



To: Carrie Richter, Bateman Seidel Miner Blomgren Chellis & Gram, P.C.

From: Paul Solimano, Archaeologist

Date: June 29, 2023

Re: Review of Archaeological Investigations for the Carpenter Lane Project

I was asked to review the Portland Water Bureau's (PWB) compliance with federal, state, and local cultural resource laws and regulations for construction of a new filtration plant in Eastern Clackamas and Multnomah counties. I have over 30 years of experience identifying and evaluating archaeological resources. I am qualified as a Registered Professional Archaeologist (RPA) and am a senior partner in one of the region's largest cultural resource management (CRM) companies. I specialize in precontact archaeology with a research focus on development of precontact settlement and subsistence systems. I am a past Vice Chair of the Portland Historic Landmarks Commission, past Director-at-Large for the Association for Washington Archaeology, and a research associate at Portland State University. I have authored multiple professional papers and present regularly at regional conferences.

The PWB's project is partially funded by the Environmental Protection Agency (EPA) and as such, must comply with Section 106 of the National Historic Preservation Act (NHPA), with EPA as Lead Federal Agency. The project must also conform with Oregon State Law and align with the Statewide Planning Goals as outlined in the Multnomah County Comprehensive Plan. In my professional opinion, the proposed project proponents have not fully complied with Section 106, ORS 358.653, or with the Multnomah County Comprehensive Plan's Policies and Strategies for Historic and Cultural Resources (2016: 6-8, 6-9). Specifically, Policy 6.2/Strategy 6.2-2, Policy 6.4, and Policy 6.5.

To assist the PWB in complying with Section 106 of the NHPA, Heritage Research Associates (HRA) conducted background research and a field study of the proposed Filtration Plant and associated pipeline route alternatives (Musil and Oetting 2021). Background research and field methods conformed to industry standards, although no subsurface probes or trenches were excavated. No archaeological material was found on either the Filtration Plant property or along the pipeline route alternatives. HRA recommended the project proceed with an inadvertent discovery plan (IDP) in place (Musil and Oetting 2021) and some archaeological monitoring of earth moving construction activities in specific locations (Musil and Oetting 2021:43). Areas slated for construction monitoring were selected for their potential for historic-era archaeological materials and not precontact archaeological deposits.

Since Oetting and Musil (2021) completed their fieldwork, additional information has arisen indicating precontact archaeological materials are, in fact, located on the proposed Filtration Plant parcel and along some of the proposed finished water alternative routes. The information was obtained from long-term residents of the area (one current, one former), who provide convincing evidence that the proposed project has the potential to impact several precontact archaeological sites.

Mr. Arden Meyer's father Ernest purchased the property south of Carpenter Lane in the 1930s. This parcel is the location of the proposed filtration plant. The property had one subsequent owner who sold it to the City of Portland in the 1970s. In an interview, Mr. Meyer (personal communication 2-28-2023, see attached) reported collecting precontact artifacts from the property as a child while helping his father clear and farm the land. Mr. Meyer provided photographs of the artifact collection (see attached).

Ms. Annell Carlson's family has owned the property at 32627 SE Lusted Rd, Gresham, OR since 1905. This property is adjacent to a portion of the preferred finished water pipeline. Ms. Carlson reported that her family has consistently collected precontact artifacts from the property. She suggests that many of the artifacts were collected from near the house, which is directly adjacent to the proposed pipeline (Annell Carlson personal communication 6-14-2023, see attached).

The proposed Filtration Plant project vicinity includes the deeply incised Sandy River, its floodplains, and river terraces as well as the rolling uplands adjacent to the drainage. The uplands, where the filtration plant and pipelines are planned, contain small rises and swales along the headwaters of Johnson Creek. Throughout the Holocene, these areas would have hosted a wide range of microenvironments vital to Native People's subsistence and it would not be unreasonable to assume many precontact sites are in the local area.

I reviewed photographs of the artifacts collected by both the Meyer and Carlson families. The artifacts represent the types of items expected for the area. The distance between the locations of the two artifact collections indicates that the collections came from at least two spatially discrete precontact archaeological sites. Each collection consists principally of projectile points that mostly date to between 5,000 and 2,000 years ago based on their shape and size. Some substantially older projectile points are also present in each collection, however. This time is poorly represented in the regional archaeological record and straddles people's change from a mobile to a more sedentary settlement and subsistence system with increased reliance on stored foods.

Section 106 of the NHPA, ORS 358.653 and Policies 6.2 to 6.5 of the Multnomah County Comprehensive Plan for Archaeological and Cultural Resources (2016: 6-8, 6-9) vary in their language and process details, but all have essentially the same goals:

1. Identify archaeological resources,
2. Evaluate the importance of the resources, and
3. Consider ways to avoid or minimize impacts to important resources.

The Multnomah County Comprehensive Plan explicitly calls for identifying archaeological resources in part by involving local landowners (Policy 6.2/Strategy 6.2-3), and “where development is proposed on areas of cultural significance, require evaluation of alternative sites or designs that reduce or eliminate impacts to the resource” (Policy 6.5).

The presence of at least two precontact sites in or near areas where proposed construction will be occurring is troubling and indicates the identification aspect of Federal, State, and County laws and regulations have not been met. If the identification phase is lacking, all subsequent compliance steps are incomplete.

Because the general project vicinity has a high probability for precontact archaeological resources and convincing evidence exists that precontact archaeological sites are present, a more robust identification effort is needed to formally identify archaeological resources. Archaeological monitoring of construction activities is not a substitute for earlier resource identification. Monitoring should only occur when other identification efforts have been exhausted or are not possible (e.g., the area is covered in thick artificial fill).

A more robust identification effort should include a geoarchaeological study to establish the history of landform development (including natural and man-made alterations to the landscape) and assess the potential for buried archaeological materials at the filtration plant and along the pipeline routes. This study should inform a subsequent intensive survey of the proposed project lands that includes subsurface investigations. Subsurface investigations should include some combination of shovel probes, augering or backhoe trenching as appropriate.

Yours truly,



Paul Solimano
Archaeologist

Reference

Musil, Robert R., and Albert C. Oetting
2021 Archaeological Survey of the Proposed Portland Water Bureau Bull Run Water Treatment Plant Project, Gresham Vicinity, Clackamas and Multnomah Counties, Oregon.
Prepared for Brown and Caldwell, Portland, Oregon, and Portland Water Bureau, Portland, Oregon. Heritage Research Associates, Inc., Eugene, Oregon.

Arden Meyer Interview 02/28/2023

Arden Meyer Review of Draft Interview 06/01/2023

Interview conducted by Lauren Courter, Paul Willis

Present During Interview: Doug & Pat Meyer, Arden Meyer

When the Meyer family purchased their properties in Multnomah Co in the 1930s, a majority of 80 acres to the south of the previous Bull Run railroad (present day SE Dodge Park Blvd) were "stump-land", including the ~40 acre property currently owned by the Portland Water Bureau (Figure 1). Ernest Meyer and Fred Meyer, Arden's father and grandfather, respectively, owned property to the north of the previous Bull Run railroad, a single property on SE Carpenter Lane, and a ten acre parcel to the south bordering Johnson Creek in Clackamas County. Ernest Meyer owned other properties south of the Bull Run railroad, as shown in Figure 1. The following account largely relates to the ~40 acre parcel currently owned by the Portland Water Bureau.

Arden is Ernest's son and when he was 6 years old, his dad used dynamite to help remove the tree stumps and roots. Following dynamiting, Arden and his sibling used tractors to pull stumps and roots from the property, which took approximately 4 years. Arden remembers the stumps and roots were up to 5 ft deep – as he remembers standing in the holes. Following removal of the stumps and roots, Ernest tilled and plowed 10-12 inches of the top soil to level the 40 acres and about 10-15 acres to the southwest of that property. As Ernest worked the soil, he started to uncover Native American artifacts. These artifacts included arrowheads, bowls, and "tomahawks". Ernest continued to uncover similar artifacts as he farmed for raspberries and blueberries over the years. Arden says that his dad gained "an eye" for noticing artifacts and he would keep ones that were "perfect" looking and intact, leaving behind broken pieces. Ernest kept a display of the artifacts he collected (see photos).

Dr. Brown bought the Meyer's 40 acres , who eventually sold it to the City of Portland in the 1970s.

Photos

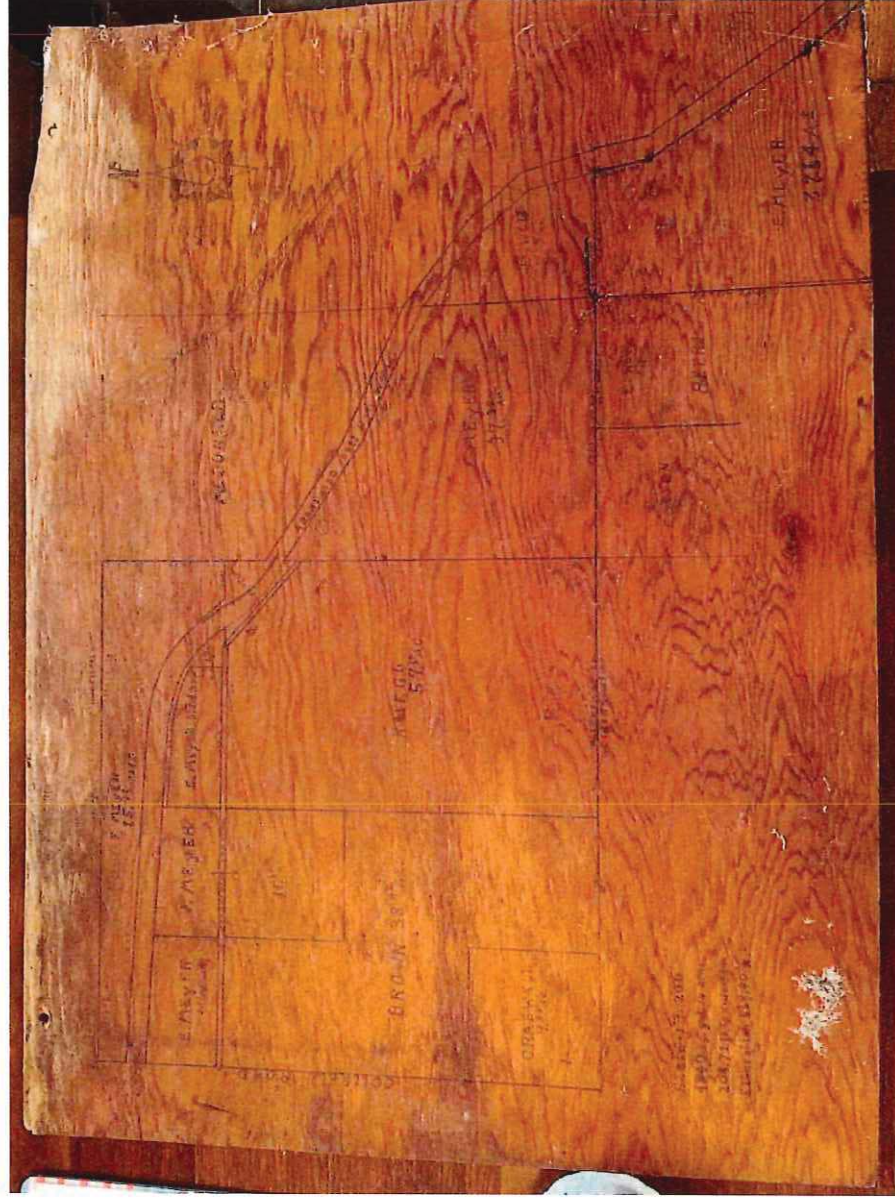


Figure 1. Hand-drawn map of properties owned by the Meyer, McDonald, Brown, Ruegg, Craswell, Colson, and Beers families at SE Cottrell and SE Carpenter Lane. The previous Bull Run railway (now SE Dodge Park Blvd) to the north and the Multnomah-Clackamas county line to the south. Map was created in the 1940s by Ernest Meyer, owner of the Meyer properties shown. The previous 57 acre Ruegg and 37 acre Meyer properties make up the majority of the current Portland Water Bureau property designated for the proposed Bull Run water filtration project.

HOHOKAM (the Ancient One)
An introduction to the contrast of Ancient and Modern
Artillery Display. By Ernest L. Meyer.

The display of HOHOKAM, the Ancient One, was made in the early 1970's when I was recuperating from a sprained ankle.

The frame for the glass front was once a barnacled piece of mahogany driftwood, found on the beach near Westport, Wa.

Most of the Indian Artifacts were collected from 1930 to 1970, during 40 years of farming 80 acres, usually found after heavy rains on newly-plowed or cultivated fields or hoeing row-crops. Exceptions are noted in the display.

Exceptions: #1 and 2.

(1) Miss May Turner, my 3rd grade teacher, mailed me this arrowhead that she had found in Colorado in 1915. As I lived in Raymond, Washington at the time, little did I realize that it was to become the nucleus of the HoHoKam collection.

2. My sister-in-law, Dorothy Naas, found this arrowhead during a fishing trip in the Wallow Mountains.

3. Fangs from a half-shepherd-half cyote dog killed by hound dogs at Smith Creek, Wa. 1913.

4. Rock Image

5 & 6. Rock weapons, #5 was picked up in the yard of the Methodist church in Boring, OR. #6 found on the '40' acre field when clearing land.

7. Grooved rocks — fishnet weights.

8. Hide Scraper.

9. Beverly Beach, Oregon — Clam fossils

and 10.

11. Modern 20 MM Artillery & rifle shells, Camp Lewis, WA. found by Alfred Meyer.

12. Petrified Wood — Arizona, estimated 60,000 yrs. old.

13. Sliced agate, Carefree, Arizona 1986

14. Black Lava — Kilauea, Hawaii from Arden Meyer.

15. Stalactite — from Carlsbad Caverns, New Mexico, 1953.

16. Obsidian Rock from East Lake, OR; red iron oxide.

17. Alfred Meyer found this along the Willamette River (sandstone (petrified bar of soap??) 18. Ellene's Baby Tooth.

19. Freshly baked Lava, 1980, Kilauea, Hawaii; "Madam Pelee's Angry Froth!"

28. JAR: Odds & Ends — polished AGATES and unpolished; E.L.A.M.

29. Jeff Boden, a Coral, Island of Hawaii, 1980.

30. Paddle carved from scrap of Koa wood given to me by two natives making a dugout canoe from a log, in the city of Refuge, Hawaii, 1979.

31. Marble Rock; shore of Ukon R. Alaska 1983. 32. Arizona Petrified Wood — 1953.

33. This knife was acquired by Alfred Meyer, with a shipmate's help, when on shoreleave, in a skirmish with a belligerent Mexican. Time: 1918 World War One. Ship, U.S.S. Marblehead; Place: Vera Cruz, Mexico.

34. Quartz-bear ing held; Gift from Aunt Salena, 1-24-1957.

18 Ellene Baby Tooth

Figure 2. Ernest Meyer's account of his artifact display. Artifacts were gathered from around the country. Items #5 and 6 were rock weapons gathered from the present-day ~40 acres owned by the Portland Water Bureau.



Figure 3. Inventory #5 on Ernest Meyer's artifact list in Figure 2. Rock weapon found on the grounds of the Methodist church in Boring, corner of SE Bluff Rd and SE Pleasant Home Rd.



Figure 4a. Inventory #6 on Ernest Meyer's artifact list in Figure 2. Arrowheads found on the current Portland Water Bureau property. Ernest found these artifacts while plowing, tilling, and farming the ~40 acres between 1930s and 1970s.



Figure 4b. Inventory #6 on Ernest Meyer's artifact list in Figure 2. Arrowheads found on the current Portland Water Bureau property. Ernest found these artifacts while plowing, tilling, and farming the ~40 acres between 1930s and 1970s.

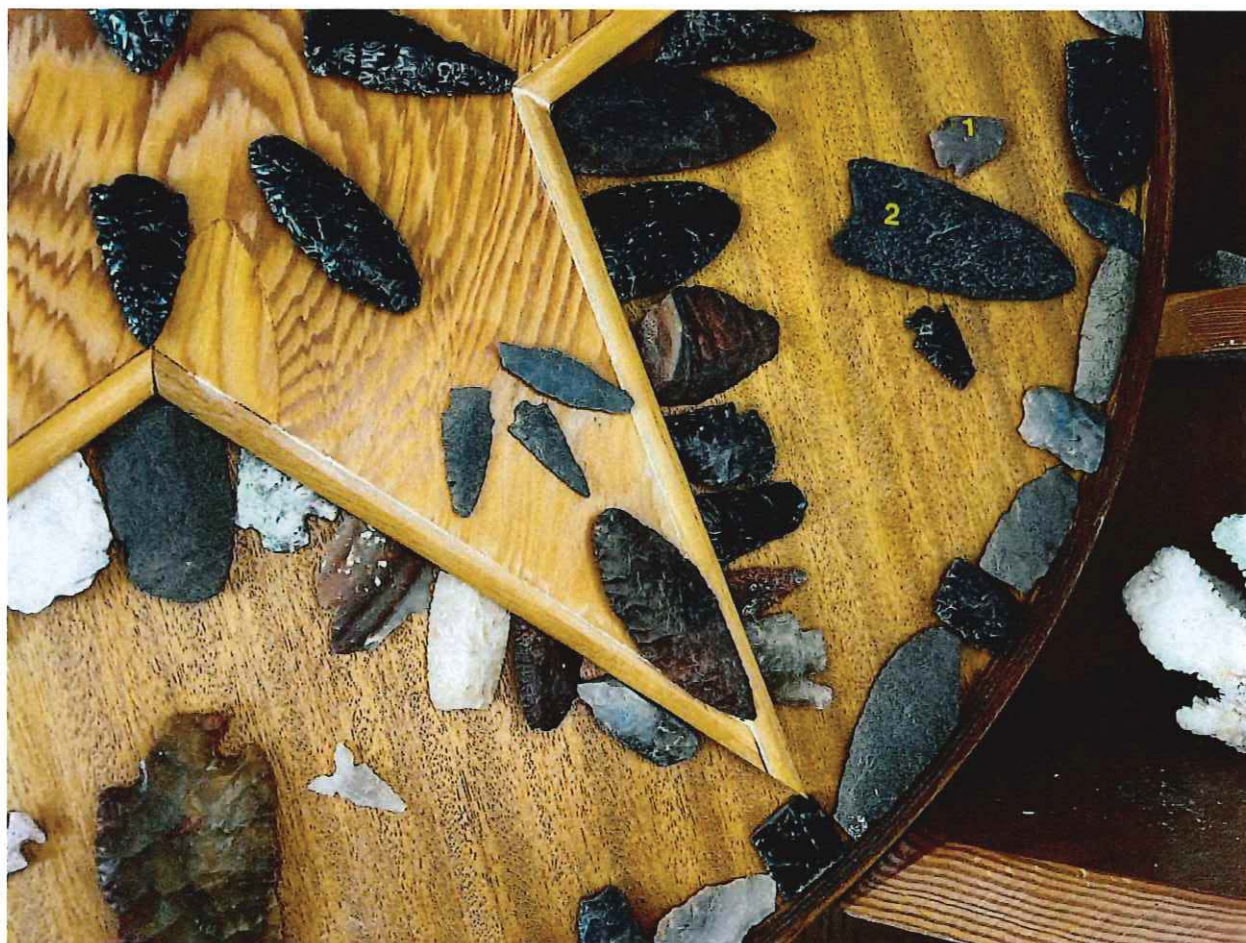


Figure 4c. Inventory #6 on Ernest Meyer's artifact list in Figure 2. Arrowheads found on the current Portland Water Bureau property. Ernest found these artifacts while plowing, tilling, and farming the ~40 acres between 1930s and 1970s. Artifacts denoted by "1" and "2" were not found on the property.



Figure 4d. Inventory #6 on Ernest Meyer's artifact list in Figure 2. Arrowheads found on the current Portland Water Bureau property. Ernest found these artifacts while plowing, tilling, and farming the ~40 acres between 1930s and 1970s.

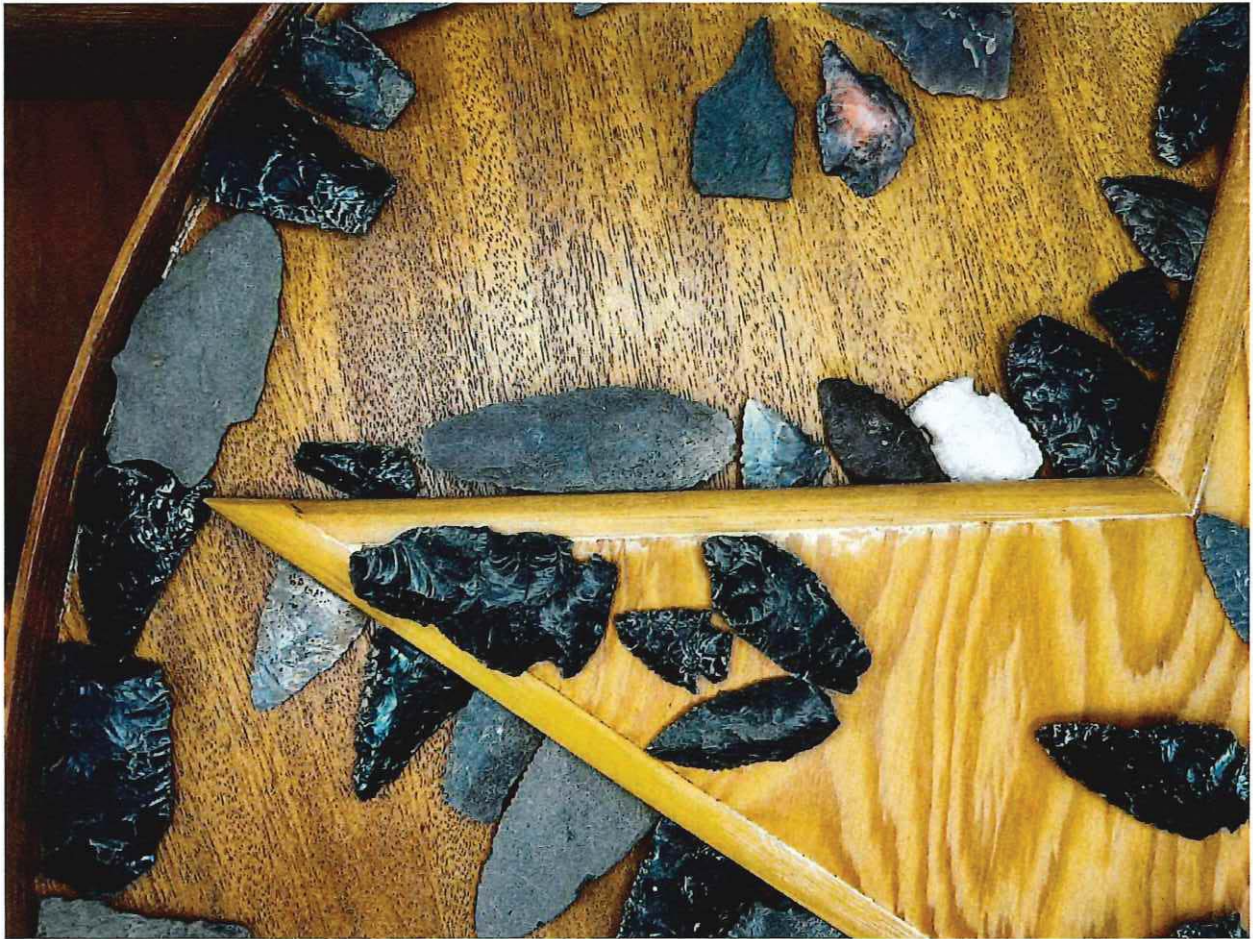


Figure 4e. Inventory #6 on Ernest Meyer's artifact list in Figure 2. Arrowheads found on the current Portland Water Bureau property. Ernest found these artifacts while plowing, tilling, and farming the ~40 acres between 1930s and 1970s.



Figure 4f. Inventory #6 on Ernest Meyer's artifact list in Figure 2. Arrowheads found on the current Portland Water Bureau property. Ernest found these artifacts while plowing, tilling, and farming the ~40 acres between 1930s and 1970s.



Figure 4g. Inventory #6 on Ernest Meyer's artifact list in Figure 2. Arrowheads found on the current Portland Water Bureau property. Ernest found these artifacts while plowing, tilling, and farming the ~40 acres between 1930s and 1970s.

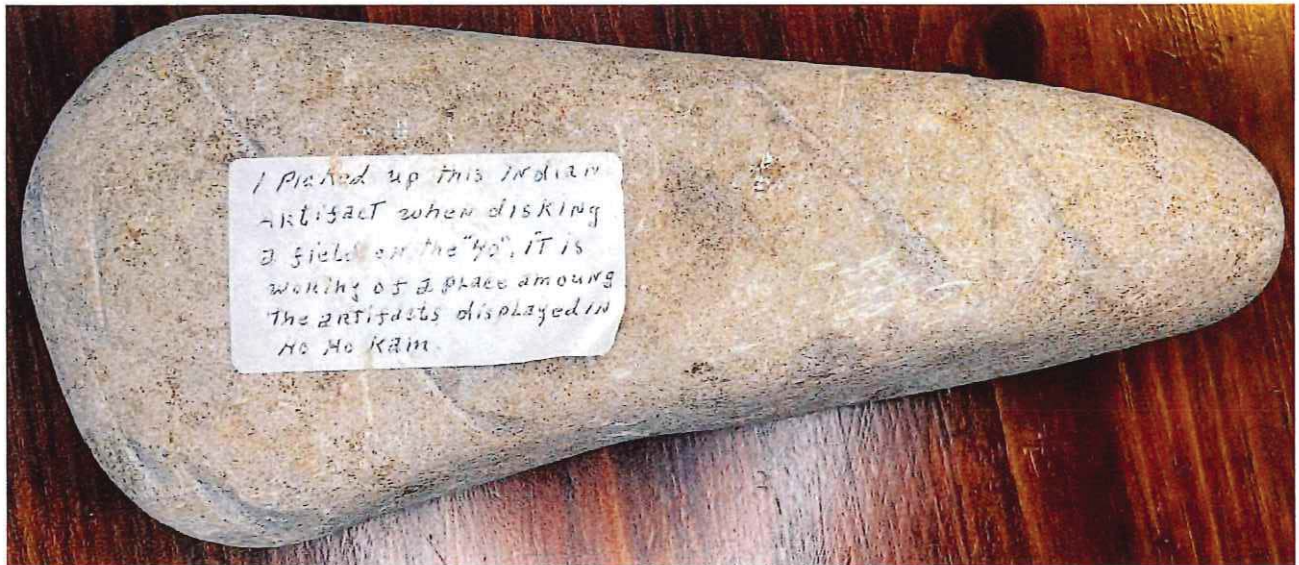


Figure 5. Artifact found on the current Portland Water Bureau property. Ernest found this while "discing" the ~40 acre farmland between 1930s and 1970s.

Annell Carlson Interview 06/14/2023

Interview conducted by Patricia Fiedler

Present During Interview: Annell Carlson, Patricia Fiedler

The Carlson Farm (now Carlson Nursery, Inc) is located at 32627 SE Lusted Rd, Gresham OR 97080. The finished water pipeline from the proposed water filtration plant is planned to run in front of Carlson Nursery.

Annell Carlson's family has owned this property since 1905. Four generations have farmed this property. The property was purchased in 1905 by Gustaf and Mathilda Carlson and later owned by Harry Carlson (Second Generation), Bob and Annell Carlson (3rd generation), and Jim Carlson (4th generation). Annell lives in the home she and Bob built in the 1960s. Her son Jim is the fourth generation farmer and lives in the original home.

The Carlson Farm was originally 40 acres. In September 2005, the Carlson Farm/Nursery was recognized as a Century Farm. It didn't farm nursery stock until the 1950's. Throughout the decades of farming, the family consistently found Native American artifacts on their property as they worked the land for berry farming.

A Century of Farming

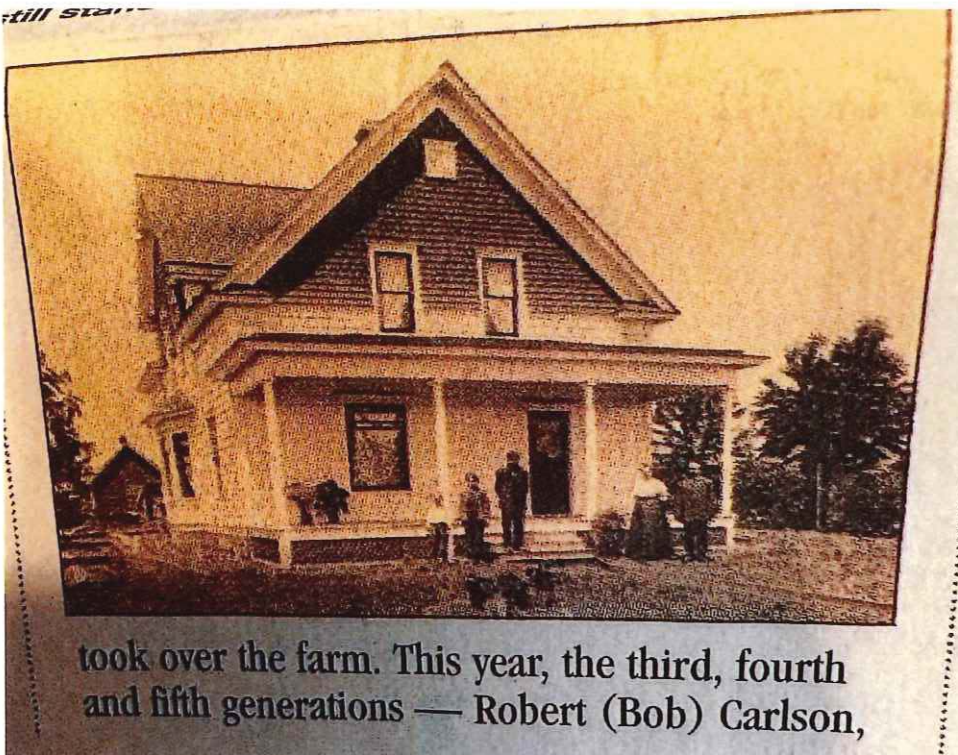
Three generations of Carlsons celebrate nursery's milestone



STAFF PHOTO BY CAROLE ARCHER

Above: Bob Carlson sits on a 1945 tractor with his family, from left to right, granddaughters, Karen, 12, Kalle, 9, daughter-in-law Susan Carlson, wife Annell Carlson, grand-daughter Kristen, 5, and son, Jim Carlson, on the 40 acres the family has owned and operated since 1905. Below: The original Carlson farmhouse still stands on the property (contributed photo).

Picture of the Bob Carlson family on the front page of the Gresham Outlook.



took over the farm. This year, the third, fourth and fifth generations — Robert (Bob) Carlson,

Carlson farmhouse built in 1960.



Artifacts gathered from the Carlson Farm property between 1905 and 1960.



Artifacts gathered from the Carlson Farm property between 1905 and 1960. Photo is an aerial view of the Carlson Farm.



Artifacts gathered from the Carlson Farm property between 1905 and 1960. Photos show construction of the farmhouse to be completed in 1960.