown to the east, in the flats around the Wallacut River (see Figure 9). By this time, the lighthouse at Cape Disappointment was mapped (USC&GS 1870).

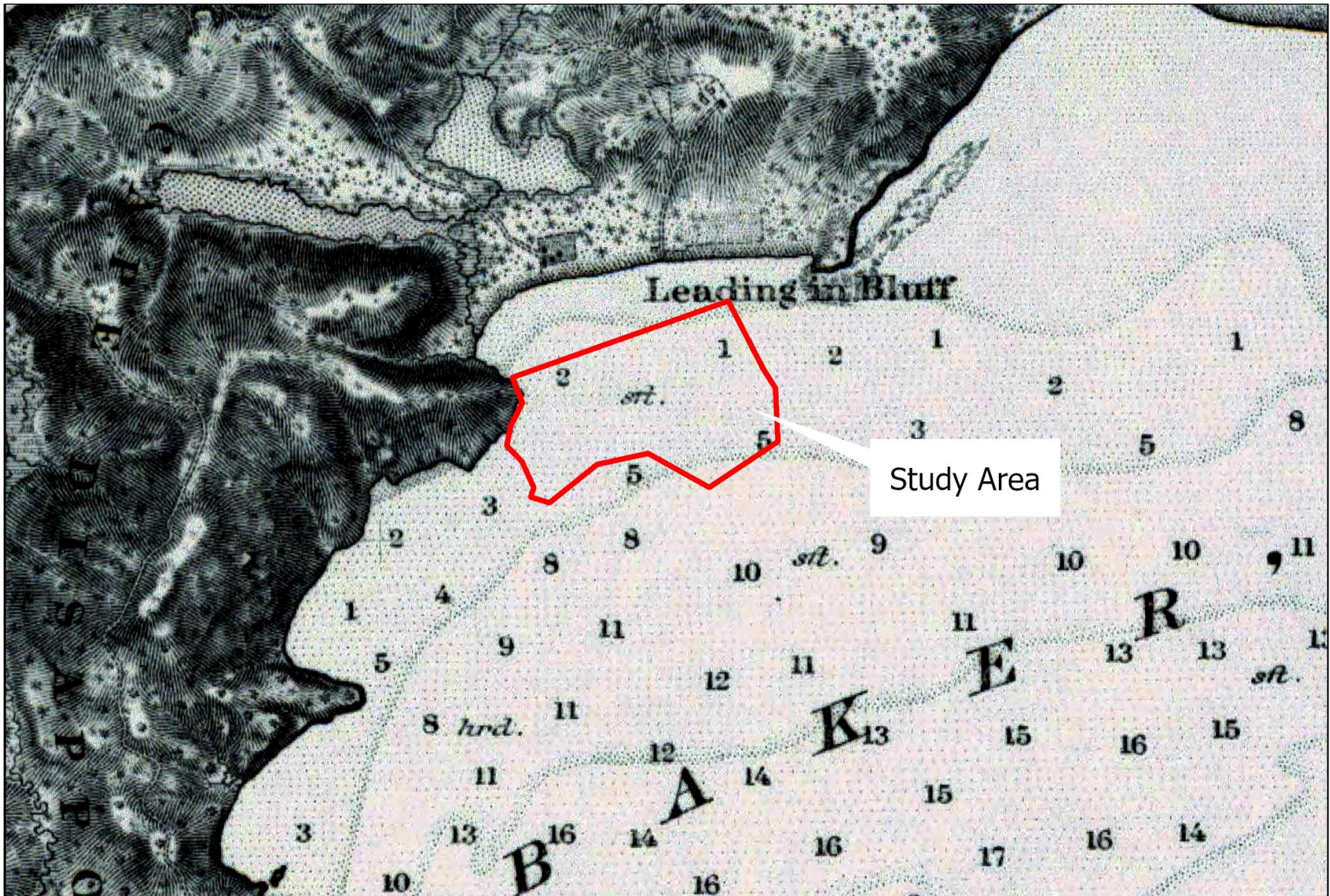


Figure 10. Study area depicted on USC&GS map from 1870.

By the turn of the twentieth century, Ilwaco served as a thriving stopping off point for people traveling to the Long Beach Peninsula and a home for fishermen working in Baker Bay. It offered a hub for travelers taking ferries and stagecoaches from Astoria to the Puget Sound. The town plat was filed in 1876 and Ilwaco was officially incorporated in 1890 (Becker 2012). The 1880s witnessed the prominence of gillnet fishing in Baker Bay. Gillnetters were soon rivaled by fisherman and companies with the means to establish permanent traps. By the turn of the twentieth century, there were hundreds of these traps lining the Bay. An 1881 U.S. Engineers map shows numerous fish traps, from Aberdeen Cannery near Ilwaco to McGowan's Cannery at Chinook Point on the Washington side of the Columbia (USACE 1881). By 1892, the number of seines mapped had nearly tripled (U.S. Commission of Fish and Fisheries 1892). Fish traps made it possible to produce massive yields, causing overfishing in Baker Bay. They were banned by Washington State in 1934 (Becker 2012).

In 1888, the Ilwaco Railway and Navigation Company (IR&NC) railroad was constructed to replace the stage route from Ilwaco to Oysterville. The line ran to Nahcotta, where the water was deeper than Oysterville, from the wharf at Ilwaco (Figure 11). One of the largest exports from the region during this period were oysters; thousands of pounds were shipped to cities like San Francisco. Clams and cranberries were also moved out of the Long Beach Peninsula and Ilwaco by way of the active ports at Astoria (Becker 2012; McDonald 1989:98–100). The IR&NC line, or so-called “Clamshell Railroad” was abandoned in 1930 and Highway 103 was built over it (Becker 2012; McDonald 1989:98–104).

Early Development of the Port of Ilwaco and the Mooring Basin

The original topography of the Long Beach Peninsula to the west and Sand Island to the east protected the waters along the west shore of Baker Bay and provided a sheltered anchorage for mariners to wait out bad weather. The waters in the vicinity were also originally much deeper than today, and early European American settlers Elijah White and James Holman were among the first European American settlers to envision a deep-water seaport on the Long Beach Peninsula (US Coast and Geodetic Survey [USC&GS] 1851; Williams 1924:49).

Lewis Alfred Loomis, an early European American settler of the Long Beach peninsula, was instrumental in developing the earliest vessel docking facilities at Ilwaco. Lewis and his brother Edwin raised sheep on their land claim, which was in the vicinity of present-day Lake Loomis State Park. To address his need for a wharf to handle his outgoing wool, Lewis Alfred Loomis incorporated the Ilwaco Wharf Company in July 1874 (The Oregonian 1913; Williams 1924:55). In 1881, the 135 m long wharf was lengthened to 180 m to reach deeper water farther from shore. The wharf was also widened by 3 m (The Morning Astorian 1881a, 1881b).

By 1901, USC&GS maps show the formal plat of Ilwaco (USC&GS 1901). At this time, the original shoreline was still more than 100 m north of the boundary of the current study area, and two piers had been built out into Baker Bay within the study area bounds. The pier along the



Figure 11. Overview of the Ilwaco Railway and Navigation Company terminus at the Ilwaco Wharf. Photo courtesy of Oregon Historical Society.

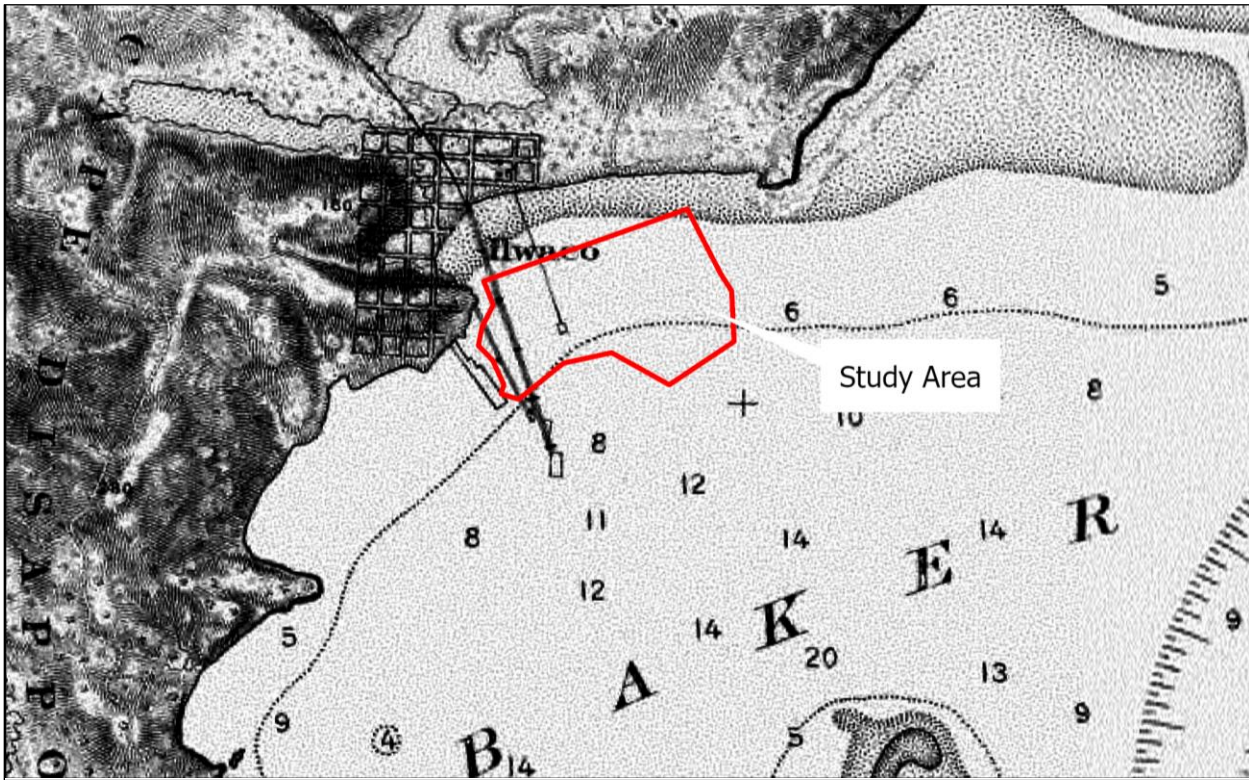


Figure 12. Study area depicted on 1901 USC&GS map, showing railroad trestle and pier.

west boundary of the current study area was the Ilwaco Wharf Company's pier of 1874–1881, which connected the IR&NC line from the Long Beach Peninsula to a landing approximately 760 m into the Bay (Figure 12). The 1901 map shows another parallel pier approximately 90 m east of the IR&NC pier. This east pier extended approximately 210 m into Baker Bay. The 1901 map also depicts the Ilwaco Landing at Robert Gray Drive, just west of the current study area. The IR&NC pier and the present-day Ilwaco Landing served as the terminus for trains and steamboats in the region up until 1908 (McDonald 1989:21).

In the late nineteenth and early twentieth centuries, silt buildup in Baker Bay emerged as a threat to the viability of Ilwaco as a port for deep draft vessels (Ott 2010). In 1889, mariners and river pilots noted that Sand Island had shifted to the north by roughly 2 mi. since about 1869. The movement of Sand Island caused Baker Bay to fill with silt, and the pilots grew concerned that Ilwaco would soon be inaccessible by ship (North Pacific History Company 1889:103). The first major dredging project in Baker Bay occurred in 1913 when a channel was established between Ilwaco and the western tip of Sand Island (The Oregon Daily Journal 1913).

By 1929, the section of the IR&NC pier between the Ilwaco Mill & Lumber Company and the former IR&NC freight dock and car barn on a platform over Baker Bay had been removed (Sanborn 1909, 1929). By that same year, the pier east of the IR&NC pier had become home to the Pioneer Packing Company Clam & Fish Cannery (Sanborn 1909, 1929). The pier was about 6 m wide and originated at a point approximately 75 m east of the present-day intersection of Eagle Street SW and First Avenue S and extended approximately 180 m out to the platform that supported the cannery buildings. This platform measured approximately 30 m by 75 m, with the long axis of the platform roughly aligned in a south-southeast / north-northwest direction. The east pier extended approximately 150 m to 180 m beyond the Pioneer Packing Company platform and then turned 90 degrees westward and connected with the platform supporting the J.P. McGowan & Sons Fish Cannery. Overall, the east pier extended approximately 425 m into Baker Bay (Sanborn 1929).

In 1911, Washington State passed the Port District Act which made ports public. This laid the groundwork for the formation of the POI and funding for its dredging and improvement projects, including the construction of a publicly accessible dock. In 1928 voters approved the development plans for the POI and two years later the Port was opened (The Oregonian 1930; Ott 2010). The newly created port soon received federal assistance in making navigation improvements, and in 1932 the USACE approved a plan to construct a new 60 m wide, 3 m deep channel north of Sand Island (The Oregonian 1932, 1938; USC&GS 1948). However, this channel was not officially completed until 1938 (The Oregonian 1938; USC&GS 1948).

Development of the Port of Ilwaco Mooring Basin

Plans for new port facilities at Ilwaco were first announced in November 1946 (The Oregonian 1946). The project plans included a mooring basin and breakwater to accommodate more

fishing fleets and improve storm protection. The Port could house up to 50 fishing boats in 1946, and the proposed project included mooring space for 300 additional boats (The Oregonian 1946; Port of Ilwaco 1946). The mooring basin and channel were to be dredged to a depth of 15 ft. (4.5 m). Dredging maintenance would be completed annually with the materials deposited in an area southeast of the breakwater (Port of Ilwaco 1946).

Construction on the mooring basin did not begin until 1957 (The Oregonian 1957a, 1957b; USGS 1956). The original shoreline was still present in 1950 and marked on a *Metsker Atlas of Pacific County* as, “First Rate Tidelands” (Metsker Maps 1950). At this time, the shoreline was located north of the study area, just south of Lake Street SE and Main Street SE (Figures 13 and 14). Dredge materials were placed at the waterfront edge, thus beginning the infill of lots along present-day Howerton Avenue and Waterfront Way (Ott 2010). The 1946 mooring basin plans called for the construction of a timber pile and stone bulkhead along the north boundary of the mooring basin, which coincides with the north extent of the current study area. However, it appears that this bulkhead was not constructed as planned (USGS 1971).

The new 500-boat mooring basin was dedicated in 1959 (The Oregonian 1959). The 1959 nautical chart for Baker Bay shows the breakwater and approximate areas covered by dredge materials to the north of the mooring basin (USGS 1956). The present-day shoreline along the north extent of the current study area is situated approximately 150 m to 180 m out from the original shoreline. This area was continually infilled and built upon with several roads, including Howerton Avenue and Waterfront Way during the 1970s, and this transition is shown on topographical maps from the mid-century (Figures 15 and 16; USGS 1949, 1951, 1955, 1957, 1963, 1974, 1977, 1980).

The new mooring basin proved extremely popular and in May 1961 plans were announced to expand the moorage to accommodate 300 more boats (The Oregonian 1961). These plans were scaled back slightly, and in October 1962, the POI applied for a permit to dredge the mud banks within the moorage breakwater and build berths for an additional 180 boats (The Oregonian 1962).

In March 1965, the USACE announced plans to construct a new breakwater across the Holman waterway west and south of the mooring basin. Plans included cutting off the existing pier (formerly the home of the Pioneer Packing Company cannery) to accommodate the new breakwater, which would also create moorage space for additional boats (The Oregonian 1965). Aerial photographs indicate that this work was underway by 1971 (USGS 1969, 1971).



Figure 13. Aerial photograph of the proposed Ilwaco Mooring Basin, showing original shoreline. Wavy lines delineate infill and current extent. Photo courtesy of Columbia Pacific Heritage Museum. View is northwest.



Figure 14. Overview of the study area in 1946, prior to mooring basin construction. View facing west. Courtesy of Columbia Pacific Heritage Museum.

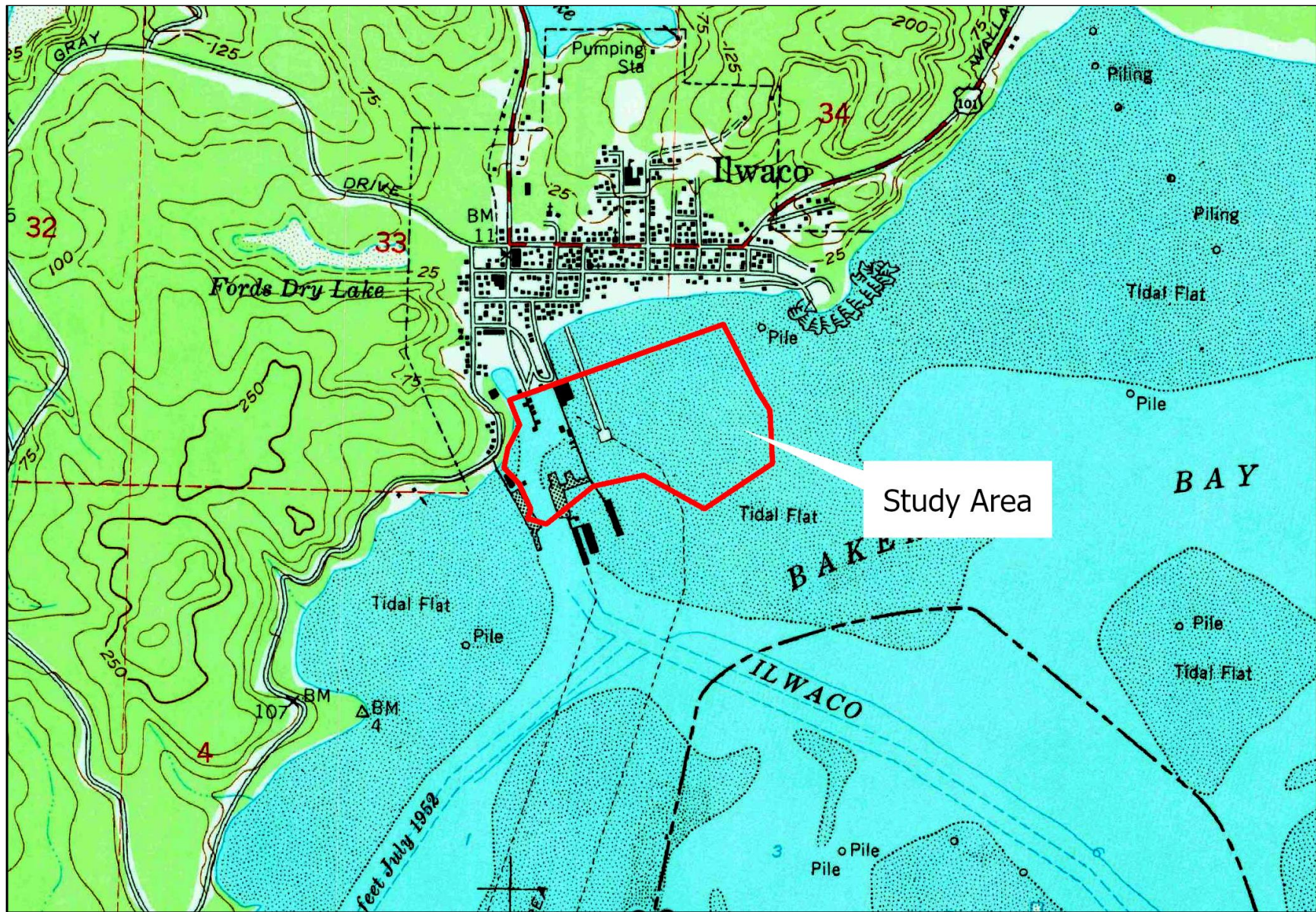


Figure 15. Study area depicted on USGS topographic, *Cape Disappointment*, edition 1974.

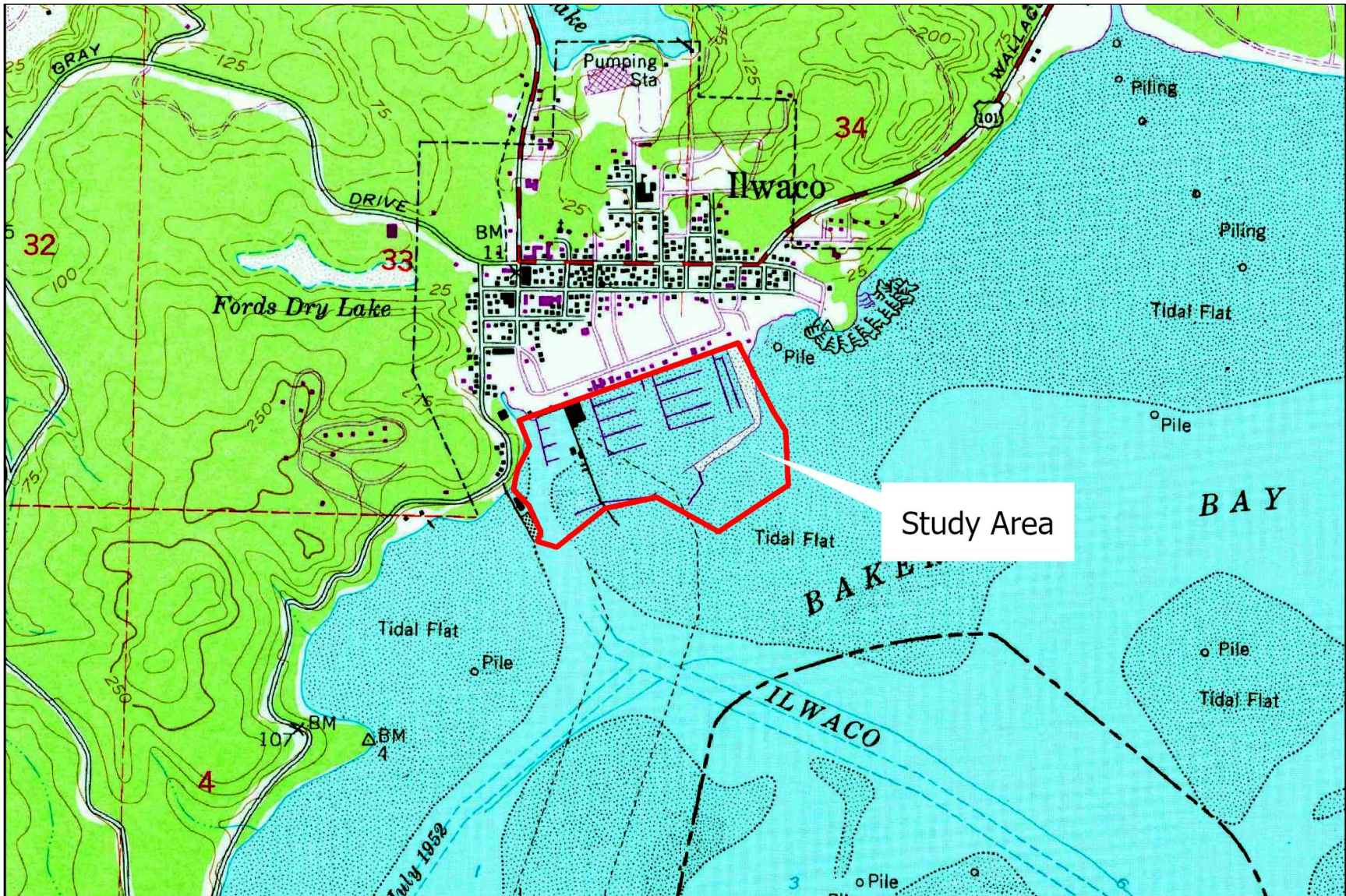


Figure 16. Study area depicted on USGS topographic, *Cape Disappointment*, edition 1977.

Construction of the Port of Ilwaco East Bulkhead

By 1968, the filling in of the former tidelands made the former Pioneer Packing Company cannery platform into a peninsula at the northwest corner of the mooring basin (USC&GS 1968; USGS 1969). The former Pioneer Packing Company cannery became Jessie's Ilwaco Fish Company in 1961, and the property is now home to Safe Coast Seafoods. The original footprint of the platform supporting the Pioneer Packing Company building was approximately 30 m by 75 m in size, with the long axis of the platform roughly aligned in a south-southeast/north-northwest direction. A 1956 aerial photograph shows the original narrower platform, which was expanded to the east by 1968 to create a vehicular driveway (USC&GS 1968; USGS 1956, 1969). By 1974, the overall configuration of the current Safe Coast Seafoods facility was largely complete and like the conditions found today (USGS 1974).

The East Bulkhead runs 50 m along the east edge of the vehicular driveway located east of the Safe Coast Seafood buildings. The middle of the structure bulges outward by approximately 2 to 3 ft. The East Bulkhead is built of 118 creosote treated timber piles. These piles vary from approximately 12 in. to 16 in. in diameter. Of the 118 piles, the upper portions of 18 piles are broken off or missing, and the tops of an additional 26 piles are severely deteriorated. In addition to the deteriorated piles, about one-third of the piles appear to be relatively recent replacements, based on the lack of wood deterioration, creosote seepage, and lack of biological growth on the surfaces of the piles. Horizontal creosote treated timber lagging is mounted on the inboard side of the bulkhead to retain the stone and earth fill material. Creosote treated timber walers are mounted on the outboard face of the bulkhead and are secured to the structure with wire strand cables. Three galvanized steel piles are mounted outboard of the walers to fend off docked vessels.

Following the decline of salmon runs and the outlaw of fish traps in the 1930s, deep sea fishing became the predominant marine industry in the region and enhancements to the Port were needed to accommodate the growth, which included new fishing fleets moving from the harbor to the Pacific and the deep waters of the Columbia. Through this period, Ilwaco continued to be the primary port in Pacific County for cranberry growers, fishermen, and loggers in the region. Industries at the Port included seafood processors, canneries, and mineral companies. The 1930s and 1940s witnessed the rise in sports fishing, and the Port held competitions and events (Ott 2010).

In 1974, the federal case *U.S. v. Washington* resulted in legal fishing rights for Native fishermen from signatory Tribes. Tribal fishermen would now be allowed to harvest half of available fish during the season. This resulted in a decrease of commercial fishing fleets at the Port and increased hostilities between Native and non-Native fishermen in the lower Columbia (Ott 2010).

From the 1980s onward, the POI has undergone a series of revitalization projects to increase tourism, including the development of new facilities for recreational boating and fishing, hotels, restaurants, and shops. Due to the continued decline in salmon runs, fishing companies run out of the Port have shifted to harvesting additional species like Dungeness crab, Albacore tuna, and Pacific shrimp (Ott 2010).

Previous Archaeological Investigations

WillametteCRA reviewed records on file with the Oregon SHPO online database, Oregon Archaeological Records Remote Access (OARRA) and DAHP's online database WISSARD, to determine if previous archaeological investigations and/or archaeological resources occur within a one-mi. radius of the study area. Tables 2 and 3 summarize our findings.

The POI has not been previously surveyed, and no archaeological resources have been documented in the study area. However, 11 previous archaeological investigations have occurred within a 1 mi. search radius of the study area. Prior work is focused north of the study area within the City of Ilwaco and mainly identified historic-period resources. The nearest investigations were conducted within 80 m of the study area and included a pedestrian survey and monitoring work (Freed 2013; Hulse and Smits 2022). The survey work was conducted for the city of Ilwaco's Elizabeth Street improvement projects in 2013 and included pedestrian survey. No shovel probes were excavated at this time due to the development of the area and no archaeological resources were encountered (Freed 2013). The monitoring project occurred in 2022, parallel to the study area on Howerton Way SE Street for a proposed stormwater management project. Archaeologists observed the excavation of 5 exploratory borings to a depth of 1.5 m. All samples were determined to be fill and were negative for cultural material (Hulse and Smits 2022). The remaining surveys were predominately conducted by the City of Ilwaco for various sewer, water, and park maintenance projects.

There are 6 recorded archaeological resources within 1 mi. of the study area. The nearest resource to the study area is a precontact site (45PC1), approximately 240 m northwest of the study area. The remaining 5 resources are all historic-period and include aboveground structures that were recorded during pedestrian surveys (see Table 3).

Site 45PC1 is the location of a reported Chinook village and cemetery extending out to the tide flats. It is recorded in DAHP's database, WISAARD, as a point, not a formal site boundary (Figure 17). The site was recorded in 1948 and at the time was in poor condition (Hudziak and Smith 1948). No follow up work has been done in the area. The original site form notes that, "Graves were on a spit of land sticking out into the tide flats upon which the village rested." Two informants were consulted for the archaeological investigation in the 1940s, a local drugstore owner, Reese Williams, and EJ Patana, the owner of the property.

Table 2. Previous Archaeological Studies Within 1 Mi. of the Study Area.

NADP #	Distance	Citation	Fieldwork Method	Resources Documented?
1696326	75 m	Hulse and Smits 2022	Monitoring	No
1684344	80 m	Freed 2013	Pedestrian Survey	No
1682127	0.2 mi.	Freed 2012	Pedestrian Survey, Shovel Probe, and Geotechnical Test Pits	No
1689189	0.2 mi.	Gall 2016	Pedestrian Survey and Shovel Tests	No
1354036	0.3 mi.	Whitlam 2010	Pedestrian Survey and Shovel Probes	No
1684537	0.4 mi.	Tisdale 2013	Monitoring	Yes
1682774	0.4 mi.	Freed 2012	Pedestrian Survey	No
1681947	0.5 mi.	Freed 2011	Pedestrian Survey	No
1342076	0.7 mi.	Smith and Fagan 2003	Pedestrian Survey and Shovel Probes	Yes
1683814	0.9 mi.	Willis et al. 2013	Pedestrian Survey and Shovel Probes	Yes
1352781	1.0 mi.	Wilson 2009	Pedestrian Survey and Shovel Probes	No

Table 3. Archaeological Resources Within 1 Mi. of the Study Area.

Resource #	Distance	Resource Type	Description	Eligibility
45PC1	240 m	Precontact Site	Permanent Village and Cemetery	Unevaluated
45PC223	0.3 mi.	Historic Site	Railroad	Unevaluated
45PC113	0.7 mi.	Historic Site	Road	Unevaluated
45PC114	0.8 mi.	Historic Site	Structures	Unevaluated
45PC147	0.9 mi.	Historic Site	Cemetery	Unevaluated
45PC2	1.0 mi.	Precontact Site	Temporary Fishing Site	Unevaluated



Figure 17. Aerial map showing the proximity of site 45PC1 to the proposed projects.

Hudziak and Smith described the site as largely underneath the town of Ilwaco, with the rear portion extending up into an area of old growth timber (presumed to be west of present-day 2nd Avenue SW). They described the sediments as “black earth” up to 45 centimeters (cm) thick overlying bedrock at the “top of the hill” and gray clay at lower elevations (i.e., the tidal flats). The only material collected was a broken canoe anchor, which was reportedly in the possession of the landowner. The site had been looted during the previous 50 years, according to the informants. The landowner claimed that the burial of “Chief Ilwaco” was located near to the existing house on the property. This is likely in reference to “Elwahko Jim,” for whom the town was named, but could be his father-in-law, Chief Concomly. Other townspeople disputed the claim at the time and indicated the Chief was buried at Willapa Bay, while concurring that the Patana property was the known site of a precontact burial ground.

In an article for the Clatsop County Historical Society, researcher Catherine Carlson wrote, “When Chief Concomly passed away, the members of the Chinook Tribe put him in his canoe, and put it on stilts with his belongings to take with him to the other side. Six years after the death of the chief, Dr. Meredith Gairdner of the Hudson’s Bay Company went to the burial site and took the skull. It was sent to a museum in England. The skull was returned to the Chinook Nation in 1972 and was placed in a sacred and secret place where no one could find it (Carlson 2004:28).

Aside from the use of site 45PC1 as a Chinookan village site and potential burial location, the area centered at Main and 2nd streets was the site of a cemetery for the old Ilwaco Episcopalian Church, which was active during the 1890s. It is noted in the site form that other denominations may have used the church over the years (Hudziak and Smith 1948).

Archaeological Expectations

The proximity of site 45PC1 to the current study area makes the potential for cultural resources and precontact burials moderate to high in the vicinity of the current study area, even though the currently proposed work will occur in a heavily developed marina environment and in dredge materials and fill. Additionally, the study area is separated physically from site 45PC1 by several streets that were added to the Port property in the 1970s (USGS 1974, 1977). No information has been identified regarding the uncovering of additional resources or burials associated with this village site in the years after Hudziak and Smith’s work in 1948, during ground-disturbing or construction work at the Ilwaco waterfront. However, ground disturbance in the study area should be conducted with extreme caution due to the proximity of site 45PC1 and the potential for precontact artifacts, objects of cultural patrimony, and/or human remains.

Additionally, it is worth noting that Baker Bay and the Ilwaco Channel have multiple reported shipwrecks and historic artifacts have been identified in dredge material south of the study area

(Reinicke and Mengers 2021; Taylor et al. 2019). There is moderate potential that cultural material, likely historic period artifacts, may be intermixed in dredge deposits along the shoreline in the study area.

Archaeological Field Methods

WillametteCRA completed a field reconnaissance of the study area. A walk-over was conducted across the margins of the marina, with attention paid to areas of exposed earth, including the graded area east of Outer Harbor Way SE and the existing dredge placement area southeast of the Ilwaco Boat Launch and Fuel Dock (see Figures 5 and 6). The WillametteCRA archaeologist took overview photographs and notes on the landform. No archaeological resources were identified.

Field Reconnaissance

WillametteCRA archaeologist Breanne Taylor, M.A., conducted a field reconnaissance of the study area on April 27, 2022. Given that most of the study area is heavily developed as a marina and/or paved, it was not possible to conduct a systematic survey. Therefore, archaeological efforts consisted simply of reconnaissance level investigation aimed at examining exposed ground surfaces and current conditions, as well as an overview of the existing East Bulkhead proposed for replacement and the shoreline between the bulkhead and the west pier (see Figures 3 and 4). Ms. Taylor examined the top and profile of the large dredge piles that are present in the southeast portion of the study area (see Figure 2, 4, and 5). No archaeological resources were identified during this phase of reconnaissance. It was determined during this field visit that the East Bulkhead warranted a formal state-level inventory and would be documented on an HPI form.

Aboveground Inventory

On June 10, 2022, WillametteCRA architectural historian Adam Alsobrook conducted a site visit to the POI to formally document and assess the East Bulkhead. Mr. Alsobrook took measurements, photographs, and notes on the bulkhead feature, and assessed its condition and NRHP eligibility. The findings of his inventory work are presented in an HPI form attached to this report as an Appendix.

The POI East Bulkhead was constructed between 1959 and 1968 and, although it meets the age threshold for listing on the NRHP, the bulkhead is in a severe state of deterioration and lacks integrity of design, materials, and workmanship. Due to this loss of integrity, the feature does not convey any potential historical significance under Criterion A, the association with historic events or patterns of history. No historically significant people were found to have been associated with the bulkhead, and therefore it is not eligible for listing under Criterion B of the NRHP. The bulkhead is an indistinct example of a maritime utility structure and is not the work of a master engineer or designer. It does not possess high artistic value and is therefore not eligible under Criterion C. It is unlikely to yield information important to history or prehistory and is therefore recommended ineligible under Criterion D of the NRHP.

The Safe Coast Seafoods building complex was not documented and assessed as part of the WillametteCRA aboveground inventory of June 10, 2022. The Safe Coast Seafoods building complex is located west of the POI East Bulkhead. An asphalt paved vehicular driveway separates the building complex from the bulkhead. This building complex formerly housed the Pioneer Packing Company cannery, which became Jessie's Ilwaco Fish Company in 1961. The Safe Coast Seafoods building complex meets the minimum age criteria for listing on the NRHP and may have historical significance under NRHP Criterion A due to its association with Ilwaco's fishing and canning industry. However, publicly available historic photographs of the building complex indicate that it has been extensively altered since the early 1970s. These alterations

include the replacement of the horizontal wood siding with a mixture of painted metal siding and painted T1-11 plywood, the removal of numerous window and door openings, and the addition of mechanical cooling equipment and piping at the roof level. Due to these numerous alterations, the WillametteCRA architectural historian recommends that the Safe Coast Seafoods building complex is not eligible for listing on the NRHP due to the extensive loss of integrity.

A linear group of commercial buildings and structures are arranged along the waterfront north of the marina and are bounded by Howerton Avenue to the north and Waterfront Way to the south. These commercial buildings and structures are located to the northeast of the POI East Bulkhead but were not documented or assessed as part of the WillametteCRA aboveground inventory of June 10, 2022. The WillametteCRA architectural historian reviewed the available project plans for the POI East Bulkhead replacement. These plans indicated that the group of commercial buildings and structures are located outside of the project area for the replacement of the POI East Bulkhead and will not be directly impacted by the proposed replacement of the bulkhead. Additionally, the proposed project is generally at ground level and horizontal in nature. The grade of the vehicular driveway will be raised by approximately 3 ft., and the replacement bulkhead and slope protection will be constructed using materials commonly used in marine environments such as the POI marina. Due to the extremely low likelihood of the project introducing visual elements detrimental to the nearby group of buildings and structures, the WillametteCRA architectural historian decided that a survey of buildings and structures outside the immediate project area was not warranted at this time.

Conclusions and Recommendations

WillametteCRA has completed a cultural resources investigation of the POI for the replacement of the East Bulkhead replacement and the Ilwaco Marina dredging and dredge material placement projects. Our investigation included a review of records on file with Oregon SHPO and Washington DAHP; historic map and archival research; and field investigations (reconnaissance level). The POI has not been subject to previous archaeological investigations and there are no known archaeological resources within the current study area. Prior to the development of Howerton Avenue and Waterfront Way in the 1970s, the area was continually reshaped by the shifting sand shoals of the Columbia River. The Ilwaco waterfront experienced substantial modification during the latter part of the twentieth century through dredging and infill. No archaeological resources were identified during the current investigation.

The nearest previously identified archaeological resource is a reported precontact village and burial site, 45PC1, which was recorded in 1948 and is consistent with the ethnohistoric accounts of *wittcutk*, a seasonal Chinookan village. Translated to, “road coming down” or ‘where the trail comes out’ (Salishan), ethnographer Edward Curtis noted that the village held 15 houses in 1850 (Curtis 1911; Silverstein 1990:534; Zenk et al. 2016:7–8). In 1948, archaeologists documented the site location based on informant accounts and a broken canoe anchor was the only cultural material collected at that time. No follow-up work has been completed (Hudziak and Smith 1948). The center point of the site was recorded only 240 m northwest of the current study area, centered around the intersection of 2nd Avenue SW and Main Street SE.

Due to the presence of nearby 45PC1, a reported Chinookan village and cemetery site proximal to the current projects, WillametteCRA recommends the preparation of an Inadvertent Discovery Plan (IDP) prior to ground-disturbing work for both the East Bulkhead and Ilwaco Marina dredging projects. The IDP will inform contractors on cultural resources and guide them on protocols to follow should archaeological remains be encountered. These recommendations apply to the current study area. Should the proposed work or study area change, these recommendations may not apply, and additional fieldwork may be necessary.

During the cultural resources assessment of the study area, WillametteCRA’s architectural historian documented the East Bulkhead and completed an HPI form for the Washington DAHP (Appendix). The bulkhead was constructed circa 1959 to 1968. The creosote-treated timber pile, lagging, and waler construction is typical of other marine bulkheads in the region. The bulkhead is severely deteriorated overall, and a large portion of the structure has failed and shifted out of plumb. It is the opinion of WillametteCRA that the East Bulkhead does not meet the criteria for NRHP eligibility as the structure does not maintain sufficient integrity to convey its historical significance. Although there are structures more than 50 years old in the viewshed of the proposed East Bulkhead replacement project, it is the professional opinion of WillametteCRA that the project as currently defined will not create significant visual impacts.

Additionally, the Safe Coast Seafoods building complex does not appear to meet the criteria for NRHP eligibility as it does not appear to maintain sufficient integrity to convey its historical significance. Finally, the group of commercial buildings and structures to the northeast of the POI East Bulkhead were not evaluated for NRHP eligibility due to the reasons identified in the previous section on the aboveground inventory.

Should unanticipated archaeological or historical resources be encountered during future activities at this location, all ground-disturbing activity in the vicinity of the find should be halted and the MARAD notified immediately. If Native American ancestral remains, funerary objects, sacred objects, and objects of cultural patrimony are discovered during the proposed work, they will be treated with respect, secured, and protected until such time as the appropriate action had been determined. All activity that may cause further disturbance to those remains must cease and the area of the find must be secured and protected from further disturbance and exposure to rain, wind, etc. The remains should not be touched, moved, or further disturbed.

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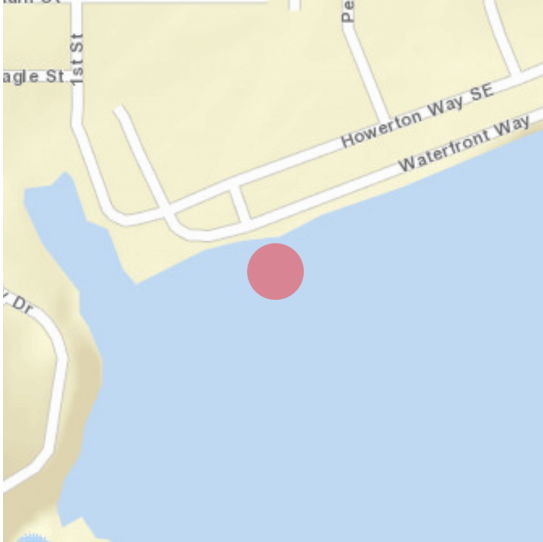
**Appendix:
HPI Form**

Historic Property Report

Resource Name: Port of Ilwaco Wharf East Bulkhead

Property ID: 728160

Location



Address: 113 Howerton Way SE, Ilwaco, Washington, 98624
Tax No/Parcel No: 73031013000
Geographic Areas: Pacific County, T10R11W33, CAPE DISAPPOINTMENT Quadrangle

Information

Number of stories: N/A

Construction Dates:

Construction Type	Year	Circa
Built Date	1959	<input checked="" type="checkbox"/>
Built Date	1968	<input checked="" type="checkbox"/>

Historic Use:

Category	Subcategory

Historic Context:

Category
Maritime

Architect/Engineer:

Category	Name or Company



Historic Property Report

Resource Name: Port of Ilwaco Wharf East Bulkhead

Property ID: 728160

Thematics:

Local Registers and Districts

Name	Date Listed	Notes
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Project History

Project Number, Organization, Project Name	Resource Inventory	SHPO Determination	SHPO Determined By, Determined Date
2022-06-04226, , Port of Ilwaco	6/10/2022	Survey/Inventory	

Photos



2022.06.10_Port of Ilwaco_41.jpg



2022.06.10_Port of Ilwaco_74.jpg



2022.06.10_Port of Ilwaco_42.jpg



2022.06.10_Port of Ilwaco_28.jpg



2022.06.10_Port of Ilwaco_25.jpg



2022.06.10_Port of Ilwaco_08.jpg



Historic Property Report

Resource Name: Port of Ilwaco Wharf East Bulkhead

Property ID: 728160

Inventory Details - 6/10/2022

Common name:

Date recorded: 6/10/2022

Field Recorder: Adam Alsobrook

Field Site number:

SHPO Determination

Detail Information

Surveyor Opinion

Significance narrative: Minimum Age Threshold: The Port of Ilwaco Wharf East Bulkhead (East Bulkhead) was constructed circa 1959 to 1968 and therefore meets the minimum age threshold for listing in the National Register of Historic Places (NRHP).

Integrity: The creosote-treated timber pile, lagging, and waler construction of the East Bulkhead is typical of other marine bulkheads in the region. The bulkhead is severely deteriorated overall, and a large portion of the structure has failed and shifted out of plumb. The East Bulkhead maintains integrity of location, setting, feeling, and association, but it has severely diminished integrity of design, materials, and workmanship.

Criterion A: The East Bulkhead is potentially eligible under NRHP Criterion A for its potential associations with the history of the development of the Port of Ilwaco between 1930 and 1972. However, based on the substantial amount of integrity loss, the East Bulkhead does not possess sufficient integrity to convey any potential historical significance under Criterion A.

Criterion B: Research did not reveal any historically significant individuals associated with the East Bulkhead. Therefore, it is recommended that the East Bulkhead is not eligible for listing in the NRHP under Criterion B.

Criterion C: The East Bulkhead is an indistinct example of a maritime utility structure that is not the work of a master engineer, is not a significant or distinguished entity representative of its type, and which does not possess high artistic values. Therefore, it is recommended that the East Bulkhead is not eligible for listing in the NRHP under Criterion C.

Criterion D: The East Bulkhead is unlikely to yield information important in history or prehistory. Therefore, it is recommended that the East Bulkhead is not eligible for listing in the NRHP under Criterion D.

Summary: It is recommended that the East Bulkhead is not eligible for listing in the NRHP.

Physical description: Early Development of the Port of Ilwaco and the Mooring Basin

Lewis Alfred Loomis, an early European American settler of the Long Beach peninsula, was instrumental in developing the earliest vessel docking facilities at Ilwaco. Lewis and



Historic Property Report

Resource Name: Port of Ilwaco Wharf East Bulkhead

Property ID: 728160

his brother Edwin raised sheep on their land claim, which was located in the vicinity of present-day Lake Loomis State Park. To address his need for a wharf to handle his outgoing wool, Lewis Alfred Loomis incorporated the Ilwaco Wharf Company in July 1874 (The Oregonian 1913; Williams 1924:55). In 1881, the 450-foot-long wharf was lengthened to 600 feet to reach deeper water farther from shore. The wharf was also widened by ten feet (The Morning Astorian 1881a, 1881b).

By 1901, U.S. Coast and Geodetic Survey maps show the formal plat of Ilwaco (USC&GS 1901). At this time, the original shoreline was still more than a hundred meters north of the boundary of the current study area, and two piers had been built out into Baker Bay within the project bounds. The pier along the west boundary of the current study area was the Ilwaco Wharf Company's pier of 1874-1881, which connected the IR&NC line from the Long Beach Peninsula to a landing approximately 2500 feet into the Bay. The 1901 map also shows another parallel pier approximately 300 feet east of the IR&NC pier. This east pier extended approximately 700 feet into Baker Bay. The 1901 map also depicts the Ilwaco Landing at Robert Gray Drive, just west of the current project bounds. The IR&NC pier and the present-day Ilwaco Landing served as the terminus for trains and steamboats in the region up until 1908 (McDonald 1989:21).

In the late 19th and early 20th centuries, silt buildup in Baker Bay emerged as a threat to the viability of Ilwaco as a port for deep draft vessels (Ott 2010). In 1889, mariners and river pilots noted that Sand Island had shifted to the north by about two miles since about 1869. The movement of Sand Island caused Baker Bay to fill with silt, and the pilots grew concerned that Ilwaco would soon be inaccessible by ship (North Pacific History Company 1889:103). The first major dredging project in Baker Bay occurred in 1913, when a channel was established between Ilwaco and the western tip of Sand Island (The Oregon Daily Journal 1913).

By 1929, the section of the IR&NC pier between the Ilwaco Mill & Lumber Company and the former IR&NC freight dock and car barn on a platform over Baker Bay had been removed (Sanborn 1909, 1929). By that same year, the pier east of the IR&NC pier had become home to the Pioneer Packing Company Clam & Fish Cannery (Sanborn 1909, 1929). The pier was about 20 feet wide and originated at a point approximately 250 feet east of the present-day intersection of Eagle Street SW and First Avenue S and extended approximately 600 feet out to the platform that supported the cannery buildings. This platform measured approximately 100 feet by 250 feet, with the long axis of the platform roughly aligned in a south-southeast/north-northwest direction. The east pier extended approximately 500 to 600 feet beyond the Pioneer Packing Company platform and then turned ninety degrees westward and connected with the platform supporting the J.P. McGowan & Sons Fish Cannery. Overall, the east pier extended approximately 1400 feet into Baker Bay (Sanborn 1929).

In 1911, Washington State passed the Port District Act which made ports public. This laid the groundwork for the formation of the Port of Ilwaco and funding for its dredging and improvement projects, including the construction of a publicly accessible dock. In 1928 voters approved the development plans for the Port of Ilwaco and two years later the Port was opened (The Oregonian 1930; Ott 2010). The newly created port soon received federal assistance in making navigation improvements, and in 1932, the United States Army Corps of Engineers approved a plan to construct a new 200-foot-wide, 10-foot-deep channel north of Sand Island (The Oregonian 1932, 1938; USC&GS 1948). However, this channel was not officially completed until 1938 (The Oregonian 1938; USC&GS 1948).



Historic Property Report

Resource Name: Port of Ilwaco Wharf East Bulkhead

Property ID: 728160

Development of the Port of Ilwaco Mooring Basin

Plans for new port facilities at Ilwaco were first announced in November 1946 (The Oregonian 1946). The project plans included a mooring basin and breakwater to accommodate more fishing fleets and improve storm protection. The Port could house up to 50 fishing boats in 1946, and the proposed project included mooring space for 300 additional boats (The Oregonian 1946; Port of Ilwaco 1946). The mooring basin and channel were to be dredged to a depth of 15 ft. Dredging maintenance would be completed annually with the spoils deposited in an area southeast of the breakwater (Port of Ilwaco 1946).

Construction on the mooring basin did not begin until 1957 (The Oregonian 1957a, 1957b; USGS 1956). The original shoreline was still present in 1950 and marked on a Metsker Atlas of Pacific County as, "First Rate Tidelands" (Metsker Maps 1950). At this time, the shoreline was located north of the project area, just south of Lake Street SE and Main Street SE. Dredge spoils were placed at the waterfront edge, thus beginning the infill of lots along present-day Howerton Avenue and Waterfront Way (Ott 2010). The 1946 mooring basin plans called for the construction of a timber pile and stone bulkhead along the north boundary of the mooring basin, which coincides with the north extent of the current project area. However, it appears that this bulkhead was not constructed as planned (USGS 1971).

The new 500-boat mooring basin was dedicated in 1959 (The Oregonian 1959). The 1959 nautical chart for Baker Bay shows the breakwater and approximate areas covered by dredge spoils to the north of the mooring basin (USGS 1956). The present-day shoreline along the north extent of the current project area is situated approximately 500 to 600 feet out from the original shoreline. This area was continually infilled and built upon with several roads, including Howerton Avenue and Waterfront Way during the 1970s, and this transition is shown on topographical maps from the mid-century (USGS 1949, 1951, 1955, 1957, 1963, 1974, 1977, 1980).

The new mooring basin proved extremely popular and in May 1961 plans were announced to expand the moorage to accommodate 300 more boats (The Oregonian 1961). These plans were scaled back slightly, and in October 1962, the Port of Ilwaco applied for a permit to dredge the mud banks within the moorage breakwater and build berths for an additional 180 boats (The Oregonian 1962).

In March 1965, the United States Army Corps of Engineers announced plans to construct a new breakwater across the Holman waterway west and south of the mooring basin. Plans included cutting off the existing pier (formerly the home of the Pioneer Packing Company cannery) to accommodate the new breakwater, which would also create moorage space for additional boats (The Oregonian 1965). Aerial photographs indicate that this work was underway by 1971 (USGS 1969, 1971).

Construction of the Port of Ilwaco Wharf East Bulkhead

By 1968, the filling in of the former tidelands made the former Pioneer Packing Company cannery platform into a peninsula at the northwest corner of the mooring basin (USC&GS 1968; USGS 1969). The former Pioneer Packing Company cannery became Jessie's Ilwaco Fish Company in 1961, and the property is now home to Safe Coast Seafoods. The original footprint of the platform supporting the Pioneer Packing Company building was



Historic Property Report

Resource Name: Port of Ilwaco Wharf East Bulkhead

Property ID: 728160

approximately 100 feet by 250 feet in size, with the long axis of the platform roughly aligned in a south-southeast/north-northwest direction. A 1956 aerial photograph shows the original narrower platform, which was expanded to the east by 1968 to create a vehicular driveway (USC&GS 1968; USGS 1956, 1969). By 1974, the overall configuration of the current Safe Coast Seafoods facility was largely complete and similar to the conditions found today (USGS 1974).

The east bulkhead runs 168 feet along the east edge of the vehicular driveway located east of the Safe Coast Seafood buildings. The middle of the structure bulges outward by approximately two to three feet. The east bulkhead is built of 118 creosote treated timber piles. These piles vary from approximately 12 inches to 16 inches in diameter. Of the 118 piles, the upper portions of 18 piles are broken off or missing, and the tops of an additional 26 piles are severely deteriorated. In addition to the deteriorated piles, about one-third of the piles appear to be relatively recent replacements, based on the lack of wood deterioration, creosote seepage, and lack of biological growth on the surfaces of the piles. Horizontal creosote treated timber lagging is mounted on the inboard side of the bulkhead to retain the stone and earth fill material. Creosote treated timber walers are mounted on the outboard face of the bulkhead and are secured to the structure with wire strand cables. Three galvanized steel piles are mounted outboard of the walers to fend off docked vessels.

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1854 Navigation Chart to the Entrance to Columbia River. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=cp416c>, accessed June 22, 2022.

1870 Chart for the Columbia River, Sheet No. 1. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=CP1130C>, accessed June 22, 2022.

1874 Columbia River Sheet #1. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=640-00-1874>, accessed June 22, 2022.

1901 Columbia River Sheet #1. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=6140-9-1901>, accessed June 22, 2022.

1948 Columbia River: Pacific Ocean to Harrington Point. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=6151-9-1948>, accessed June 22, 2022.

1968 Columbia River: Pacific Ocean to Harrington Point. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=6151-3-1968>, accessed June 22, 2022.

1975 Columbia River: Pacific Ocean to Harrington Point. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=18521-4-1975>, accessed June 22, 2022.

1976 Columbia River: Pacific Ocean to Harrington Point. Electronic document, <https://www.historicalcharts.noaa.gov/image.php?filename=18521-3-1976>, accessed June 22, 2022.

United States Geological Survey (USGS)

1938 Cape Disappointment, Washington. 30-minute topographic map.

1949 Cape Disappointment, Washington. 7.5-minute topographic map.

1951 Copalis Beach, Washington. 1x2-degree topographic map.

1955 (edition) Cape Disappointment, Washington. 7.5-minute topographic map.

1956 Aerial photograph, ARA550700010008, 9 April. Electronic resource, <https://earthexplorer.usgs.gov/>, accessed June 29, 2022.

1957 Copalis Beach, Washington. 1x2-degree topographic map.



Historic Property Report

Resource Name: Port of Ilwaco Wharf East Bulkhead

Property ID: 728160

1963 Copalis Beach, Washington. 1x2-degree topographic map.
1969 Aerial photograph, AR6100000103096, 16 July. Electronic resource, <https://earthexplorer.usgs.gov/>, accessed June 29, 2022.
1971 Aerial photograph, AR6184003904822, 19 September. Electronic resource, <https://earthexplorer.usgs.gov/>, accessed June 29, 2022.
1974 Aerial photograph, AR6283001400203, 13 July. Electronic resource, <https://earthexplorer.usgs.gov/>, accessed June 29, 2022.
1974 (edition) Cape Disappointment, Washington. 7.5-minute topographic map.
1977 (edition) Cape Disappointment, Washington. 7.5-minute topographic map.
1980 Ilwaco, Washington. 60-minute topographic map.

Williams, Lewis R.

1924 Chinook by the Sea. Kilham Stationery and Printing Company, Portland, Oregon.
Electronic resource, <https://books.google.com/>, accessed June 2022.

No Comments Received from Tribes



From: [Schwertner, Margaret](#)
To: [Sutherland, Adam CTR \(MARAD\)](#)
Cc: maredburn@portofilwaco.org; [England, Victoria](#); [John Demase](#)
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106
Date: Tuesday, April 4, 2023 5:23:00 PM

Hi Adam,

Just wanted to follow up with you on Section 106.

- The Port and M&N sent out reminder emails to the 3 tribes. You have copies of all of these. We'll let you know if we receive any further comments.
- So far, we have only received comments from DAHP (you have a copy of the DAHP letter) and the Port is working to get the historic buildings/cultural resources expert back out to the site to respond to DAHP's. This revision to the APE will also be required for the state review process (SEPA).

We will keep you posted on how the above progresses over the next month or so. Please let us know if you have any questions.

Regards,
Margaret

From: Schwertner, Margaret
Sent: Wednesday, March 15, 2023 6:08 AM
To: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>; John Demase <jdemase@portofilwaco.org>
Cc: maredburn@portofilwaco.org; England, Victoria <vengland@moffattnichol.com>
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

Hi Adam,

We have a check in call today and will be discussing any received letters/emails. So far, Mari-anna has not received any, but we will be following up with John.

We will also be discussing the send out of the reminder email.

Will follow up later today.

Regards,
Margaret

From: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>
Sent: Wednesday, March 15, 2023 5:04 AM
To: John Demase <jdemase@portofilwaco.org>
Cc: Schwertner, Margaret <mschwertner@moffattnichol.com>
Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

CAUTION: This email originated from outside of the organization.

Hello,

I wanted to send a quick follow-up to the below email to see if you have had a chance to send follow-up emails to the tribes and/or have heard from any of them?

Thank you,

Adam Sutherland

From: Sutherland, Adam CTR (MARAD)

Sent: Monday, March 6, 2023 8:24 AM

To: John Demase <jdemase@portofilwaco.org>

Cc: mschwertner@moffattnichol.com

Subject: RE: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

Hello John and Margaret,

I wanted to send a quick email to see if you have received any replies from tribes regarding this project? To my knowledge, MARAD has not received anything at this point and the 30-day window for response would have ended last Friday (3/3).

For the tribes that have not responded, we ask that you send a follow-up email. If they have not replied within a week after this follow-up, we will consider their non-response as approval for the project to move forward.

Thank you,

Adam Sutherland

From: John Demase <jdemase@portofilwaco.org>

Sent: Wednesday, February 1, 2023 3:46 PM

To: dpenn@chehalistribe.org

Cc: Sutherland, Adam CTR (MARAD) <adam.sutherland.ctr@dot.gov>;

mschwertner@moffattnichol.com

Subject: P21 Port of Ilwaco East Bulkhead Resilience Project - Section 106

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

On behalf of the US Department of Transportation Maritime Administration (MARAD), attached is a letter of invitation for you to participate in the Section 106 process for the proposed Port of Ilwaco

East Bulkhead Resilience Project. Please let me know if you have any questions or concerns regarding this project.

John Demase
Port Manager
Port of Ilwaco
165 Howerton Way PO Box 307
Ilwaco, WA 98624
360.642.3143
360.642.3148 fax
Port of Chinook
743 Water Street P.O. Box 185
Chinook, WA 98614
360.777.8797
Cell: 360.214.0293

Letter to Confederated Tribes of the Chehalis Reservation





U.S. Department
Of Transportation
**Maritime
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 26, 2023

VIA ELECTRONIC MAIL: dpenn@chehalistribe.org

Dan Penn
Tribal Historic Preservation Officer
Confederated Tribes of the Chehalis Reservation
420 Howanut Road
Oakville, WA 98568

Subject: U.S. Department of Transportation Maritime Administration, Section 106 Initiation,
Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Resilience Project,
Port of Ilwaco, Pacific County, Washington

Dear Mr. Penn:

The U.S. Department of Transportation (DOT) Maritime Administration (MARAD) awarded funds to the Port of Ilwaco (Port) under MARAD's Fiscal Year 2021 Port Infrastructure Development Program (PIDP) for the Port of Ilwaco East Bulkhead Resilience Project (project). The project is located in Pacific County, Washington (Figure 1). The Project vicinity consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard.

In keeping with a government-to-government relationship, and in compliance with the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 300101 et seq.), and its implementing regulations, 36 CFR § 800, we invite you to participate in the Section 106 process as a consulting party. As part of the review process, we request information that identifies any resources that may hold traditional religious or cultural significance to the Confederated Tribes of the Chehalis Reservation that could be affected by the proposed work, and, if applicable, assist in developing alternatives that would avoid, minimize, or mitigate any adverse effects.

Project Description

The proposed project involves replacement of the existing east bulkhead located at a commercial fishing wharf (wharf). The eastern side of the wharf is an earth filled structure protected by a creosote-treated timber bulkhead (to be replaced). The Port's marina is located waterward of the existing bulkhead; to the north the shoreline is protected by a low timber retaining wall and large log. To the south of the wall, shoreline protection consists of riprap and concrete rubble.

The project will serve the following purposes and provide the following benefits:

- The replacement bulkhead will serve as the initial phase to increase the facility's climate change/sea level rise resiliency and will help protect wharf facilities from flooding. The bulkhead will be designed to accommodate the planned facility ground floor elevation increase in the future.
- The top of the embankment elevation to the north of the bulkhead will be raised to approximately +14 feet (mean lower low water) MLLW and the existing creosote-treated retaining wall will be replaced with riprap to improve shoreline protection. The increase to top

of bank elevation will mitigate sea level rise impacts between the bulkhead and the marina access pier to the east.

- Re-grading and re-paving of the upland area behind the bulkhead wall will facilitate positive drainage away from the Safe Coast Seafoods buildings and help protect the facilities during flood events.
- The bulkhead replacement will prevent the shoreline from failing and falling into a portion of the active marina, which would adversely impact operations.
- The replacement bulkhead will be designed to accommodate the temporary mooring of fishing vessels which will allow vessels to unload/load equipment and product and improve efficiencies at the Safe Coast Seafoods facility. Under existing conditions, the timber bulkhead is used for temporary mooring but cannot be used for loading/unloading of vessels due to its poor, unstable condition.
- The project will allow trucks to drive safely on the bulkhead-supported dockside area again, which will improve the efficiency of cargo transfer operations and improve the port's competitiveness. The adjacent roadway has been closed to vehicle access due to the poor condition of the existing bulkhead.
- The removal of creosote-treated wood from the marine environment will provide water quality benefits.

Previous Surveys

In 2022, Willamette Cultural Resources Associates, LTD (WillametteCRA) completed a Cultural Resources Assessment for Port of Ilwaco. The final report titled *Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington*, dated October 2022, is attached (Attachment A). It is important to note that the report makes reference to other independent actions that are being proposed for the marina (maintenance dredging) that are not funded by MARAD.

WillametteCRA determined the Area of Potential Effects (APE) for the East Bulkhead Resilience Project by reviewing the potential for project activities to affect any historic properties. This included a review of records on file with Oregon State Historic Preservation Office (SHPO) and Washington DAHP; historic map and archival research; and field investigations. A walk-over was conducted across the margins of the marina with attention paid to areas of exposed earth. The APE was defined as the boundary of the East Bulkhead Resilience Project (Figure 2). No archaeological resources were identified within the APE.

The nearest previously identified archaeological resource is a reported precontact village and burial site, 45PC1, which was recorded in 1948 and is consistent with the ethnohistoric accounts of *wiittcutk*, a seasonal Chinookan village. This site is located upland, approximately 0.2 miles from the APE.

During the cultural resources assessment of the study area, WillametteCRA's architectural historian documented the East Bulkhead and completed an Historic Property Inventory (HPI) form for the Washington DAHP. The bulkhead was constructed circa 1959 to 1968. The creosote-treated timber pile, lagging, and waler construction is typical of other marine bulkheads in the region. The bulkhead is severely deteriorated overall, and a large portion of the structure has failed and shifted out of plumb. It is the opinion of WillametteCRA that the East Bulkhead does not meet the criteria for National Register of Historic Places (NRHP) eligibility as the structure does not maintain sufficient integrity to convey its historical significance. Although there are structures more than 50 years old in the viewshed of the proposed East Bulkhead replacement project, it is the professional opinion of WillametteCRA that the project as currently defined will not create significant visual impacts.

The Safe Coast Seafoods building complex does not appear to meet the criteria for NRHP eligibility as it does not appear to maintain sufficient integrity to convey its historical significance. The group of commercial buildings and structures to the northeast of the East Bulkhead were not evaluated for NRHP eligibility due to the reasons identified above.

Please note that for the purposes of this project, MARAD has authorized Margaret Schwertner of Moffatt & Nichol (Seattle, Washington office; phone 253-237-5928) to consult with your Tribe on behalf of MARAD. We therefore request that you provide a copy of your response to them.

We value your assistance and look forward to consulting further if there are historic properties of religious and/or cultural significance to your Tribe that may be affected by this project. To meet project timeframes, if you would like to participate or provide information regarding this project, MARAD respectfully requests that you notify us within 30 days.

I am working remotely and ask that all communication be sent electronically. If you have additional questions or comments, please contact me and/or the consultant for the action proponent, Margaret Schwertner, at mschwertner@moffattnichol.com.

Sincerely,

Barbara Voulgaris

Barbara Voulgaris
Federal Preservation Officer
Barbara.Voulgaris@dot.gov
202.366.0866

Attachment A – Cultural Resources Assessment for Port of Ilwaco, “Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington”, dated October 2022

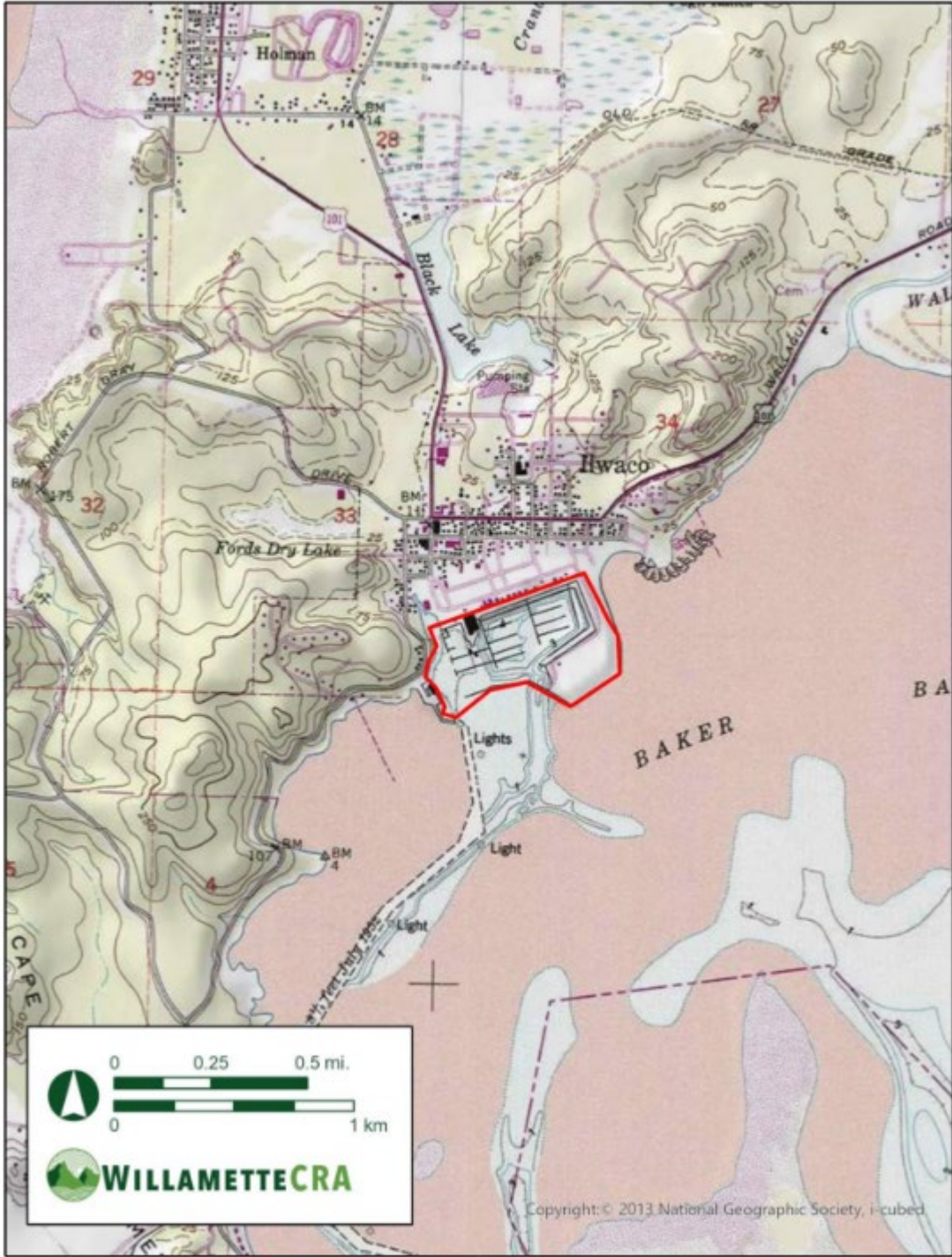


Figure 1 – Project Location (WillametteCRA 2022)



Figure 2 – Project Area of Potential Effect (WillametteCRA 2022)

Letter to Confederated Tribes of the Grand Ronde Community of Oregon





U.S. Department
Of Transportation
**Maritime
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 26, 2023

VIA ELECTRONIC MAIL: thpo@grandronde.org

David Harrelson
Program Manager and Tribal Historic Preservation Officer
Confederated Tribes of the Grand Ronde Community of Oregon
8720 Grand Ronde Road
Grand Ronde, OR 97347

Subject: U.S. Department of Transportation Maritime Administration, Section 106 Initiation,
Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Resilience Project,
Port of Ilwaco, Pacific County, Washington

Dear Mr. Harrelson:

The U.S. Department of Transportation (DOT) Maritime Administration (MARAD) awarded funds to the Port of Ilwaco (Port) under MARAD's Fiscal Year 2021 Port Infrastructure Development Program (PIDP) for the Port of Ilwaco East Bulkhead Resilience Project (project). The project is located in Pacific County, Washington (Figure 1). The Project vicinity consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard.

In keeping with a government-to-government relationship, and in compliance with the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 300101 et seq.), and its implementing regulations, 36 CFR § 800, we invite you to participate in the Section 106 process as a consulting party. As part of the review process, we request information that identifies any resources that may hold traditional religious or cultural significance to the Confederated Tribes of the Grand Ronde Community of Oregon that could be affected by the proposed work, and, if applicable, assist in developing alternatives that would avoid, minimize, or mitigate any adverse effects.

Project Description

The proposed project involves replacement of the existing east bulkhead located at a commercial fishing wharf (wharf). The eastern side of the wharf is an earth filled structure protected by a creosote-treated timber bulkhead (to be replaced). The Port's marina is located waterward of the existing bulkhead; to the north the shoreline is protected by a low timber retaining wall and large log. To the south of the wall, shoreline protection consists of riprap and concrete rubble.

The project will serve the following purposes and provide the following benefits:

- The replacement bulkhead will serve as the initial phase to increase the facility's climate change/sea level rise resiliency and will help protect wharf facilities from flooding. The bulkhead will be designed to accommodate the planned facility ground floor elevation increase in the future.
- The top of the embankment elevation to the north of the bulkhead will be raised to approximately +14 feet (mean lower low water) MLLW and the existing creosote-treated retaining wall will be replaced with riprap to improve shoreline protection. The increase to top

of bank elevation will mitigate sea level rise impacts between the bulkhead and the marina access pier to the east.

- Re-grading and re-paving of the upland area behind the bulkhead wall will facilitate positive drainage away from the Safe Coast Seafoods buildings and help protect the facilities during flood events.
- The bulkhead replacement will prevent the shoreline from failing and falling into a portion of the active marina, which would adversely impact operations.
- The replacement bulkhead will be designed to accommodate the temporary mooring of fishing vessels which will allow vessels to unload/load equipment and product and improve efficiencies at the Safe Coast Seafoods facility. Under existing conditions, the timber bulkhead is used for temporary mooring but cannot be used for loading/unloading of vessels due to its poor, unstable condition.
- The project will allow trucks to drive safely on the bulkhead-supported dockside area again, which will improve the efficiency of cargo transfer operations and improve the port's competitiveness. The adjacent roadway has been closed to vehicle access due to the poor condition of the existing bulkhead.
- The removal of creosote-treated wood from the marine environment will provide water quality benefits.

Previous Surveys

In 2022, Willamette Cultural Resources Associates, LTD (WillametteCRA) completed a Cultural Resources Assessment for Port of Ilwaco. The final report titled *Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington*, dated October 2022, is attached (Attachment A). It is important to note that the report makes reference to other independent actions that are being proposed for the marina (maintenance dredging) that are not funded by MARAD.

WillametteCRA determined the Area of Potential Effects (APE) for the East Bulkhead Resilience Project by reviewing the potential for project activities to affect any historic properties. This included a review of records on file with Oregon State Historic Preservation Office (SHPO) and Washington DAHP; historic map and archival research; and field investigations. A walk-over was conducted across the margins of the marina with attention paid to areas of exposed earth. The APE was defined as the boundary of the East Bulkhead Resilience Project (Figure 2). No archaeological resources were identified within the APE.

The nearest previously identified archaeological resource is a reported precontact village and burial site, 45PC1, which was recorded in 1948 and is consistent with the ethnohistoric accounts of *wiittcutk*, a seasonal Chinookan village. This site is located upland, approximately 0.2 miles from the APE.

During the cultural resources assessment of the study area, WillametteCRA's architectural historian documented the East Bulkhead and completed an Historic Property Inventory (HPI) form for the Washington DAHP. The bulkhead was constructed circa 1959 to 1968. The creosote-treated timber pile, lagging, and waler construction is typical of other marine bulkheads in the region. The bulkhead is severely deteriorated overall, and a large portion of the structure has failed and shifted out of plumb. It is the opinion of WillametteCRA that the East Bulkhead does not meet the criteria for National Register of Historic Places (NRHP) eligibility as the structure does not maintain sufficient integrity to convey its historical significance. Although there are structures more than 50 years old in the viewshed of the proposed East Bulkhead replacement project, it is the professional opinion of WillametteCRA that the project as currently defined will not create significant visual impacts.

The Safe Coast Seafoods building complex does not appear to meet the criteria for NRHP eligibility as it does not appear to maintain sufficient integrity to convey its historical significance. The group of commercial buildings and structures to the northeast of the East Bulkhead were not evaluated for NRHP eligibility due to the reasons identified above.

Please note that for the purposes of this project, MARAD has authorized Margaret Schwertner of Moffatt & Nichol (Seattle, Washington office; phone 253-237-5928) to consult with your Tribe on behalf of MARAD. We therefore request that you provide a copy of your response to them.

We value your assistance and look forward to consulting further if there are historic properties of religious and/or cultural significance to your Tribe that may be affected by this project. To meet project timeframes, if you would like to participate or provide information regarding this project, MARAD respectfully requests that you notify us within 30 days.

I am working remotely and ask that all communication be sent electronically. If you have additional questions or comments, please contact me and/or the consultant for the action proponent, Margaret Schwertner, at mschwertner@moffattnichol.com.

Sincerely,

Barbara Voulgaris

Barbara Voulgaris
Federal Preservation Officer
Barbara.Voulgaris@dot.gov
202.366.0866

Attachment A – Cultural Resources Assessment for Port of Ilwaco, “Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington”, dated October 2022

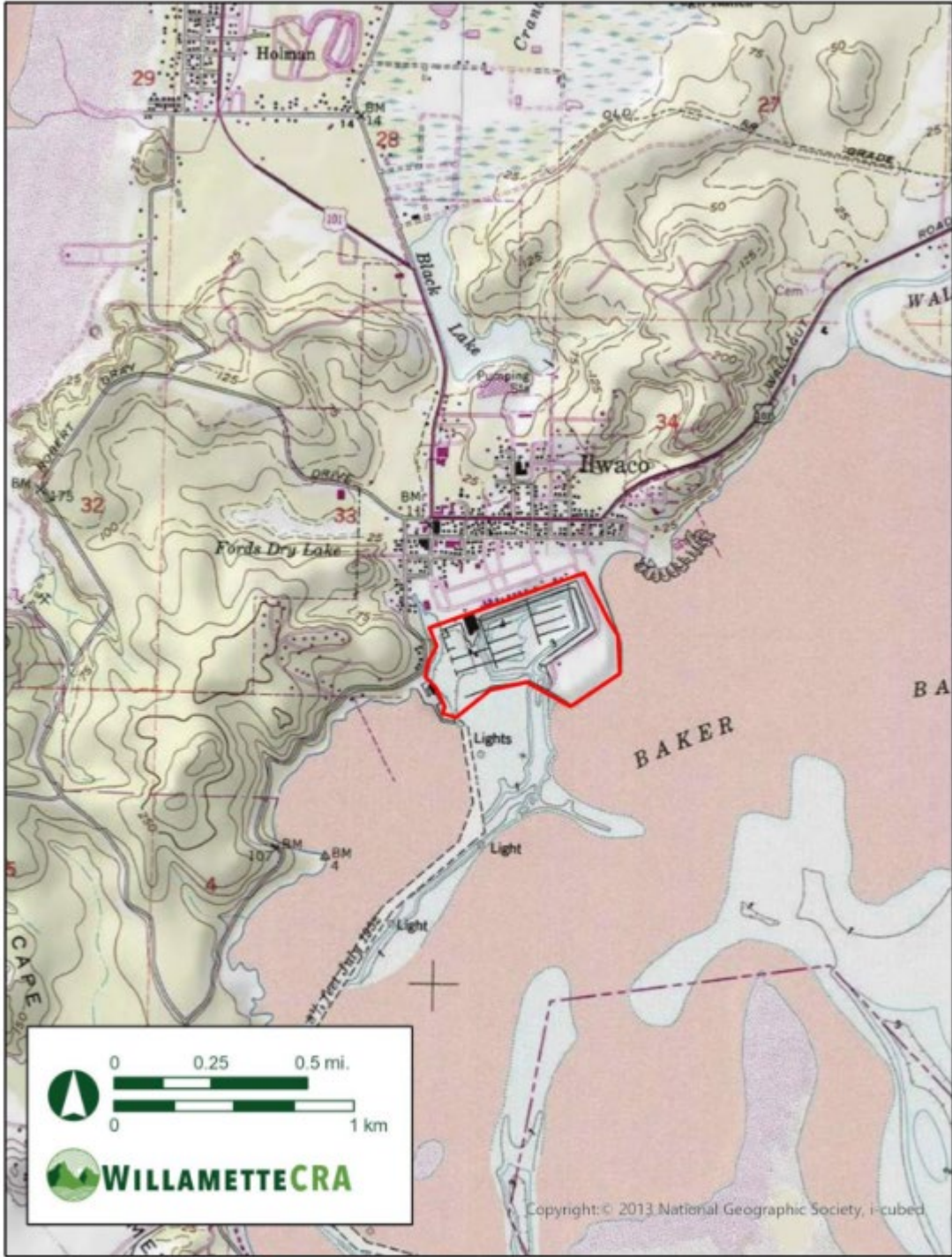


Figure 1 – Project Location (WillametteCRA 2022)



Figure 2 – Project Area of Potential Effect (WillametteCRA 2022)

Letter to Confederated Tribes of the Warm Springs Reservation of Oregon





U.S. Department
Of Transportation
**Maritime
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 26, 2023

VIA ELECTRONIC MAIL: Robert.brunoe@ctwsbnr.org

Robert Brunoe
Tribal Historic Preservation Officer
Confederated Tribes of the Warm Springs Reservation of Oregon
PO Box C
Warm Springs, OR 97761

Subject: U.S. Department of Transportation Maritime Administration, Section 106 Initiation,
Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Resilience Project,
Port of Ilwaco, Pacific County, Washington

Dear Mr. Brunoe:

The U.S. Department of Transportation (DOT) Maritime Administration (MARAD) awarded funds to the Port of Ilwaco (Port) under MARAD's Fiscal Year 2021 Port Infrastructure Development Program (PIDP) for the Port of Ilwaco East Bulkhead Resilience Project (project). The project is located in Pacific County, Washington (Figure 1). The Project vicinity consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard.

In keeping with a government-to-government relationship, and in compliance with the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 300101 et seq.), and its implementing regulations, 36 CFR § 800, we invite you to participate in the Section 106 process as a consulting party. As part of the review process, we request information that identifies any resources that may hold traditional religious or cultural significance to the Confederated Tribes of the Warm Springs Reservation of Oregon that could be affected by the proposed work, and, if applicable, assist in developing alternatives that would avoid, minimize, or mitigate any adverse effects.

Project Description

The proposed project involves replacement of the existing east bulkhead located at a commercial fishing wharf (wharf). The eastern side of the wharf is an earth filled structure protected by a creosote-treated timber bulkhead (to be replaced). The Port's marina is located waterward of the existing bulkhead; to the north the shoreline is protected by a low timber retaining wall and large log. To the south of the wall, shoreline protection consists of riprap and concrete rubble.

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- The replacement bulkhead will serve as the initial phase to increase the facility's climate change/sea level rise resiliency and will help protect wharf facilities from flooding. The bulkhead will be designed to accommodate the planned facility ground floor elevation increase in the future.
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of bank elevation will mitigate sea level rise impacts between the bulkhead and the marina access pier to the east.

- Re-grading and re-paving of the upland area behind the bulkhead wall will facilitate positive drainage away from the Safe Coast Seafoods buildings and help protect the facilities during flood events.
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- The replacement bulkhead will be designed to accommodate the temporary mooring of fishing vessels which will allow vessels to unload/load equipment and product and improve efficiencies at the Safe Coast Seafoods facility. Under existing conditions, the timber bulkhead is used for temporary mooring but cannot be used for loading/unloading of vessels due to its poor, unstable condition.
- The project will allow trucks to drive safely on the bulkhead-supported dockside area again, which will improve the efficiency of cargo transfer operations and improve the port's competitiveness. The adjacent roadway has been closed to vehicle access due to the poor condition of the existing bulkhead.
- The removal of creosote-treated wood from the marine environment will provide water quality benefits.

Previous Surveys

In 2022, Willamette Cultural Resources Associates, LTD (WillametteCRA) completed a Cultural Resources Assessment for Port of Ilwaco. The final report titled *Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington*, dated October 2022, is attached (Attachment A). It is important to note that the report makes reference to other independent actions that are being proposed for the marina (maintenance dredging) that are not funded by MARAD.

WillametteCRA determined the Area of Potential Effects (APE) for the East Bulkhead Resilience Project by reviewing the potential for project activities to affect any historic properties. This included a review of records on file with Oregon State Historic Preservation Office (SHPO) and Washington DAHP; historic map and archival research; and field investigations. A walk-over was conducted across the margins of the marina with attention paid to areas of exposed earth. The APE was defined as the boundary of the East Bulkhead Resilience Project (Figure 2). No archaeological resources were identified within the APE.

The nearest previously identified archaeological resource is a reported precontact village and burial site, 45PC1, which was recorded in 1948 and is consistent with the ethnohistoric accounts of *wiittcutk*, a seasonal Chinookan village. This site is located upland, approximately 0.2 miles from the APE.

During the cultural resources assessment of the study area, WillametteCRA's architectural historian documented the East Bulkhead and completed an Historic Property Inventory (HPI) form for the Washington DAHP. The bulkhead was constructed circa 1959 to 1968. The creosote-treated timber pile, lagging, and waler construction is typical of other marine bulkheads in the region. The bulkhead is severely deteriorated overall, and a large portion of the structure has failed and shifted out of plumb. It is the opinion of WillametteCRA that the East Bulkhead does not meet the criteria for National Register of Historic Places (NRHP) eligibility as the structure does not maintain sufficient integrity to convey its historical significance. Although there are structures more than 50 years old in the viewshed of the proposed East Bulkhead replacement project, it is the professional opinion of WillametteCRA that the project as currently defined will not create significant visual impacts.

The Safe Coast Seafoods building complex does not appear to meet the criteria for NRHP eligibility as it does not appear to maintain sufficient integrity to convey its historical significance. The group of commercial buildings and structures to the northeast of the East Bulkhead were not evaluated for NRHP eligibility due to the reasons identified above.

Please note that for the purposes of this project, MARAD has authorized Margaret Schwertner of Moffatt & Nichol (Seattle, Washington office; phone 253-237-5928) to consult with your Tribe on behalf of MARAD. We therefore request that you provide a copy of your response to them.

We value your assistance and look forward to consulting further if there are historic properties of religious and/or cultural significance to your Tribe that may be affected by this project. To meet project timeframes, if you would like to participate or provide information regarding this project, MARAD respectfully requests that you notify us within 30 days.

I am working remotely and ask that all communication be sent electronically. If you have additional questions or comments, please contact me and/or the consultant for the action proponent, Margaret Schwertner, at mschwertner@moffattnichol.com.

Sincerely,

Barbara Voulgaris

Barbara Voulgaris
Federal Preservation Officer
Barbara.Voulgaris@dot.gov
202.366.0866

Attachment A – Cultural Resources Assessment for Port of Ilwaco, “Cultural Resources Assessment for the Port of Ilwaco East Bulkhead Replacement and Dredging Projects, Pacific County, Washington”, dated October 2022

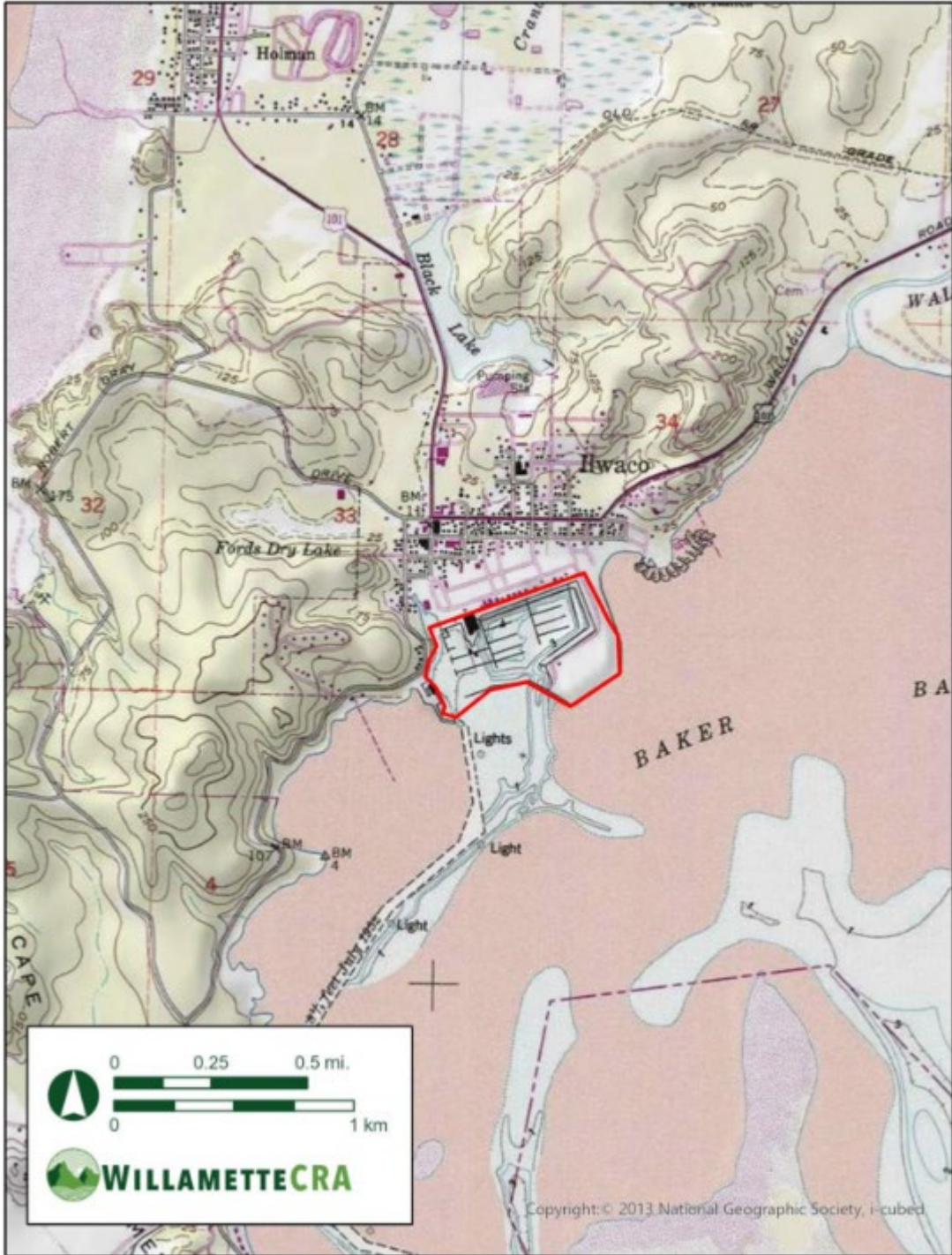


Figure 1 – Project Location (WillametteCRA 2022)



Figure 2 – Project Area of Potential Effect (WillametteCRA 2022)

Appendix I: Community Impacts



Community Impacts Analysis

Direct and Indirect Screening Tool

Project: Port of Ilwaco Bulkhead East Bulkhead Resilience Project, Repair and Rehabilitation

Document Type: NEPA SEPA

Prepared by: Marc Hamel, M&N

Port of Ilwaco Project Manager: Victoria England, M&N

The Port of Ilwaco (Port or POI), with the U.S. Department of Transportation (USDOT) Maritime Administration (MARAD), is proposing repairs and resiliency improvements at the Port’s east bulkhead, to protect existing infrastructure including the Safe Coast Seafoods facility and improve the safety, efficiency, and reliable use of the existing wharf. The Project occurs at the Port of Ilwaco on the southwest coast of Washington State, located just inside the Columbia River bar at the Pacific Ocean. The Port area generally consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard.

The proposed East Bulkhead Resilience Project (herein referred to as the Project) consists of three primary elements:

- 1) Replacing the failing creosote treated timber east bulkhead with an anchored steel sheetpile bulkhead;
- 2) Repairing slope protection north and south of the bulkhead; and,
- 3) Paving and grading the upland wharf area directly landward of the bulkhead to mitigate the effects of sea level rise.

As part of the above elements, creosote-treated timber that configures the external wall of the existing bulkhead and retaining wall will also be removed along with select derelict creosote-treated piles next to the bulkhead.

Demographics

Ilwaco, WA, Demographics								
	BG 1, CT 9505.02	Percent	Pacific County	Percent	Washington	Percent	National	Percent
Median Age	51.9		54.4		37.9		38.4	
Ave Income	56,932		54,598		82,400		69,021	
Total	233	21%	9878	14%	2,931,841	10%	124,010,992	12%
Below Poverty Level	48		1341		281,695		15,381,768	
Racial Composition								
Total	651		22,974		7,617,364		329,725,481	
White	617	95%	18,274	80%	5,063,850	66%	196,010,370	59%
Black/African American	-	0%	138	1%	283,174	4%	40,196,302	12%
American Indian/Alaska Native	1	0%	487	2%	69,496	1%	1,936,842	1%
Asian	-	0%	395	2%	675,966	9%	18,554,697	6%
Native Hawaiian/Pacific Islander	7	1%	35	0%	49,088	1%	555,712	0%
Other	-	0%	224	1%	29,227	0%	1,208,267	0%
Two or More	26	4%	1,112	5%	438,682	6%	10,456,322	3%
Hispanic/Latino	-	0%	2,309	10%	1,007,881	13%	60,806,969	18%

Direct Impacts

1. Are notable right-of-way impacts possible?

Notable right-of-way impacts include residential, institutional and/or business relocations, loss of one or more required parking spaces, major changes to property access, and similar direct property effects.

- No right-of-way needed for this project.
- No
- Yes

2. Are negative impacts to pedestrian or bicycle facilities possible?

Pedestrian and bicycle impacts include facilities that currently do not or that after completion will not meet ADA or comply with Complete Streets policies, blocked or notably delayed crossings (temporary or permanent), notably longer or indirect routes, insufficient space to share or to separate lanes, a notable increase in conflict points, and similar barrier effects or inadequate accommodations.

- Not present/Not applicable
- No
- Yes

3. Are negative impacts to transit possible?

Transit is considered to be present if a fixed route bus travels along the project corridor or if it travels along an intersecting street and crosses the project corridor. There does not need to be a stop within the project footprint. Impacts include notable delays, stop relocations, and/or increased difficulty for bus riders to reach a stop.

- Not present/Not applicable
- No
- Yes

4. Are negative impacts to local traffic on intersecting routes possible?

Local traffic impacts include closed intersections, notably longer routes to reach destinations on the other side of the project corridor, notable delays or difficulties for emergency vehicles, school buses, garbage trucks, farm equipment, etc. to cross the corridor, inadequate accommodation of vehicles making left or U turns to access local streets, and similar concerns. Adding signals, roundabouts, superstreets or medians do not, in and of themselves, notably impact local traffic, but the spacing of median openings and distances needed to make U turns may have negative impacts.

- Not present/Not applicable
- No

Yes

5. Are negative impacts to parks and recreational facilities possible?

Right-of-way impacts may be permanent or temporary, including temporary construction easements. Access impacts must substantially impair access to and use of a facility, such as during construction should lane narrowing or detours notably hinder vehicles with trailers from reaching a boat ramp. Parks and recreation facilities must be publicly owned or leased and open to the public.

Not present/Not applicable

No

Yes

The marina at the Port of Ilwaco is adjacent to the proposed Project. Construction activities may have temporary impacts to access to a small amount of the facility, but this will be coordinated prior to construction. If the current deteriorated bulkhead is allowed to remain and fails, it could have a much more direct and long-term impact on the marina.

6. Are negative impacts to farmland soils, agricultural operations or voluntary agriculture districts possible?

Right-of-way impacts may be permanent or temporary, including temporary construction easements, which convert farmland to non-farm use. Access impacts must substantially impair access to and use of an operation, such as during construction should lane narrowing, detour routes or detour bridge weight limits prevent farm vehicles from accessing fields or require low speed vehicles to use high speed roads. VADs and EVADs are not impact categories but may affect right-of-way acquisition and are noted to avoid project delay.

Not present/Not applicable

No

Yes

7. Is the project potentially inconsistent with local area land development plans, health or active transport goals, or economic development needs? Is it possible for the project to negatively impact businesses and economic resources through loss of parking, reduced visibility, notable changes in access or travel patterns, disruption of district or corridor stability and cohesion through relocations or barrier effects, or similar impacts?

Not present/Not applicable

No

Yes

8. Is it possible that the project may negatively impact community resources, or to alter the overall functioning of a district, community or neighborhood, or disrupt connections between residential and commercial, institutional, recreational and employment areas? Is it possible for the project to negatively affect emergency services access or pedestrian safety, including perceived crime concerns? Are there any known or anticipated concerns or controversies relative to the project?

- Not present/Not applicable
- No
- Yes

9. Is it possible for the project to add to recurring effects on any populations, neighborhoods or communities? Recurring effects include past, current and anticipated near term actions that may have minor impacts individually but when taken as a whole may have notable effects.

- Not present/Not applicable
- No
- Yes

10. Is it possible for the project to have a disproportionately high and adverse impact, including delay or denial of benefit, on low income, young, old, disabled or minority persons?

- Not present/Not applicable
- No
- Yes

While low-income populations are present in the DCIA (at 21% versus the county average of 14% and state average of 10%), no notably adverse community impacts are anticipated due to with this bulkhead project; thus, impacts to minority and low-income populations do not appear to be disproportionately high and adverse. Benefits and burdens resulting from the project are anticipated to be equitably distributed throughout the community. No disparate impacts are anticipated under Title VI and related statutes. There may be benefits to employment for low-income populations due to the replacement of the bulkhead, allowing the seafood companies to continue to operate safely.

Indirect Impacts

11. Is it likely that the project may result in travel patterns changes to and from the Port?

- No
- Yes

12. Will the project permanently add new connections to the existing transportation network (i.e. roadways, waterways) ?

- No
- Yes

13. Will the project provide new or expanded access to properties?

- No
- Yes

14. Will the project encourage the development of activity centers or similar areas of concentrated, moderate to high intensity land development or redevelopment?

- No
- Yes

Appendix J: Agency Coordination, Tribal Consultation, and Public Involvement



Public Notice Signage for NEPA



Photographs from Port of Ilwaco NEPA Public Notice Period; April 20, 2023 through May 19, 2023

Email Distribution List for NEPA Public Comment



POI East Bulkhead NEPA EA Email Distribution List					
List Updated: April 7, 2023					
Name (if Applicable)	Organization/Agency	Email Address	Comments	Date Email Notice Sent:	Comments Received On:
A Plumb M Daniel L Willoughby	The Watershed Company (TWC) for the City of Ilwaco staff	mdaniel@watershedco.com aplumb@watershedco.com lwiloughby-oakes@watershedco.com	All with "TWC" supporting City of Ilwaco staff with SEPA and local land use permitting	20-Apr-23	None received.
Holly Beller	City of Ilwaco	treasurer@ilwaco-wa.gov		20-Apr-23	None received.
Kinsey Friesen	United States Army Corps of Engineers Regulatory Branch (USACE)	kinsey.m.friesen@usace.army.mil		20-Apr-23	None received.
Tom Hausmann	National Marine Fisheries Service (NMFS)	tom.hausmann@noaa.gov		20-Apr-23	None received.
Mitchell Dennis	U.S. Fish and Wildlife Service (USFWS)	mitchell_dennis@fws.gov		20-Apr-23	None received.
Lauren Bauernschmidt	Washington Fish and Wildlife Department (WDFW)	lauren.bauernschmidt@dfw.wa.gov		20-Apr-23	None received.
Zachary Meyer	Washington State Department of Ecology (Ecology)	zachary.meyer@ecy.wa.gov		20-Apr-23	None received.
Sarah Burgess Justine Barton	US Environmental Protection Agency (EPA)	burgess.sarah@epa.gov barton.justine@epa.gov		20-Apr-23	None received.
	Safe Coast Seafoods	info@safecoastseafoods.com		20-Apr-23	None received.
	Freedom Market	contact@freedommarkets.com		20-Apr-23	None received.
Larry Young		skywater139@gmail.com		20-Apr-23	None received.
	Salt Hotel & Pub	adventures@salt-hotel.com		20-Apr-23	None received.
	Ilwaco View	madenaparslev@gmail.com		20-Apr-23	None received.
Dan Penn	Confederated Tribes of the Chehalis Reservation	dpenn@chehalis-tribe.org	Maintained only the closest tribe to Ilwaco on Public Notice List; did not include entire 106 list. Any others?	20-Apr-23	None received.

Email and Information for NEPA Public Comment



From: [Schwertner, Margaret](#)
To: [Gilson, Kristine \(MARAD\)](#)
Cc: [Lebo, Stephen \(MARAD\)](#); [Tracy Lofstrom](#); [England, Victoria](#); [Hamel, Marc](#)
Subject: FW: P21 POI Bulkhead NEPA Public Notice Period Follow Up
Date: Thursday, May 25, 2023 8:37:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[Notice- Port of Ilwaco - Public Input Requested.msg](#)

Hi Kris and Stephen,

Public Notice for the Ilwaco East Bulkhead Resiliency NEPA process has been completed. No comments were received (see below and attached for your files).

Regards,
Margaret

From: Tracy Lofstrom <tlofstrom@portofilwaco.org>
Sent: Thursday, May 25, 2023 8:21 AM
To: Schwertner, Margaret <mschwertner@moffattnichol.com>
Cc: England, Victoria <vengland@moffattnichol.com>
Subject: RE: P231 POI Bulkhead NEPA Public Notice Period Follow Up

CAUTION: This email originated from outside of the organization.

Margaret,

The Port of Ilwaco received no comments during the 30-day period.

Best Wishes,

Tracy Lofstrom, Manager
Port of Ilwaco
360-642-3143 ext 201
tlofstrom@portofilwaco.org

From: Schwertner, Margaret <mschwertner@moffattnichol.com>
Sent: Thursday, May 25, 2023 6:46 AM
To: Tracy Lofstrom <tlofstrom@portofilwaco.org>
Cc: England, Victoria <vengland@moffattnichol.com>
Subject: P21 POI Bulkhead NEPA Public Notice Period Follow Up

Hi Tracy,

The Port of Ilwaco's 30-day NEPA public notice period for the *East Bulkhead Resilience Project* started April 20 and ended May 19, 2023. The Port:

- Posted notification signs to the site, which included contact information and links for comment submittal
- Posted project information and a comment form to the Port website
- Emailed stakeholders about the project (see attached)

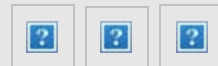
M&N wanted to verify that the Port received no public comments on the East Bulkhead project. Is this correct? Once verified we shall send the results to MARAD.

Thank you,
Margaret

Margaret Schwertner
Senior Environmental Scientist
505 S. 336th St. | Federal Way, WA 98422
P 253.237.5928 | M 206.818.2600



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From: [Mari-Anna Redburn](#)
To: mdaniel@watershedco.com; aplumb@watershedco.com; lwilloughby-oakes@watershedco.com; treasurer@ilwaco-wa.gov; kinsey.m.friesen@usace.army.mil; tom.hausmann@noaa.gov; mitchell.dennis@fws.gov; lauren.bauernschmidt@dfw.wa.gov; zachary.meyer@ecy.wa.gov; burgess.sarah@epa.gov; barton.justine@epa.gov; info@safecoastseafoods.com; contact@freedommarkets.com; skywater139@gmail.com; adventures@salt-hotel.com; madenaparsley@gmail.com; dpenn@chehalistrike.org
Cc: [Commissioner2](#); [Commissioner3](#); [Commissioner1](#); [Tracy Lofstom](#); [Schwertner, Margaret](#); [England, Victoria](#)
Subject: Notice- Port of Ilwaco - Public Input Requested
Date: Thursday, April 20, 2023 1:51:14 PM
Attachments: [20230410 POI East Bulkhead NEPA EA Public Notice Figure 1.jpg](#)
[20230410 POI East Bulkhead NEPA EA Public Notice Figure 2.jpg](#)
[20230410 POI East Bulkhead NEPA EA Public Notice Figure 3.jpg](#)
Importance: High

CAUTION: This email originated from outside of the organization.

Public Input Requested

East Bulkhead Resilience Project

Port of Ilwaco

Ilwaco, Pacific County, Washington

In conjunction with the U.S. Department of Transportation (USDOT) Maritime Administration (MARAD), the Port of Ilwaco (Port) is proposing to replace the existing east bulkhead located at a commercial fishing wharf for improved the safety, efficiency, and reliable use of the wharf. MARAD awarded funds to the Port under the Port Infrastructure Development Grants Program to complete these repairs. The use of these federal funds requires compliance with the National Environmental Policy Act (NEPA) to be provided through an Environmental Assessment (EA) process. MARAD is the lead federal agency for the NEPA EA. The purpose of this announcement is to present the proposed replacement, and ask for your comments, questions, and concerns. Note that no formal public meeting is proposed. All of your comments will be taken into consideration as the project continues.

Project Description

Replacement of the bulkhead is required for improved the safety, efficiency, and reliable use of the wharf. The project will serve the following purposes and provide the following benefits:

- The replacement bulkhead will serve to increase the facility's climate change/sea level rise resiliency and will help protect wharf facilities from flooding.
- The top of the embankment elevation to the north of the bulkhead will be raised to approximately +14 feet (mean lower low water) MLLW and the existing creosote-treated retaining wall will be replaced with riprap to improve shoreline protection. The increase of top of bank elevation will mitigate sea level rise impacts between the bulkhead and the marina access pier to the east.
- Re-grading and re-paving of the upland area behind the bulkhead wall will facilitate positive drainage away from the Safe Coast Seafoods buildings and help protect the facilities during flood events.
- The bulkhead replacement will prevent the shoreline from failing and falling into a portion of the active marina, which would adversely impact operations.
- The replacement bulkhead will be designed to accommodate the temporary mooring of fishing vessels which will allow vessels to unload/load equipment and product and improve

efficiencies at the Safe Coast Seafoods facility. Under existing conditions, the timber bulkhead is used for temporary mooring but cannot be used for loading/unloading of vessels due to its poor, unstable condition.

- The project will allow trucks to drive safely on the bulkhead-supported dockside area again, which will improve the efficiency of cargo transfer operations and improve the port's competitiveness. The adjacent roadway has been closed to vehicle access due to the poor condition of the existing bulkhead.
- The removal of creosote-treated wood from the marine environment will provide water quality benefits.

Figures 1 through 3 attached to this email provide an overview of existing conditions and project elements.

The project will undergo State Environmental Policy Act (SEPA) review, and the affiliated state public notice, with the City of Ilwaco soon. Permitting is also underway.

Why is the project needed?

The Port is a key hub for commercial fishing, seafood and aquaculture processing, and recreation activities that greatly benefit the regional economy. The commercial fishing wharf, operated by Safe Coast Seafoods, is one of the most active in the state. Repair of the bulkhead wall is critical to ongoing operations at Safe Coast Seafoods. In its current condition, the bulkhead is in a degraded structural condition and at risk of failing. Without the project, the eventual closure of the wharf will result in a cascade of negative transportation and economic impacts for the region.

Project Contact Information

If you need additional information or would like to discuss the project further, please contact the following representative: John Demase, Port Manager at the Port of Ilwaco. Questions or written comments can be directed and submitted to:

Attn: Tracy Lofstrom

Re: Port of Ilwaco East Bulkhead Resilience Project

Port of Ilwaco

165 Howerton Way PO Box 307

Ilwaco, WA 98624

Direct: 360-642-3143

tlofstrom@portofilwaco.org

Comments can also be submitted here at: <https://www.portofilwaco.com/poi-east-bulkhead-resilience-project/>

Due Date For Comments

Please submit comments by May 19, 2023.

Website Posting for NEPA Public Comment





CALL US
360-642-3143



Zoom Meeting



NAD83/WGS84 – 46° 18' 20" N – 124°
02' 21" W V.H.F. Channel 16, 69

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Public Input Requested

East Bulkhead Resilience Project Port of Ilwaco

Ilwaco, Pacific County, Washington

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Project Contact Information

If you need additional information or would like to discuss the project further, please contact the following representative: Tracy Lofstrom, Port Manager at the Port of Ilwaco. Questions or written comments can be

directed and submitted to:

Attn: Tracy Lofstrom, Port Manager

Re: Port of Ilwaco East Bulkhead Resilience Project

Port of Ilwaco

165 Howerton Way PO Box 307

Ilwaco, WA 98624

Direct: 360-642-3143

tlofstrom@portofilwaco.org

Comments can also be submitted here at: [Click Here](#)

Due Date For Comments

Please submit comments by May 19, 2023.

The footer features a blue background with a white line-art logo of a ship and the text "PORT OF ILWACO" in the top left. A "Navigation" menu is positioned in the top right, listing "Links of Interest", "Documents", "Boatyard Terms of Use", and "Privacy". Below the logo is the "Contact Address" section, which includes a location pin icon for "PO Box 307 Ilwaco, WA 98624", a phone icon for "360-642-3143", a fax icon for "360-642-3148", and a radio tower icon for "V.H.F. Channel 16, 69". A white button with a Facebook icon and the text "Visit Discover Ilwaco and Ilwaco Merchants Association" is located in the bottom right. The footer also contains copyright information "© Copyright 2022 Port of Ilwaco" and a list of links: "Site Map / Privacy Policy / Accessibility Statement | Website Designed by CI WEB GROUP". The CI WEB GROUP logo includes the tagline "TECHNOLOGY . STRATEGY . NETWORK . MINDSET".

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Appendix K: Laws, Regulations, and Permits/Approvals



Appendix K includes the following applicable federal and state laws and regulations, as well as Executive Orders and requirements for federal agency compliance for the project (See Tables K1 to K3).

The project permits and approvals (federal, state, and local) obtained to date and/or pending issuance are listed in Table K4.

Table K1. Applicable Federal Laws

Federal Law	Notes
Act for the Preservation of American Antiquities (1906) ("Antiquities Act")	eCFR: 43 CFR Part 3 -- Preservation of American Antiquities
Americans with Disabilities Act (ADA)	The ADA prohibits discrimination against people with disabilities in several areas, including employment, transportation, public accommodations, communications, and access to state and local government' programs and services.
Anadromous Fish Conservation Act, 16 U.S.C. 757, et seq.	16 U.S. Code § 757a - Anadromous, Great Lakes, and Lake Champlain fisheries U.S. Code US Law LII / Legal Information Institute (cornell.edu)
Archaeological Resources Protection Act (ARPA) of 1979	The ARPA governs the excavation of archaeological sites on Federal and Indian lands in the United States, and the removal and disposition of archaeological collections from those sites.
Civil Rights Act of 1964, Title VI, as amended	The Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs or activities that receive Federal financial assistance.
Clean Air Act of 1972 (CAA), as amended, 42 U.S.C. 7401 et seq.	The CAA regulates air emissions from stationary and mobile sources. Among other things, this law authorizes the U.S. Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare, and to regulate emissions of hazardous air pollutants. More information can be accessed at 42 U.S. Code § 7401 - Congressional findings and declaration of purpose U.S. Code US Law LII / Legal Information Institute (cornell.edu).
Clean Water Act of 1972, as amended, U.S.C. 1251 et. seq.	Compliance with current federal water quality standards, including compliance with the anticipated Section 401 Water Quality Certification permit. Maintenance work under the proposed action will be conducted in accordance with current state and federal water quality standards, including compliance with the anticipated Section 401 Water Quality Certification permit. More information can be accessed at 33 U.S. Code § 1251 - Congressional declaration of goals and policy U.S. Code US Law LII / Legal Information Institute (cornell.edu).
Coastal Barrier Improvement Act of 1990	Coastal Barrier Improvement Act of 1990 U.S. Fish & Wildlife Service (fws.gov)
Coastal Barrier Resources Act of 1982	Coastal Barrier Resources Act of 1982 U.S. Fish & Wildlife Service (fws.gov)
Coastal Zone Management Act (CZMA) of 1972, 16 U.S.C. 1451 et seq.	All federal development activities and development requiring federal permits or funding affecting land or water areas or resources within the coastal zone and subject to the Coastal Zone Management Act (CZMA) of 1972. In Washington, federal agencies or federal license or permit applicants must demonstrate consistency with Washington's Coastal Zone Management Program (WCZMP) by submitting to the Department of Ecology (Ecology) a Consistency Determination (if the proponent is a federal agency) or a Consistency Certification (if the proponent is seeking a federal license or permit). More information can be accessed at Coastal Zone Management (CZM) Federal Consistency (wa.gov)

Federal Law	Notes
Department of Transportation Act of 1966, Section 4(f)	Preserve publicly owned public parklands, recreation areas, waterfowl and wildlife refuges, and significant historic sites.
Emergency Wetlands Resources Act of 1986	To promote the conservation of wetlands in the United States to maintain the public benefits they provide.
Endangered Species Act (ESA) of 1973, 16 U.S.C. 1531 et seq.	Compliance with ESA with NOAA's National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS). Biological Evaluation (BE) or Biological Assessment (BA) and Essential Fish Habitat (EFH) Assessment for Section 7 of the ESA.
Energy Policy Act, 42 USC §13201 et seq.	The Act provides loan guarantees for entities that develop or use innovative technologies that avoid the by-production of greenhouse gases. Another provision of the Act increases the amount of biofuel that must be mixed with gasoline sold in the United States.
Estuary Protection Act of 1968	Provides a means to protect, conserve, and restore estuaries in a manner that maintains balance between the need for natural resource protection and conservation and the need to develop estuarine areas to promote national growth.
Federal-Aid Highway Act of 1970, 23 USC, Section 109	Assures that possible adverse, economic, social, and environmental effects of proposed highway projects and project locations are fully considered and that final decisions on highway projects are made in the best overall public interest.
Federal Water Project Recreation Act of 1968	Requires that recreation and fish and wildlife enhancement be given full consideration in federal water development projects.
Fish and Wildlife Coordination Act of 1934, 16 U.S.C. 661-666(c)	This act applies to any federal project where the waters of any stream or other body of water are impounded, diverted, deepened, or otherwise modified.
Superfund Amendments Reauthorization Act (SARA) of 1986	Requires OSHA to issue regulations protecting workers engaged in hazardous waste operations.
Historic Bridges, Surface Transportation and Uniform Relocation Act of 1987 Section 123(f)	Any bridge that is listed in, or eligible for listing in, the National Register of Historic Places.
Land and Water Conservation Act of 1965	All projects which impact recreational lands purchased or improved with land and water conservation funds. This Act provides funding to preserve and develop recreational lands.
Leaking Underground Storage Tanks (USTs)	A complete version of the law that governs underground storage tanks (USTs) is available in the U.S. Code, Title 42, Chapter 82, Subchapter IX. This law incorporates amendments to Subtitle I of the Solid Waste Disposal Act as well as the UST provisions of the Energy Policy Act of 2005 and gives EPA the authority to regulate USTs.
Magnuson-Stevens Fishery Conservation and Management Act (MSA) of 1976, 16 U.S.C. 1801 et seq.	Compliance with MSA with NOAA's National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS).
Marine Mammal Protection Act of 1972 (MMPA), 16 U.S.C. 1631 et seq.	The Marine Mammal Protection Act (MMPA) generally prohibits "take" of marine mammals in U.S. waters by any person and by U.S. citizens in international waters and the importing of marine mammals and marine mammal products into the United States. NOAA Fisheries can authorize take for the certain activities.
Marine Protection, Research, and Sanctuaries Act of 1972, as amended (Section 103 of MPRSA is also known as the Ocean Dumping Act or ODA), as amended, 33 U.S.C. 1413	Regulate dumping of material into United States' ocean waters.
Migratory Bird Treaty Act (MBTA) of 1918, 16 U.S.C. 703 et seq.	This law implements various treaties between the United States and Canada, Mexico, the former Soviet Union, and Japan protecting migratory birds by making it unlawful at any time, by any

Federal Law	Notes
	means or in any manner, to pursue, hunt, take, capture, or kill said species. The law applies to the removal of nests (such as swallow nests on bridges) occupied by migratory birds during the breeding season.
National Environmental Policy Act (NEPA) of 1969, as amended, 42 U.S.C. 4321 et seq.	Compliance with NEPA to meet federal grant funding award requirements under the USDOT's Port Infrastructure Development Program (PIDP).
The National Flood Insurance Act of 1968, as amended, and The Flood Disaster Protection Act of 1973, as amended, 42 U.S.C. 4001 et. seq	Identify flood-prone areas and provide insurance. Requires the purchase of insurance for buildings in special flood-hazard areas. Any federally-assisted acquisition or construction project in an area identified as having special flood hazards.
National Historic Preservation Act (NHPA) of 1966, 16 U.S.C. 470 et seq.	Compliance with Section 106 of the NHPA as part of NEPA and USACE permit.
Native American Graves Protection and Repatriation Act of 1990	Protect human remains and cultural material of Native American and Hawaiian groups.
Noise Control Act of 1972	Promulgate noise standards for highway traffic. All federally-funded projects for the construction of a highway on new location, or the physical alteration of an existing highway which significantly changes either the vertical or horizontal alignment or increases the number of through-traffic lanes.
Resource Conservation and Recovery Act (RCRA), as amended (Hazardous Waste Issues), 42 U.S.C. 6901 et seq.	This act regulates the handling of hazardous waste sites for the protection of human health and the environment.
Rivers and Harbors Act of 1970, Public Law 91-611, Section 122	Protection of navigable water in the United States.
Safe Drinking Water Act of 1974 (SDWA), as amended, 42 U.S.C. 300 et seq.	Ensure public health and welfare through safe drinking water.
Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended	These acts, collectively known as the Uniform Act, as amended, provide for uniform and equitable treatment of persons displaced from their homes, businesses, non-profit associations, or farms by federal and federally-assisted programs, and establish uniform and equitable land acquisition policies. The Act assures that such persons are treated fairly, consistently, and equitably, and so that they will not suffer disproportionate injuries.
Watershed Protection and Flood Prevention Act of 1954	Law that protects watersheds from erosion, sedimentation, and flooding.
Water Resources Development Act of 1976, Public Law 94-587, Section 150	587.pdf (house.gov)
Water Resources Development Act of 1986, Public Law 99-662, Section 906	587.pdf (house.gov)
Wetlands Mitigation Banks – ISTEIA 1991, Sections 1006-1007	To mitigate wetlands impacts directly associated with projects funded through the National Highway System and Surface Transportation Program, by participating in wetland mitigation banks, restoration, enhancement and creation of wetlands authorized under the Water Resources Development Act, and through contributions to statewide and regional efforts.
Wild and Scenic Rivers Act of 1968	Preserve and protect wild and scenic rivers and immediate environments for benefit of present and future generations. All projects which affect designated wild, scenic, and recreational rivers and immediate environment and rivers under study for inclusion into the system. The Act prohibits federal agencies from

Federal Law	Notes
	undertaking activities which would adversely affect the values for which the river was designated.
Wilderness Act of 1964	This act preserves and protects wilderness areas in their natural condition for use and enjoyment by present and future generations.

Table K2. Applicable Executive Orders and Federal Agency Compliance

Executive Order	Notes
EO 11593, Protection and Enhancement of the Cultural Environment	Instructs all federal agencies to support the preservation of cultural properties.
EO 11988, Floodplain Management	Requires federal agencies to avoid or minimize the adverse impacts of their activities on floodplains.
EO 11990, Protection of Wetlands, and DOT Order 5660.1A, Preservation of the Nation's Wetlands	EO 11990 directs federal agencies to take actions to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the values of wetlands on federal property. DOT Order 5660.1A governs MARAD's actions to assure the protection, preservation, and enhancement of the nation's wetlands to the fullest extent practicable.
EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations	Directs federal agencies to make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.
EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis	EO 13990: Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis (2021) Department of Energy
EO 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All	Directs federal agencies to build upon and strengthen the commitment to deliver environmental justice to all communities across America through an approach that is informed by scientific research, high-quality data, and meaningful federal engagement with communities with environmental justice concerns.
DOT Order 5610.1C Procedures for Considering Environmental Impacts	Procedures for Considering Environmental Impacts - DOT Order 5610.1C US Department of Transportation

Table K3. Applicable State Laws

State Law	Notes
Washington State Environmental Policy Act (SEPA)	The State Environmental Policy Act (SEPA) requires state and local governments to identify possible environmental impacts that may result from governmental decisions. The SEPA review process helps the department, applicants, and the public understand how a proposed project will affect the environment.
Hydraulic Project Approval (HPA) (RCW 77.55)	Requires those planning for hydraulic projects in or near state waters to apply for and obtain an HPA from WDFW. An HPA ensures that project construction is carried out to protect fish and their aquatic habitats.

Table K4. Consultations, Permits, and Approvals Anticipated for the Proposed Action

Consultations and Permits	Status	Location of Applicable Permits
Federal		
U.S. Army Corps of Engineers Permit	Pending issuance of NWP-2022-525.	Not yet available.
National Marine Fisheries Service (NMFS) ESA Section 7	ESA Section 7 Concurrence from NMFS for the Port of Ilwaco, East Bulkhead Resilience Project. Dated August 16, 2023; 2022-03087 and updated by email on October 5, 2023.	Appendix G
U.S. Fish and Wildlife Service (USFWS) ESA Section 7	ESA Section 7 Concurrence from USFWS for the Port of Ilwaco, East Bulkhead Resilience Project. Dated August 28, 2023; 2023-0026807 and updated by email on September 6, 2023.	Appendix G
Section 106	DAHP No Effect Letter and all DAHP and Tribal Correspondence.	Appendix H
State		
Washington Department of Fish and Wildlife (WDFW) Hydraulic Project Approval (HPA)	Permit Number 2024-6-66+01 issued February 22, 2024.	State permits/ approvals all received; available upon request.
City of Ilwaco Environmental Policy Act (SEPA)	Determination of Non-Significance (DNS) issued November 6, 2023.	
City of Ilwaco Substantial Development Permit and Conditional Use Permit	No.2024-002 issued January 9, 2024 and approved by Ecology on February 6, 2024 No. 2024-SWRO-7840.	
Washington State Department of Ecology (Ecology) supports federal compliance with Section 401 of the Clean Water Act (CWA).	Order No. 22523 (USACE Permit No. NWP-2022-525) issued February 22, 2024.	
Ecology supports federal compliance with Section 402 of the CWA.	Not required to obtain a NPDES Construction Stormwater General Permit because the total disturbed area is less than one acre.	Not applicable.
Ecology manages federal Coastal Zone Management Act Consistency Decision (CD)	CD issued February 26, 2024.	Appendix K (see below)
Local		
City Construction Permit	Application to be submitted closer to construction commencement.	Not yet available.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

February 26, 2024

Port of Ilwaco
ATTN: Tracy Lofstrom
P.O. Box 307
Ilwaco, WA 98624

Re: Coastal Zone Management Federal Consistency Decision for Port of Ilwaco East Bulkhead Resilience Project (Corps No. **NWP-2022-525**), in Baker Bay, Ilwaco, Pacific County, Washington

Dear Tracy Lofstrom:

On September 8, 2023, the Department of Ecology (Ecology) received a Certification of Consistency with the Washington State Coastal Zone Management Program (CZMP) for the above project. Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Port of Ilwaco's determination that the proposed work is consistent with Washington's CZMP.

The proposed work includes replacing a failing bulkhead with a new structure and repair slope protection north and south of the existing bulkhead. Additional work entails paving and regrading the upland wharf area directly landward of the bulkhead to mitigate projected sea level rise.

Bulkhead Replacement: The majority of the existing bulkhead will be abandoned in place but the top several feet of timber above the timber wale may be removed and localized notching of the existing bulkhead to accommodate installing new tie-back ground anchors for the new bulkhead. The new bulkhead will be constructed directly adjacent to the existing structure. New sheet pile will be driven into the substrate and drainage rock will be placed between the existing bulkhead and the new bulkhead wall to maintain water pressure equilibrium on both sides of the bulkhead. The length of the bulkhead will remain the same but will be ~3 feet higher than the existing structure to accommodate for projected sea level rise.

Slope Protection Repair: An existing creosote treated timber retaining wall located to the north of the bulkhead will be completely removed and replaced with 198 cubic yards of riprap. A layer

of fish mix rock will be placed over the riprap located below the high tide line to provide fish habitat. To the south of the existing bulkhead, 14 cubic yards of concrete rubble will be replaced with 35 cubic yards of riprap.

To mitigate for aquatic impacts the following actions will be taken:

- Removal of ~28 creosote-treated timber piles and 3 steel piles will be removed adjacent to the existing bulkhead.
- Removal of 36 derelict creosote-treated timber piles and 3 creosote-treated timber pile caps.
- Removal of a derelict structure ~ 2510 square feet in area will be removed decreasing overwater coverage.

This activity is located at 117 Howerton Ave SE, Ilwaco in Baker Bay, Pacific County, Washington.

If you have any questions regarding Ecology's decision, please contact Brook Swensen at 564-999-1749.

Your right to appeal

You have a right to appeal this decision to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal, you must do all of the following within 30 days of the date of receipt of this decision:

- File your notice of appeal and a copy of this decision with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in WAC 371-08-305 and -335. "Notice of appeal" is defined in WAC 371-08-340.
- Serve a copy of your notice of appeal and this decision on the Department of Ecology mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Filing an appeal

Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: <https://elaho.wa.gov/> or call: 360-664-9160.

Service on Ecology

Street Addresses:

Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Mailing Addresses:

Department of Ecology
Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

E-Mail Address:

ecologyappeals@ecy.wa.gov

Sincerely,



Loree' Randall, Section Manager
Aquatic Permitting & Protection Section
Shorelands and Environmental Assistance Program

Sent via e-mail: tlofstrom@portofilwaco.org

E-cc: Kinsey Friesen, U.S. Army Corps of Engineers
Victoria England, Moffat & Nichol
Brook Swensen, Ecology
fedconsistency@ecy.wa.gov