



DUWAMISH TRIBE

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8/13/2024

Department of Community and Economic development
LUA 24-000202

Dear Jill Ding,

Thank you for the opportunity to comment on the Ion Renton LLC Demolition Environmental Review, for the project located at 500 Park Ave N / 535 Garden Ave N in Renton. The Duwamish Tribe understands that the project is located within an Urban Center and involves removing the two existing buildings and the sky bridges that connect each building to the on-site multi-story parking garage. In addition, a "fitness area" located within the footprint of the parking garage will be removed, however, the parking garage itself will remain intact. Based on the information provided and our understanding of the project and its APE, the Duwamish Tribe would recommend an inadvertent discovery plan, especially if any groundbreaking activity occurs below fill, topsoil or other impervious surfaces into native soil. This is an area that the Duwamish Tribe considers culturally significant and has a high probability to have unknown archaeological deposits. We note that there are 16 historical and ancestral Duwamish place names within about 1.5 miles of the project location. The DAHP WISAARD predictive model indicates that an archaeological survey is highly advised with a very high risk for encountering cultural resources.

We request that if any archaeological work or monitoring is performed, we would like notification. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance. The Tribe would also like the opportunity to be present if or when an archaeologist is on site.

In addition, the Tribe strongly recommends only native vegetation be used for any proposed landscaping to enhance habitat for fish and wildlife, and native avian life and native pollinators. The Tribe supports observing critical area tracts and stream buffers to preserve any remaining wetlands and stream buffers. Loss of wetland habitat is known to affect the viability of fish, water quality and increase the effects of seasonal urban flooding.

We also strongly recommend that mature native trees in the APE are preserved. Mature trees can be of profound cultural significance to the Duwamish Tribe and provide innumerable benefits for people, climate, and wildlife. If a tree is suspected to be culturally modified, the Duwamish Tribe would like to be notified and would like the opportunity to come to the site to ensure its protection.

Finally we request that any lighting be [dark sky compliant](#) to reduce light pollution. Darkened skies were favorable conditions to practice traditional life pathways.

Thank you,

Aimee Antuna - Toledo
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