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# Quil Ceda Creek Casino Project Archaeological Monitoring and Treatment Plan

***Prepared for:***

The Tulalip Tribes  
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## **INTRODUCTION**

The purpose of this Archaeological Monitoring and Treatment Plan is to establish archaeological resources monitoring and inadvertent discovery protocols to be used during ground-disturbing construction associated with the Quil Ceda Creek Casino (QCCC) Project on the Tulalip Indian Reservation in Snohomish County, Washington. It includes sections on archaeological monitoring methods, a monitoring plan summary, and a plan for dealing with unanticipated discoveries, in addition to pertinent contact information.

## **PROJECT DESCRIPTION AND LOCATION**

The Tulalip Tribe envisions the new QCCC Project to be an exciting addition to the overall Quil Ceda development area. The project area is located in Sections 29 and 32 of Township 30 North, Range 5 East, Willamette Base and Meridian (Figure 1). The new casino will replace the existing facility on an adjacent undeveloped site. The casino project will be located on a 12-acre site to the south of the existing Quil Ceda Creek Casino (Appendix A). The current site is being occupied by the Judicial Center which is scheduled for demolition. The proposed project includes the following: construction of approximately 110,000 foot<sup>2</sup> (ft.) of casino space including but not limited to gaming floor; back of house areas; employee dining; storage; loading dock; bars and restaurants; signage; emergency generator; raised casino floor; high quality smoke evacuation system; and other amenities. This new facility is expected to have 1,250 slot machine positions, with the ability to expand to 1,500; 17 table games; and two casino bars. In addition, a casual dining restaurant, two fast food venues, a coffee shop, and an entertainment lounge will also be included in the program. The proposed project entails site development of approximately 12 to 14 acres of land including a 1,200-stall parking garage, any site utilities (possible lift station), and 700 surface parking stalls.

## **PREVIOUS CULTURAL RESOURCES INVESTIGATIONS**

ASM Affiliates, Inc. (ASM) previously conducted a cultural resources assessment associated with the current QCCC Project (Iversen and Steingraber 2016). ASM identified no cultural resources within the project area as a result of the assessment. However, ASM was unable to conduct subsurface investigations in most of the project area's western and northern portions due to existing structures, asphalt pavement, and compact gravel fill. Although the results of the investigation were negative for archaeological resources, there is still a potential for buried cultural resources within the project area based on its location near the Snohomish River Estuary and Quilceda Creek, ethnographic documentation of land use in the project vicinity including village sites along Quilceda Creek, the proximity of previously recorded archaeological sites on similar landforms, and the previous identification of a precontact isolated artifact immediately east of the project area. Cultural resources associated with historic and/or precontact utilization of the project area could be present below fill materials associated with the modern development of the parcel. Additionally, precontact cultural resources could be buried deeply within alluvial deposits in the project area based on the estimated progradation of the Snohomish River Estuary. Based on the potential for encountering archaeological resources, ASM recommended that a professional archaeologist monitor all ground-disturbing activity associated within the QCCC Project.

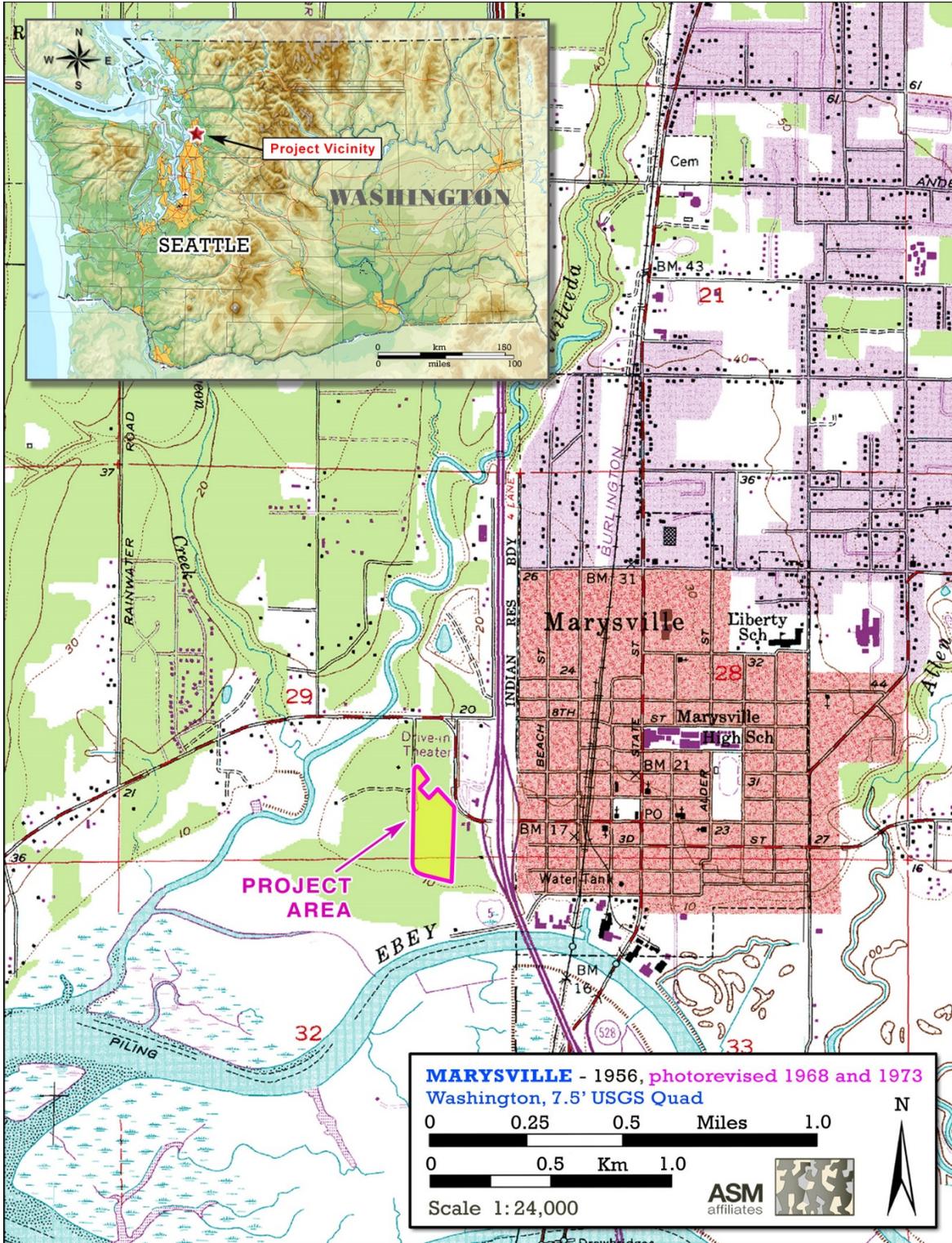


Figure 1. Quil Ceda Creek Casino project location.

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## **ARCHAEOLOGICAL MONITORING METHODS**

ASM will provide a professional archaeologist will be on site during construction excavation associated with the project. The on-site archaeological monitor will observe ground disturbances, examining excavation openings and backdirt from excavations for evidence of cultural resource materials while maintaining a safe distance from construction equipment. The monitor may request that construction activities be temporarily halted as necessary to allow photography and recovery of materials and data. Any backdirt may be screened at the discretion of the archaeological monitor. The archaeological monitor will be prepared with the basic equipment needed to perform site documentation, evaluation, and recovery of unanticipated discoveries. The archaeological monitor will follow all safety protocols required of personnel conducting construction activities. The archeological monitor will prepare daily field monitoring verification reports, noting observations, results, and actions taken, as appropriate, concerning the monitoring efforts. Digital photographs will be taken to record the construction activity as well as the character and provenience of any identified cultural resources. A technical report detailing the results of the archaeological monitoring will be completed after the conclusion of all construction excavation associated with the project.

## **ARCHAEOLOGICAL AWARENESS**

Prior to major construction activities, the project archaeologist will provide sufficient information to the on-site superintendent regarding the laws governing archaeological material and a copy of this Monitoring and Treatment Plan. The project archaeologist will also provide a copy of the contact list and a brief training to the construction crew to familiarize them with potential resources and the Unanticipated Discovery Plan. During the archaeological meeting, the project archaeologist will ensure that the construction foreman and other employees working in the project area understand the roles and responsibilities of the archaeological monitor, as well as the procedures to be followed in the event of an inadvertent discovery when the monitor is not on site.

## **TREATMENT OF CULTURAL RESOURCES**

If pre-contact or historic-period archaeological materials and/or features are encountered during the course of monitoring activities, all work within at least 30 ft. (10 m) of the find will halt, and the cultural resources representative of the Tulalip Tribes and the QCCC owners representative will be contacted immediately. The treatment of the archaeological materials and their potential National Register of Historic Places (NRHP) eligibility will be determined through coordination with Tribe. If avoidance of the resource is not feasible under project constraints, additional mitigation, including but not limited to NRHP-eligibility test excavations and/or data recovery excavations, may be required. A supplemental treatment plan may be required if potentially NRHP-eligible pre-contact cultural resources are encountered and cannot be avoided. The archaeological monitor will ensure that an area large enough to protect the integrity of the resource is avoided by construction excavation until the appropriate treatment measures are met. Construction excavation will continue in the area once the treatment of the resource has been completed. Potential NRHP-eligible cultural resources that could be encountered include but are not limited to:

- Intact shell midden deposits;
- Lithic concentrations and/or reduction sites;
- Fire modified rock (FMR) hearth features
- Historic period structural remains, intact refuse deposits, and/or privy features;
- Human remains.

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If cultural resources that are not eligible for the NRHP are encountered (e.g., low-density disturbed/displaced shell midden deposits; isolated pre-contact lithic artifacts; isolated historic-period bottles) construction will halt temporarily (less than 30 minutes) in the immediate vicinity (30 ft.) so that the archaeologist can document the find. Photographs, measurements, and notes will be taken to document the material. Construction will then continue in the area with an archaeological monitor present to ensure no additional cultural resources are encountered. The results of the documentation will be recorded on appropriate Washington State Department of Archaeology and Historic Preservation (DAHP) Inventory Forms and included with a report detailing the results of monitoring. Cultural resources that would not likely be eligible for the NRHP and could be encountered include but are not limited to:

- Low-density disturbed/displaced shell midden deposits;
- Isolated pre-contact lithic artifacts;
- Isolated historic-period bottles, wooden irrigation pipes, and/or agricultural tools.

## MONITORING PLAN SUMMARY

- An ASM archaeological monitor will be on-site during ground-disturbing activity.
- The archaeological monitor may request that construction activities be halted temporarily as necessary to allow photography and recovery of materials and data.
- The archaeological monitor will prepare daily field monitoring verification reports, noting observations, results, and actions taken, as appropriate, concerning the monitoring efforts.
- Digital photographs will be taken to record the construction activity as well as the character and provenience of any identified cultural resources.
- If archaeological materials and/or features are encountered during the course of monitoring activities, all work in the immediate vicinity (30 ft.) of the find will halt, and the cultural resources representative of the Tulalip Tribes and the QCCC owners representative will be contacted immediately. The treatment of the archaeological materials will be determined at that time. Construction excavation will continue in the area once treatment of the resource has been completed.
- ASM will submit a technical report detailing the results of the archaeological monitoring after fieldwork completion.
- If potential human remains are encountered during the project, all work in the area will halt and the protocols described in the following section will be implemented.

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## **UNANTICIPATED DISCOVERY PLAN**

The following sections details the procedures to be followed if construction activities associated with the QCCC Project inadvertently encounter cultural resources and/or human remains.

### **INADVERTENT DISCOVERY OF CULTURAL RESOURCES PROTOCOL**

Prior to commencement of project activities, construction personnel will be prepared for the possibility of encountering prehistoric and/or historic archaeological materials during ground-disturbing activities. In the event that construction activities associated with the project encounter cultural resources that are potentially eligible for the NRHP (e.g. intact shell midden deposits, lithic reduction sites, FMR hearth features, historic period refuse deposits and/or privy features, human remains), including archaeological artifacts, features, and/or sites, all work in the immediate vicinity will halt, and ASM will coordinate the treatment of the materials with the cultural resources representative of the Tulalip Tribes. Work shall not proceed in the area of discovery until notification to proceed is granted by the Tribe. Compliance with all applicable laws pertaining to archaeological resources is required.

If cultural resources that are not eligible for the NRHP are encountered (e.g., low-density disturbed/displaced shell midden deposits; isolated pre-contact lithic artifacts; isolated historic-period bottles or agricultural tools) construction will halt temporarily (less than 30 minutes) in the immediate vicinity (30 ft.) so that the archaeologist can document the find. Photographs, measurements, and notes will be taken to document material. Construction will then continue in the area with an archaeological monitor present to ensure no additional cultural resources are encountered. The results of the documentation will be recorded on appropriate DAHP Inventory Forms and included with a report detailing the results of the monitoring.

### **INADVERTENT DISCOVERY OF HUMAN REMAINS**

If human remains are encountered during the project, ASM will immediately contact the Snohomish County Medical Examiner, the Snohomish County Sheriff, the cultural resources representative of the Tulalip Tribes, the QCCC owners representative, and the DAHP State Physical Anthropologist, and the following protocol will be applied:

- All persons who know of the existence and location of human remains must, by law, notify the county medical examiner and local law enforcement. This will be done in the most expeditious manner possible (RCW 27.44; 68.50; 68.60).
- Any person engaging in ground-disturbing activities that encounter skeletal human remains will cease all activity that may cause further disturbance to the remains, make a reasonable effort to protect the area from further disturbance, and report the presence and location of those remains to the medical examiner and local law enforcement (RCW 27.44; 68.50;68.60).
- The county medical examiner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic (RCW 27.44; 68.50; 68.60).
- If the county medical examiner determines the remains are non-forensic, then the DAHP will take jurisdiction over the remains (RCW27.44; 68.50; 68.60).
- The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to the affected parties (RCW 27.44, 68.50; 68.60).

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## QCCC PROJECT CONTACT INFORMATION

<b>Name</b>	<b>Organization</b>	<b>Title</b>	<b>Email</b>	<b>Phone#</b>
Richard Young	Tulalip Tribes	Cultural Resources	ryoung@tulaliptribes-nsn.gov	(360) 716-2652
Guy Tasa	DAHP	State Physical Anthropologist	guy.tasa@dahp.wa.gov	(360) 586-3534
Daniel Selove	Snohomish County	Chief Medical Examiner	contact.medadmin@snoco.org	(425) 438-6200
	Snohomish County	Sheriff's Department	contact.sheriff@snoco.org	(425) 388-3393
Kurt Peterson	KPMC Ventures	QCCC Owners Representative	kpmcllc@comcast.net	(206) 245-7848
Jon Dalton	Wright Hotel Development	Superintendent	jon@wrighthd.com	(503) 748-9251
Alan Fenrich	Tribal Designs	Superintendent	alan@tribaldesignsinc.com	(425) 622-8510
Dave Iversen	ASM Affiliates, Inc.	Archaeologist	diversen@asmaffiliates.com	(360) 631-9685

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## REFERENCES

Iversen, Dave, and Aubrey Steingraber

2016 *Cultural Resources Assessment for the Quil Ceda Creek Casino Project, Tulalip Indian Reservation, Snohomish County, Washington*. Report on file at the Department of Archaeology and Historic Preservation, Olympia, Washington.

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**APPENDIX A**  
**QCCC Site Plan**



Quil Ceda Creek Casino and Hotel Site Plan

December 2017