

Appendix M

Archaeological Inadvertent Discovery Plan

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**Northwest Alloys, Inc.  
Longview, Washington**

**Archaeological Inadvertent Discovery Plan  
Former Reynolds Metals Reduction Plant  
MTCA Cleanup Action**

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Prepared by:

Stephanie Butler, MA, RPA  
AECOM  
888 SW 5<sup>th</sup> Ave, Suite 600  
Portland, Oregon 97204

Prepared for:

Northwest Alloys – Longview  
P.O. Box 2098  
4029 Industrial Way  
Longview, WA 98632

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# 1 Introduction

Northwest Alloys, Inc. (Northwest Alloys) is proposing to conduct cleanup and remedial action at a former aluminum smelter situated at 4029 Industrial Way, Longview, Cowlitz County, Washington, 98632.

This Archaeological Inadvertent Discovery Plan (IDP) describes the procedures to be used during ground-disturbing activities associated with the cleanup and remedial action in the event human skeletal remains or archaeological materials are unexpectedly encountered. Northwest Alloys contracted with AECOM Technical Services, Inc. (AECOM) to provide this document as a best management practice so that Project personnel are aware of the steps they must take in the event a discovery is made, in compliance with state laws.

This document addresses the following topics:

- What Are Cultural Resources?
- Existing Conditions
- Steps to Take for Inadvertent Discovery of Archaeological Materials
- Steps to Take for Inadvertent Discovery of Human Remains
- Contact Information

## 1.1 Project Summary

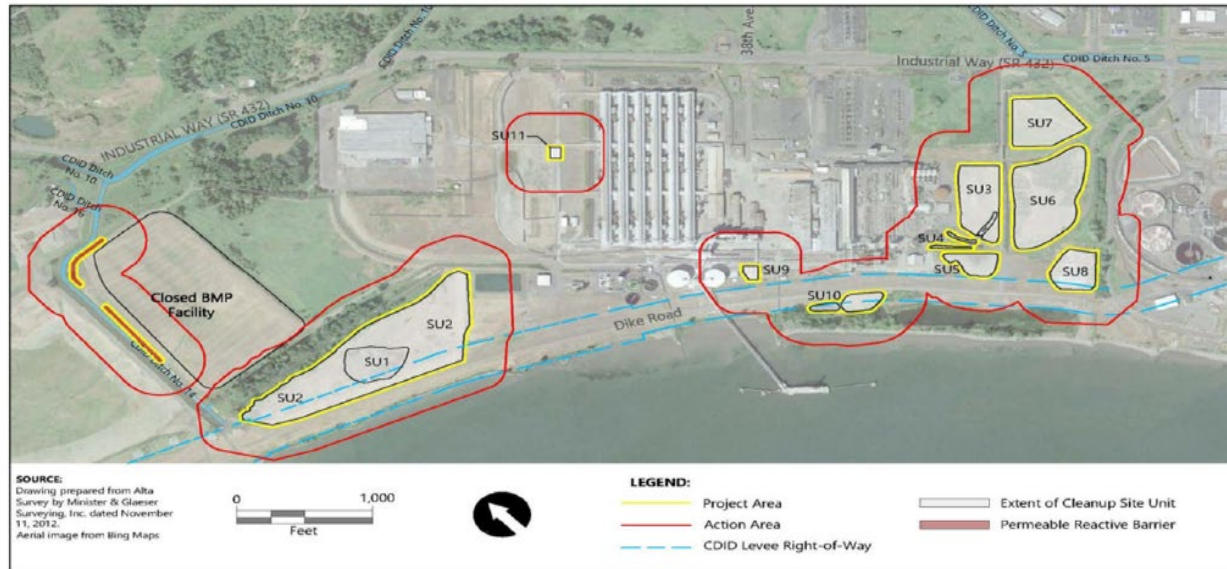
Northwest Alloys, Inc. is proposing to conduct cleanup and remediation of the former Reynolds Metals Reduction Plant site on the Columbia River. This cleanup action is being administered under Washington State's Model Toxics Cleanup Act (MTCA). Specific corrective and remedial measures for control and removal of sources of contaminants is required in surface water, groundwater, and soils. Northwest Alloys, Inc. will implement this action, to meet and achieve cleanup levels and remedial standards under MTCA (WAC 173-340), and applicable landfill requirement.

The remediation will occur at 13 site units (SUs), two of which have already been remediated. The proposed action will entail a combination of excavation/capping, backfill, consolidation, and offsite disposal of hazardous materials. Clean-up will be achieved either by excavation and off-site disposal or excavation and on-site consolidation. On-site consolidation will then be supplemented by low permeability caps, reactive backfill, and permeable reactive barriers. Impacted materials from SU3, SU5, SU8, SU10, and the eastern and western portions of SU2 will be excavated and consolidated with three landfills: West Landfill, East Landfill No.1, and East Landfill No.2. Following consolidation, these areas will be capped. The Project involves maintaining the existing roadside ditches (CD02, CD03, and CD04) located in the vicinity of East Landfill No. 1 and East Landfill No. 2. Ditch

maintenance will involve regrading (select excavation and filling) to maintain the ditches stormwater storage and conveyance functions.

## 1.2 Location

The Project is located at 4029 Industrial Way, Longview; Parcel 619530400; Latitude: 46.082801, Longitude: -122.595674; within Section 36, Township 8 North, Range 3 West, Willamette Meridian. Figure 1 identifies the MTCA Cleanup and Remediation Acton Area,



**Figure 1. MTCA Cleanup and Remediation Acton Area.**

## 1.3 Regulatory Context

The Project requires a Nationwide Permit 38 from the U.S. Army Corps of Engineers (USACE). This approval was granted by the USACE on February 3, 2023 subject to compliance with *NWP38, Terms and Conditions*. National General Condition 21, *Discovery of Previously Unknown Remains and Artifacts*, found in the *Nationwide Permit Terms and Conditions* enclosure, details procedures that must be followed should an inadvertent discovery occur. Northwest Alloys, Inc. is required to ensure that we comply with this condition during the construction of the project. This Plan describes the procedures that will be followed should previously unknown remains and artifacts be found.

The Project is also required to comply with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. The Section 106 process addresses post-review discoveries and unanticipated effects under 36 CFR Part 800.13(b). The USACE is the lead federal agency for purposes of Section 106 compliance.

In addition to the NHPA, several Washington State laws address archaeological sites and Native American burials that apply to the Project area. For example, the Archaeological Sites

and Resources Act [RCW 27.53] prohibits knowingly excavating or disturbing prehistoric and historic archaeological sites on public or private land. The Indian Graves and Records Act [RCW 27.44] prohibits knowingly destroying American Indian graves and provides that inadvertent disturbance of human remains through construction or other activity requires re-interment under supervision of the appropriate Indian tribe.

## 2 What Are Archaeological Resources?

Archaeological sites can be on the ground surface or deeply buried and range from very small clusters of artifacts to large sites spanning acres in size. Precontact and post-contact/historic cultural resources include, but are not limited to, the following examples (Figures 2 and 3): <sup>1</sup>

### **Precontact Resources**

- Lithic flakes (stone chips and other tool-making byproducts)
- Flaked or ground stone tools
- Exotic rock, minerals, or quarries
- Concentrations of dark, organically stained sediments, charcoal, or ash (i.e., hearths or middens)
- Fire-modified rock
- Rock alignments or rock structures (i.e., rings, walls, cairns)
- Bone (burned, modified, or in association with other bone, artifacts, or features)
- Shell accumulation piles, mounds, or fragments
- Petroglyphs and pictographs
- Fish weirs and traps and other fishing technology
- Culturally modified (i.e., carved, peeled) trees
- Physical locations or features and landscapes (traditional cultural properties)

### **Post-contact/Historic-era Resources**

May include any of the following items over 50 years old:

- Bottles or other glass
- Cans
- Ceramics
- Milled wood, brick, concrete, metal, or other building material
- Trash dumps
- Homesteads, building remains
- Logging, mining, or railroad features
- Piers, wharves, docks, bridges, dams
- Automobile and machinery parts

Skeletal human remains, cemeteries, burial places and burial items are considered differently than “archaeological” resources and have different protocol that must be followed in the event of an inadvertent discovery.

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<sup>1</sup> “Precontact” refers to that period before Native Americans first had contact with European and Asian explorers, which probably first occurred along the Northwest Coast around 250 years ago.





Hearth with Fire-Modified Rocks and Charcoal Stained Soils



Shell Midden (cross section)



Shell Midden (plan view)



House Pit Depression



Flaked Stone Tools



Stone Flakes (Debitage)



Modified Trees



Stone Pestle



Circular Rock Feature



Woven Matting/Basketry



Rock Wall



Rock Cairn



Talus Slope Pit



Animal Bones Feature



Bone Fishing Tools



Petroglyphs and Pictographs

**Figure 2. Examples of precontact-era cultural resources.**





Collapsed Cabins



Building Foundations



Barns and Farmsteads



Graves and Cemeteries



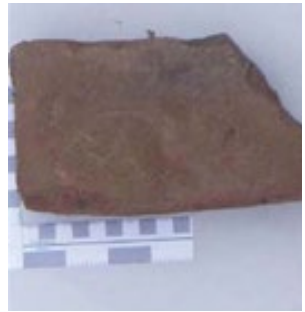
Logging (Springboard Stumps)



Insulator, Doll Leg, Bullet Casing



Tin cans and Enamelware



Handmade Bricks



Glass Bottles and Fragments



Old Piers and Wharves



Ceramic Vessels and Fragments



Metal Tools



Wagon Roads



Mine Shafts and Pits



Abandoned Railroads



Privy and Wells

**Figure 3. Examples of historic-era cultural resources.**

### **3 Existing Conditions**

This section briefly describes results of the previous archaeological investigations that have occurred at the Former Reynolds Plant and help inform expectations for what may be considered an “inadvertent discovery.”

#### **3.1 Previous Investigations**

The Former Reynolds Plant is located in an area considered to have archaeological sensitivity given its geographic location along the Columbia River. The shoreline in the vicinity of the Project area was an important Tribal burial location and village site, and by the late 1800s there were also historic ferry landings, homesteads, and a post office.

A Cultural Resources Assessment identified significant historic properties including the Reynolds Plant Historic District, which includes above-ground buildings and structures and archaeological landscape features associated with the Former Reynolds Plant (Ranzetta et al. 2015). Cowlitz County authorized demolition of these buildings for the Project.

Exploratory deep subsurface testing was also conducted to determine potential for precontact (prehistoric) sites to be located below, or possibly intermixed within, the WWII-era Former Reynolds Plant industrial development zone. No precontact archaeological sites have been encountered to date, but such sites could still exist in this type of landform and could be deeply buried below the current ground surface. However, the proposed Project is anticipated to occur mostly to entirely within disturbed fill that was placed on the site in conjunction with World War II-era development. The exact depth of fill varies across the site. Also, it is always possible that the fill had archaeological resources present before it was used to infill the site. Evidence of such past uses could potentially be encountered.

#### **3.2 Exceptions for Former Reynolds Plant Debris**

This IDP is not intended to apply to the industrial debris associated with the Former Reynolds Plant. These include occasional bottles and glass, ceramic fragments, bricks, metal debris, light bulbs, cement, wood and cut lumber, trash, machinery parts, and other similar types of common industrial and infrastructure materials, which are expected and do not warrant further management.

However, personnel must report any unusual finds to the on-site Northwest Alloys Environmental Department. For example, historic features such as refuse pits with numerous intact bottles, can dumps, and older foundations beneath and unrelated to the WWII-era buildings being demolished, would require further treatment following the IDP because these types of features have not been previously identified at the site.

Examples of common industrial materials observed at the site that are not to be considered “inadvertent discoveries” are provided in Figure 4 below.

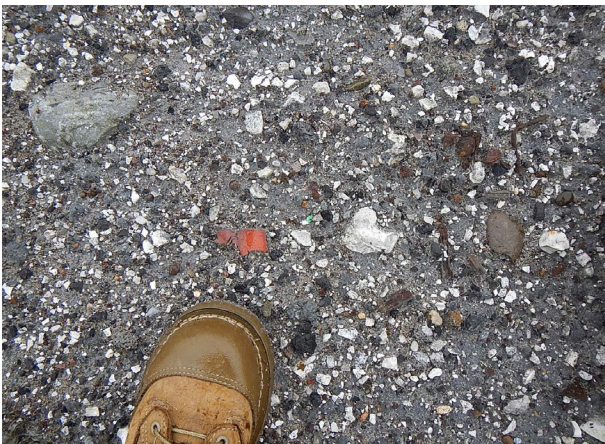




Example of debris associated with landfills



Example of debris associated with landfills



Small fragments of brick and metal debris, and coke and lime by-products



Abandoned rails on ground surface



Buried cable fragment



Bricks and concrete

**Figure 4. Common types of non-archaeological Former Reynolds Plant debris (exempt).**

## 4 Protocol for Inadvertent Discovery of Archaeological Resources

This section identifies the key responsibilities in the event of a discovery of a potential archaeological resource during implementation of the Project. In the unanticipated event of a discovery, the following steps shall be taken. Failure to comply with these requirements could constitute a Class C Felony.

**Step 1. Stop Work and Protect the Discovery Site.** If any employee, contractor, or subcontractor believes that he or she has uncovered an archaeological resource, all work within a minimum of 50 feet of the discovery (“discovery site”) shall be stopped to provide for its security, protection, and integrity. The discovery site shall be secured. Vehicles, equipment, and unauthorized personnel will not be permitted to traverse the discovery site.

**Step 2. Notify Project Management.** The individual making the discovery shall immediately contact the Northwest Alloys Director, Transformation – Western US and notify her of the discovery site. If the Director is not immediately available, then the Northwest Alloys Environmental Program Manager shall be contacted.

**Step 3. Notify Project Archaeologist.** Immediately following the work stoppage and notification to Northwest Alloys, Northwest Alloys will contact the Project Archaeologist.

**Step 4. Assess Find.** The Project Archaeologist shall be qualified as a professional archaeologist under the RCW 27.53.030(11), and as such, is qualified to examine the find to determine if it is an archaeological site. If the find is confirmed to be an archaeological site and the archaeological deposits cannot be avoided, evaluation and testing to determine the nature of the cultural resource may be required. Work will be suspended in that area, and site testing will not take place without a permit from DAHP (RCW 27.53). Any type of testing or mitigation will depend upon the nature of the resource and would be developed as part of the DAHP permit.

**Step 5. Notify Additional Parties.** If the discovery is determined by the Project Archaeologist to be an archaeological resource, the Northwest Alloys Director, Transformation – Western US will continue with notification to DAHP, and if the remains are precontact or Native American, the affected Tribes, within two (2) working days. If the find may relate to human remains or funerary objects, protocol outlined in the following section regarding human remains shall be enacted. Confidentiality of the find shall be maintained by all personnel.

**Step 6. Obtain Consent to Proceed with Construction.** Construction work shall not recommence at the discovery site until treatment has been completed and the Tribes, DAHP, and/or jurisdictional agencies, as appropriate, have provided written or verbal consent to proceed.

## 5 Protocol for Inadvertent Discovery of Human Remains

If likely or confirmed human remains are encountered, all further ground-disturbing activities will cease immediately. Any human remains that are discovered during construction will be treated with dignity and respect. The following procedures will be enacted. Failure to comply with these requirements could constitute a Class C Felony.

**Step 1. Stop Work and Protect the Discovery Site.** In the event that an employee, contractor, or subcontractor believes that he or she has uncovered any human skeletal remains, the Construction Supervisor will stop all work within a minimum of 100 feet of the remains to provide for their total security, protection, and integrity. Remains will immediately be covered with a tarp only, for temporary protection in place and to shield them from being photographed. The discovery location will not be left unsecured at any time, and confidentiality will be maintained by all personnel.

**Step 2. Notify Project Management.** The Construction Supervisor will immediately contact the Northwest Alloys Director, Transformation – Western US. If the Director is not immediately available, then the Northwest Alloys Environmental Program Manager will be contacted.

**Step 3. Notify Law Enforcement and County Coroner's Office.** If human remains are known or suspected, the Northwest Alloys Director, Transformation – Western US or her designee will notify the Cowlitz County Sheriff's Office and the Cowlitz County Coroner's Office in the most expeditious manner possible (RCW 27.44; 68.50; 68.60). The County Coroner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the County Coroner determines the remains are non-forensic, then they will report that finding to DAHP, who will then take jurisdiction over the remains.

**Step 4. Notify Tribes and DAHP.** Concurrently, Northwest Alloys Director, Transformation – Western US will immediately notify the affected Tribes, DAHP, and the Project Archaeologist. DAHP will have jurisdiction over non-forensic human remains and report them to any appropriate cemeteries and affected Tribes. The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and affected tribes (RCW 27.44, 68.50, 68.60). DAHP will handle all consultation regarding the preservation, excavation, and disposition of the remains.

**Step 6. Obtain Consent to Proceed with Construction.** Ground-disturbing activities will not resume at the location of the discovery area and the construction buffer until the affected Tribes, DAHP, and/or jurisdictional agencies, as appropriate, have provided written consent to proceed.

## 6 Contact Information

**Table 1. Contacts for Inadvertent Discovery of Archaeological Resources or Human Remains**

Name	Organization	Role	Phone
Kristin Gaines	Northwest Alloys - Longview	Northwest Alloys Director, Transformation – Western US	360-425-2800 C: 360-798-2509 <a href="mailto:Kristin.gaines@alcoa.com">Kristin.gaines@alcoa.com</a>
Cheryl Vezzani	Northwest Alloys – Longview	Environmental Program Manager	360-425-2800 C: 503-502-8925 <a href="mailto:Cheryl.vezzani@alcoa.com">Cheryl.vezzani@alcoa.com</a>
Stephanie Butler	AECOM	Principal Archaeologist	C: 503-913-5644 <a href="mailto:Stephanie.butler@aecom.com">Stephanie.butler@aecom.com</a>
Maralee Wernz	AECOM	Principal Archaeologist (Alt.)	C: 541-980-3273 <a href="mailto:maralee.wernz@aecom.com">maralee.wernz@aecom.com</a>
Travis Kephart	Cowlitz County Building and Planning	Assistant Environmental Planner	360-577-3052 ext. 6657 <a href="mailto:kephart@co.cowlitz.wa.us">kephart@co.cowlitz.wa.us</a>
George Winn	Cowlitz County Building and Planning	Historic Preservation Officer	360-577-3042 ext. 6664 <a href="mailto:winn@co.cowlitz.wa.us">winn@co.cowlitz.wa.us</a>
Rob Whitlam	DAHP	State Archaeologist	360-890-2615 <a href="mailto:Rob.Whitlam@daph.wa.gov">Rob.Whitlam@daph.wa.gov</a>
Stephanie Jolivet	DAHP	Local Govt. Archaeologist (SEPA)	360-628-2755 <a href="mailto:Stephanie.Jolivet@daph.wa.gov">Stephanie.Jolivet@daph.wa.gov</a>
Dr. Guy Tasa	DAHP	State Physical Anthropologist	360-790-1633 <a href="mailto:Guy.tasa@daph.wa.gov">Guy.tasa@daph.wa.gov</a>
Seth Russell	Cowlitz Indian Tribe	Tribal Historic Preservation Officer	360-353-9924 <a href="mailto:srussell@cowlitz.org">srussell@cowlitz.org</a>
Dan Penn	Chehalis Tribe	Tribal Historic Preservation Officer	360-709-1747 <a href="mailto:dpenn@chehalis-tribe.org">dpenn@chehalis-tribe.org</a>
Tony Johnson	Chinook Indian Nation	Chairman	360-875-6670 <a href="mailto:office@chinooknation.org">office@chinooknation.org</a>
Chris Bailey	Grand Ronde Tribes	Cultural Protection Coord.	503-879-1675 <a href="mailto:Chris.Bailey@grandronde.org">Chris.Bailey@grandronde.org</a>
Robert Brunoe	Warm Springs Tribes	Tribal Historic Preservation Officer	<a href="mailto:Robert.brunoe@wstribe.org">Robert.brunoe@wstribe.org</a>
Jerry Meninick	Yakama Nation	Cultural Resources Director	509-865-5121 <a href="mailto:Jerry_meninick@yakama.com">Jerry_meninick@yakama.com</a>
Timothy Davidson	Cowlitz County Coroner's Office	Medical Officer/Coroner	360-577-3079
Non-Emergency Contact	Cowlitz County Sheriff's Office	Local Law Enforcement	360-577-3092

## 7 References

Ranzetta, Kirk, Sarah McDaniel, Leesa Gratreak, Stephanie Butler, and James Meyer. 2015. Millennium Coal Export Terminal, Longview, Washington: Historic and Cultural Resources Assessment. Prepared by AECOM, Portland, Oregon, for Millennium Bulk Terminals, Longview, Washington. October 1, 2015.