

Reiss-Landreau Research
Archaeology and Historic Preservation Consulting
PO Box 2215 Yakima WA. 98907 Phone/Fax (509) 952-5130, 498-9818
chrislandreau@charter.net

Gretchen Kaehler, Local Government Archaeologist
Office of Archaeology and Historic Preservation
1063 S. Capitol Way, Suite 106
P.O. Box 48343
Olympia, Washington 98504-8343

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Letter in response to Log: 060310-05-KT

RE: Archaeological Review and Inventory of the City Heights Development Project, Cle Elum, Kittitas County, Washington

Reiss-Landreau Research was asked to discuss the potential eligibility of 45KT1960, and 45KT3054, as contributory to the national register status of either the No. 5 mine, or the No. 7 mine as a whole, or individually, as well as the No 7 mine location boundaries.

The two properties (45KT1960, and 45KT3054) in question are principally piles of industrial slag from the excavation and processing of coal. Large spoil piles from the Cle Elum mines are relatively common, although the 45KT1960 site from the No. 7 mine is moderately large, and isolated from other piles. 45KT1960 also has a small well- worn jeep trail leading away north of it that may have at one time been part of the rail dump system of the mines. The 45KT3054 site is a series of piles deposited from the No. 5 mine.

Both properties are singular features, and can be seen as **components** of the mines from which they were extracted. The features are not *of themselves* likely eligible to the National Register of Historic places, given that they do not meet any of the four eligibility criteria in isolation.

*a. that are **associated with events** that have made a significant contribution to the broad patterns of our history; or*

*b. that are **associated with the lives of persons** significant in our past; or*

*c. that **embody the distinctive characteristics** of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and*

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Archaeology and Historic Preservation Consulting
1103 S. 32 Ave Yakima WA. 98902 Phone/Fax (509) 952-5130, 453-4145
chrislandreau@charter.net

*distinguishable entity whose components may lack individual distinction;
or*

*d. that have yielded, or may be likely to yield, information important in
prehistory or history.*

There is little question that both the No. 5 and No. 7 mines themselves are likely eligible to the national register of historic places, both for their local importance to the development of the Cle Elum community, for locally important personages, and for information that the mines may provide about mining techniques of that period. In other words they have potential under criteria a, b, and d.

However, the question for this project specifically, is; are these slag piles contributing components to the potential eligibility of either mine.

Are they functionally or contributionally unique? No. In terms of examples of slag piles, there are a significant number of piles north of 45KT1960, and 45KT3054, which will not be impacted by this project. Indeed, as they have been recorded to standard site forms and entered into the permanent archive of DAHP in Olympia, the details of their existence has been documented.

Do they provide information critical to our understanding of the mines, and in their absence would the mines be eligible to the national register: No, the mines themselves with all of their constructed components and associated material remains are potentially eligible, with or without some of the ubiquitous slag deposits.

In fact, we must argue that the slag piles, and the small (possible) road bed feature, are not contributory to the national register eligibility of either mine. The piles are not the result of careful human construction, but rather convenient dumping spots for post industrial detritus. Indeed, the mines themselves, both located away from the City Heights project, do not lose any of their potential eligibility through the loss of either slag pile.

Therefore, aside from the clear aesthetic improvement, our final recommendation is to allow the removal of the slag piles related to the mining of coal from the No. 5 and No. 7 mines in Cle Elum. They are not seen as significant contributing elements to the national register eligibility of either mine. To extrapolate from this point, if the features are not contributory to the National Register status of either mine, they must therefore be unlikely to contribute to a National Register Historic District, regardless of the differences in the criteria.

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Finally, Mine No. 7 is clearly listed as located north of the City Heights project area on topographic maps and aerial photography. Shafts from No. 5 and No. 7 have been documented to run under the entire city of Cle Elum, and are available on any number of salient mining surveys. However, those shafts that run deep below the surface are not going to be impacted by this project, and were not part of the original cultural inventory.

Thank you for your consideration,

Christopher Landreau
Principal Investigator
Reiss-Landreau Research