

**CULTURAL RESOURCES ADDENDUM MEMO
FOR THE AVENUE 55, LLC DUPONT WEST PROJECT
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON**

Prepared for:

Avenue 55, LLC
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Prepared by:

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NATURAL
INVESTIGATIONS
COMPANY

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October 2023

EXECUTIVE SUMMARY

DuPont Industrial Partners, LLC in 2011 proposed the development of approximately 25.3-acres of private land at 1700 Center Drive in the City of DuPont, Pierce County, Washington. The parcel of land proposed for development is identified as Lot Y, Assessor's Property Tax Parcel No. 011926-2019. DuPont Industrial Partners, LLC had proposed construction of a multi-building industrial park on Lot Y that included a maximum of twelve 12 buildings, parking spaces, roadways, installation of underground utilities, and construction of a trail along Sequallitchew Creek to the south of the proposed development. Parus Consulting, Inc. (PCI) was retained by DuPont Industrial Partners, LLC to conduct cultural resources investigations to facilitate construction of the project and comply with all Washington State Department of Archaeology & Historic Preservation (DAHP) regulations and the State Environmental Protection Act (SEPA). However, DuPont Industrial Partners, LLC did not construct any buildings or develop Lot Y.

Avenue 55, LLC is currently proposing to develop a section of Lot Y, defined as: Lot 1, which is 17.72 acres and 1.93 acres in Lot 2, totally 19.65, that was originally part of DuPont Industrial Partners, LLC proposed 2011 development. Avenue 55, LLC proposes to construct a warehouse distribution facility, parking spaces, and associated underground utilities on approximately 19.65 acres of Lot Y west of Sequallitchew Road, that they are now calling DuPont West. Avenue 55, LLC retained Natural Investigations Company, Inc. (Natural Investigations) to review PCI's report and present any new findings and/or recommendations to facilitate construction of the new project on Lot Y and comply with all state regulations (e.g., DAHP and SEPA) for the identification and protection of cultural resources. The purpose of this addendum is to present the results of Natural Investigations review of PCI's 2011 report and its findings, including any changes to the report or findings and/or any new recommendations for the protection of cultural resources.

PCI conducted cultural resources investigations for the proposed originally project on Lot Y in 2011. The investigations included a pedestrian survey and excavation of 125 shovel test probes and 22 geotechnical exploration pits. PCI's cultural resources investigations were conducted under Archaeological Excavation Permit (Permit) No. 2010-54 approved by the DAHP on February 7, 2011 and were monitored by a member of the Nisqually Tribe.

PCI's pedestrian survey and excavations did not identify any evidence of previously recorded sites and isolates on Lot Y including sites 45PI66, the site of a Methodist Episcopal Mission and 45PI455, the site of a 9th U.S. Cavalry Bivouac, and a flaked stone isolate, 45PI773. In addition, PCI cultural resources investigations confirmed previous reports that two sites 45PI63, Railroad Dump #3, and 45PI64, Burning Ground Dump, formerly located on Lot Y were completely destroyed/removed over twenty years ago as part of hazardous materials remediation across Lot Y. PCI did identify two new historic sites, 45PI01224, a segment of railroad track, and 45PI01225, a concrete platform and one isolated kerosene can on Lot Y.

Sites 45PI455 and 45PI66 were previously determined eligible for the National Register of Historic Places (NRHP) at 36 Code of Federal Regulations (CFR) Part 60.4 [a-d] under Criterion A because of their association with significant events in history, but there are no extant remnants of the sites on Lot Y. Sites 45PI01224 and 45PI01225 are not in the section of Lot Y currently proposed for development and do not meet any of the eligibility criteria for inclusion on the NRHP or the Washington Heritage Register (WHR) as described in Revised Code of Washington (RCW) 27.34.200. Consequently, PCI determined that no historic properties would be affected by development of Lot Y and because of the archaeological sensitivity of the area also recommended and prepared an Unanticipated Cultural Resources Discovery Plan for the project. PCI's report was filed with the DAHP and sent to the appropriate Tribes.

Natural Investigations reviewed PCI's 2011 report and the results of their cultural resources investigations. The cultural resources investigations and findings presented in the report for development of Lot Y are adequate and remain valid for Avenue 55, LLC's currently proposed project, DuPont West. Indeed, reduction in the size of the current project places sites 45PI01224 and 45PI01225 outside project

boundaries. Therefore, Natural Investigations confirms the findings presented in PCI's 2011 report, does not recommend any additional investigations, and pursuant to DAHP regulations and SEPA Checklist Section B, Number 13, determines that construction of the project currently proposed by Avenue 55, LLC would not affect any historic properties (i.e., properties eligible for or listed on the NRHP) or properties that could be eligible for the WHR.

TABLE OF CONTENTS

Executive Summary	ii
Introduction.....	1
Project Location and Description	1
Regulatory Setting	1
Report Addendum Preparation	1
Research Methods and Findings.....	7
Survey.....	8
Excavations	8
Surface Survey Results	10
Subsurface Testing Results	10
Geotechnical Subsurface Exploration Results	11
Conclusions and Recommendations	11
References Cited.....	13

LIST OF TABLES

Table 1. Previous Studies on or near Lot Y	7
Table 2. Previously Recorded Sites on Lot Y	8

LIST OF FIGURES

Figure 1. Project Location Map	3
Figure 2. 2022 Project Site Plan.....	4
Figure 3. Archaeological Resources and Remediation Map	5
Figure 4. Subsurface Testing Map	9

LIST OF APPENDICES

APPENDIX A: Archaeological Survey, Testing, and Monitoring at 45PI66, 45PI455 and 45PI773, DuPont Industrial Partners, LLC, Lot Y Project, City of DuPont, Pierce County, Washington. Report prepared by Parus Consulting, Inc. 2011

INTRODUCTION

DuPont Industrial Partners, LLC in 2011 proposed the development of approximately 25.3-acres of private land at 1700 Center Drive in the City of DuPont, Pierce County, Washington. The parcel of land proposed for development is currently identified as Lot Y, Assessor's Property Tax Parcel No. 011926-6005, 011926-6006, and 011926-6007. DuPont Industrial Partners, LLC proposed construction of a multi-building industrial park on Lot Y that included a maximum of twelve 12 buildings totaling approximately 340,000 square feet of building space, roadways, loading areas, approximately 650 parking spaces, installation of underground utilities, and construction of a trail along Sequelitchew Creek to the south of the proposed development. PCI was retained by DuPont Industrial Partners, LLC to conduct cultural resources investigations to facilitate construction of the project and comply with all DAHP regulations and SEPA. However, DuPont Industrial Partners, LLC did not construct any buildings or develop Lot Y.

Avenue 55, LLC is currently proposing to develop part of Lot Y that was originally part of DuPont Industrial Partners, LLC proposed 2011 development. Avenue 55, LLC retained Natural Investigations to review PCI's report and present any new findings to facilitate construction of the new project on Lot Y and comply with all state regulations (e.g., DAHP and SEPA) for the identification and protection of cultural resources. The purpose of this addendum is to present the results of Natural Investigations review of PCI's 2011 report and its findings, including any changes to the report or findings and/or any new recommendations for the protection of cultural resources.

PROJECT LOCATION AND DESCRIPTION

Avenue 55, LLC proposes to develop an approximately 19.65 acres parcel of land identified as Lot Y, Assessor's Property Tax Parcel No. 011926-6005, 011926-6006 in the City of DuPont, Pierce County, Washington (Figure 1). The proposed development includes construction of one warehouse distribution facility totaling approximately 256,800 square feet, 141 parking spaces, 44 trailer stalls, a 27,130 square foot storm pond located in the southwest corner of Lot 1, public trails along the southern border, and associated underground utilities west of Sequelitchew Road (Figure 2).

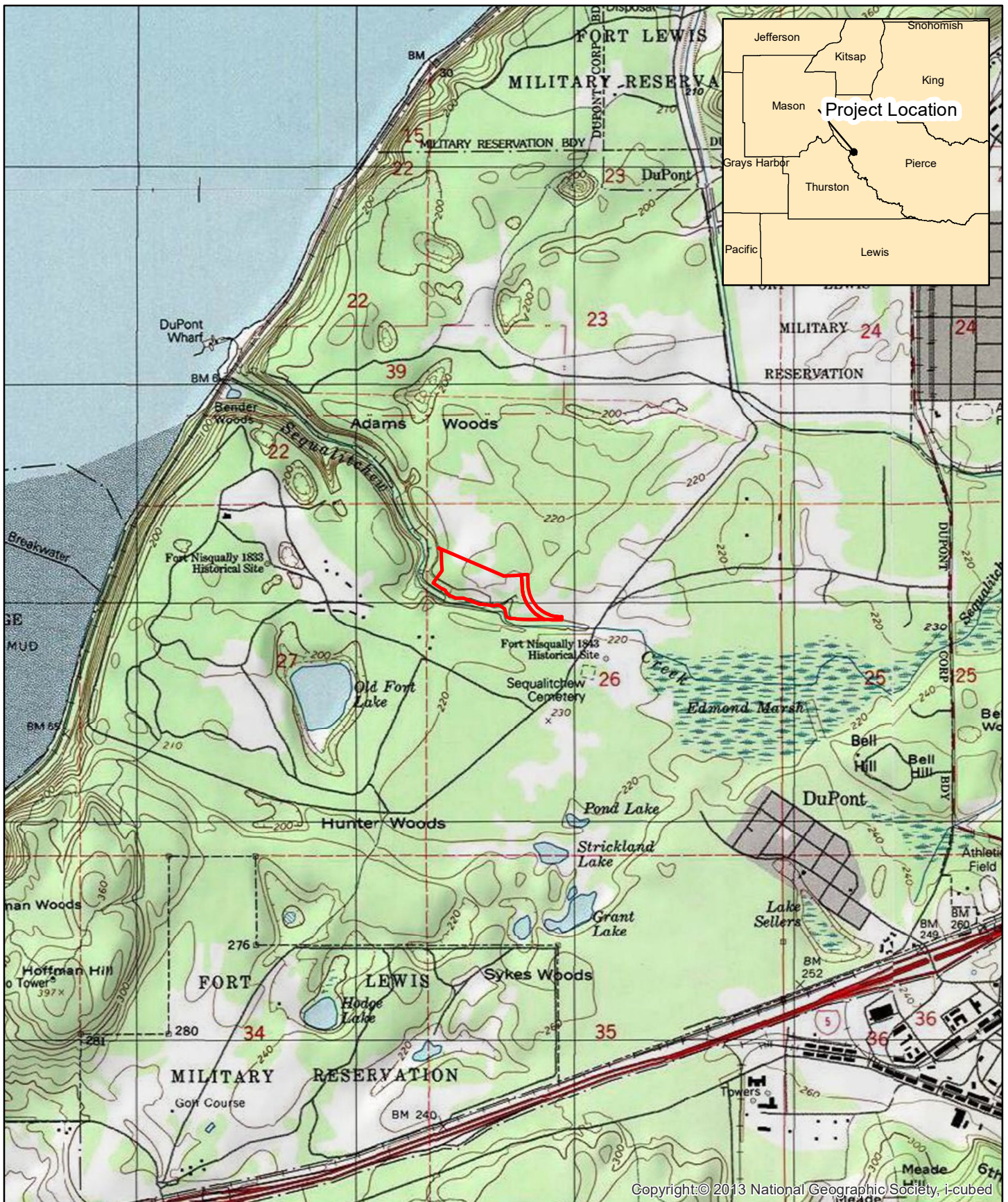
REGULATORY SETTING

There is no federal involvement in the project as currently proposed. PCI's and Natural Investigations cultural resources investigations for the proposed project were conducted under prevailing Washington state laws that protect cultural resources (e.g., prehistoric archaeological sites, historic sites, historic buildings, and Native American sites and graves). These laws include Executive Order 05-05 (currently revised as Executive Order 21-02), Indian Graves and Records (RCW 27.44), Archaeological Sites and Resources (RCW 27.53), Archaeological Excavation and Removal Permit (Washington Administrative Code [WAC] 25-48), and Discovery of Human Remains (RCW 27.44). In addition, PCI obtained a permit to conduct cultural resources investigations including excavations within boundaries of known archaeological sites. The Permit (No. 2010-54) was completed pursuant to requirements at WAC 25-48-060.

REPORT ADDENDUM PREPARATION

John A. Nadolski, MA was the Principal Investigator for this project and is primary author of this report addendum. Mr. Nadolski has more than thirty-five years of experience in archaeology and exceeds all

requirements of the *Secretary of Interior's Qualifications Standards* (36 CFR Part 61; National Park Service 1983) and the DAHP. The format of this report addendum follows DAHP guidance.



Study Area

0

0.5

1

Kilometers

0

0.5

1

Miles



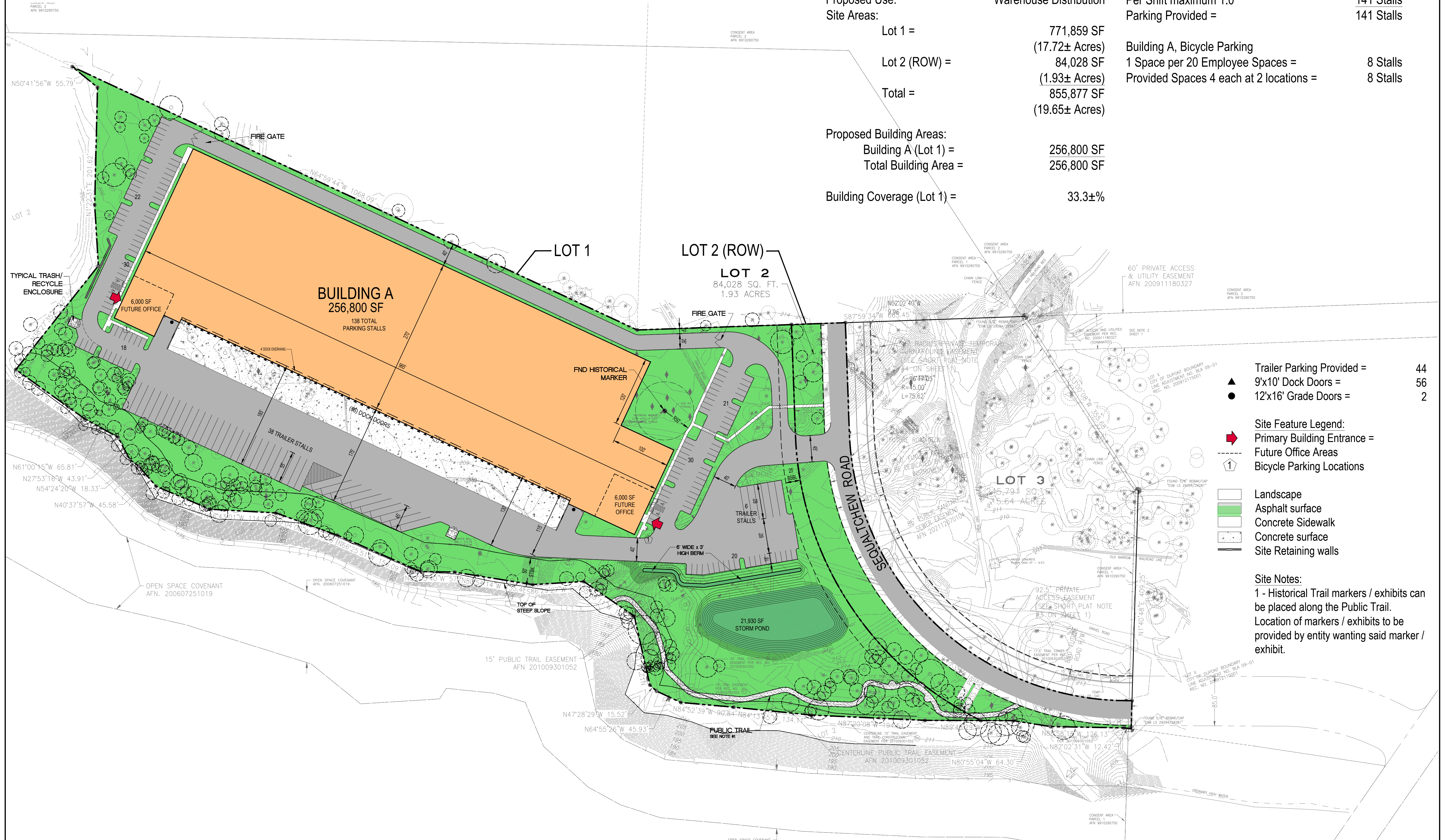
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DuPont West Project
Figure 1 - Project Location



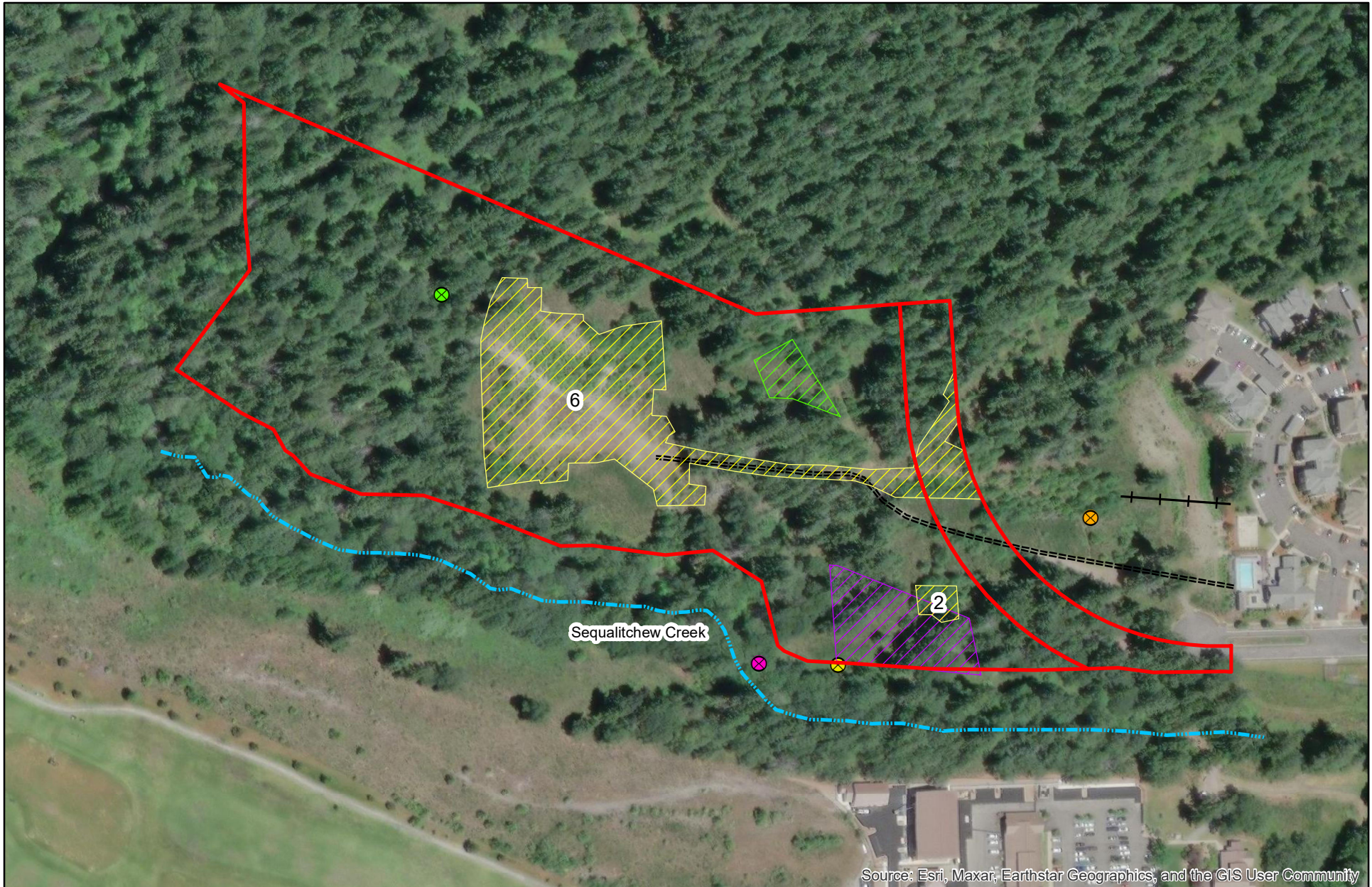
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Site Address:	1700 Center Drive	Parking Analysis	
	Dupont, WA	Building A, Assumes 12,000 SF Future Office	
Parcels:	011926-2019	Total 256,800 SF	
Zoning:	Manufacturing and Research (MRP)	Per Shift minimum 0.3	43 Stalls
Proposed Use:	Warehouse Distribution	Per Shift maximum 1.0	141 Stalls
Site Areas:		Parking Provided =	141 Stalls
Lot 1 =	771,859 SF		
	(17.72± Acres)	Building A, Bicycle Parking	
Lot 2 (ROW) =	84,028 SF	1 Space per 20 Employee Spaces =	8 Stalls
	(1.93± Acres)	Provided Spaces 4 each at 2 locations =	8 Stalls
Total =	855,877 SF		
	(19.65± Acres)		
Proposed Building Areas:			
Building A (Lot 1) =	256,800 SF		
Total Building Area =	256,800 SF		
Building Coverage (Lot 1) =	33.3±%		



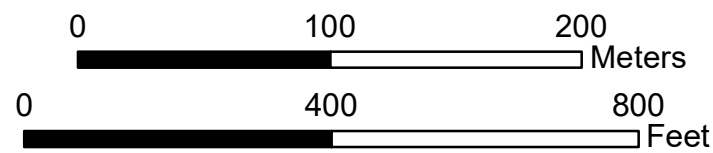
Scale: 1" = 80'

NOTE:
SITE BOUNDARY AND SURVEY PROVIDED BY
BARGHAUSEN CONSULTING ENGINEERS, INC.
DATED 06/05/2018. RECEIVED 01/22/2022.



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

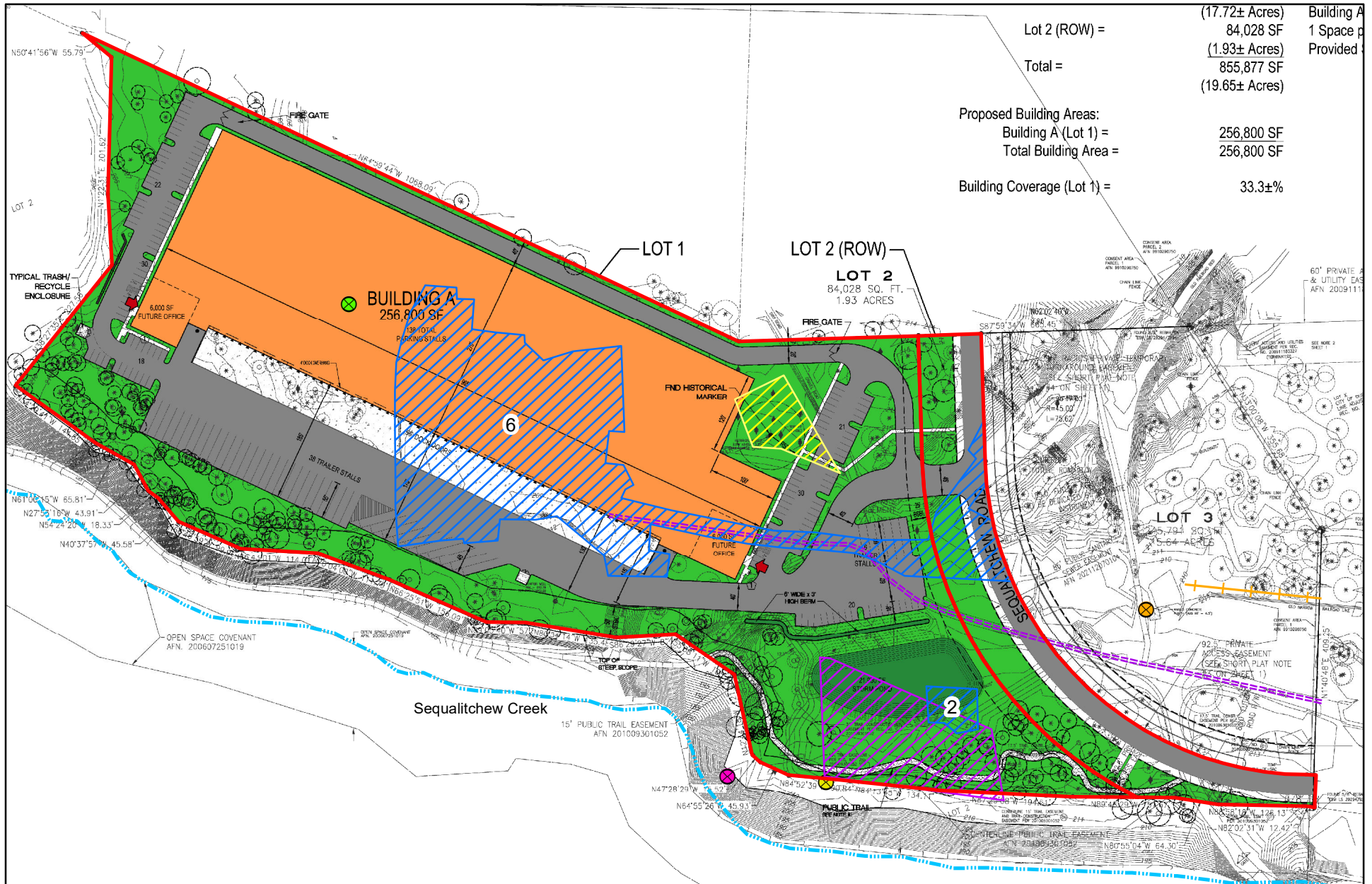
- | | |
|----------------------|----------------------|
| DuPont West Boundary | 45-PI-01226 |
| Hot Spot Excavations | 45-PI-00064 |
| 45-PI-66 | 45-PI-01225 |
| 45-PI-455 | 45-PI-01224 |
| 45-PI-773 | Existing Gravel Road |



DuPont West Project
Figure 3:
Archaeological Resource and Remediation



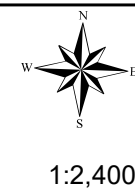
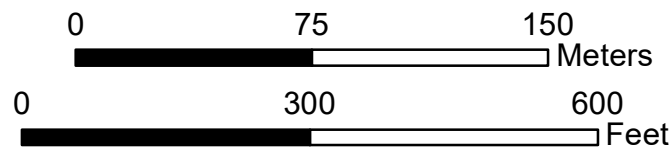
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Lot 2 (ROW) =	(17.72± Acres)	Building A
	84,028 SF	1 Space p
	(1.93± Acres)	Provided
Total =	855,877 SF	
	(19.65± Acres)	

Proposed Building Areas:	
Building A (Lot 1) =	256,800 SF
Total Building Area =	256,800 SF
Building Coverage (Lot 1) =	33.3±%

Lot Y Boundary	45-PI-01226
Hot Spot Excavations	45-PI-00064
45-PI-66	45-PI-01225
45-PI-455	45-PI-01224
45-PI-773	Existing Gravel Road



DuPont West Project
Figure 3A:
Archaeological Resource and Remediation

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RESEARCH METHODS AND FINDINGS

PCI conducted a cultural resources records search for the project on October 21, 2010 using the DAHP electronic GIS database to identify previously recorded sites and previously conducted surveys on and near Lot Y (Tables 1 and 2). PCI also conducted tribal consultation (i.e., cultural representatives or Tribal Historic Preservation Officers for the Nisqually, Puyallup and Squaxin Tribes were contacted regarding the project), a pedestrian survey, subsurface testing, and monitoring of geotechnical subsurface exploration on Lot Y in February and March 2011. All PCI investigations were conducted under DAHP Permit No. 2010-54.

Table 1. Previous Studies on or near Lot Y

Year	Author(s)	Report Title	Proximity to Lot Y
1977	Onat, A.R., Lee A. Bennett, and Timothy Riordan	Cultural Resources Survey: DuPont Site, Volume I, Survey of Archaeological and Ethnographical Resources at the DuPont Site	Within and near Lot Y
1977	Stratton, David H., and Glen W Lindeman	Cultural Resource Survey, DuPont Site, Volume II: Survey of Historical Resources at the DuPont Site	Within and near Lot Y
1989	Welch, Jeanne	A Cultural Overview and Comprehensive Management Plan for the DuPont Property, Pierce County, Washington	Within and near Lot Y
1990	Stilson, M. Leland	A Data Recovery Study of 45PI401, Hudson's Bay Dwellings at Northwest Landing, Pierce County, Washington	0.1 mile east
1991	Moura, Guy F.	Missions, War Games, and Railroad Dumps: 1989 Explorations and Excavations, Northwest Landing, DuPont, Washington	Within
1991	Stilson, M. Leland	A Data Recovery Study of 45PI405, the 1843 Fort Nisqually Village at Northwest Landing, Pierce County, Washington	0.1 mile east
2000	Daugherty, Richard, and Mary Condon	Archaeological Monitoring of the "Hot Spot" Removal Program, the Hazardous Waste Stockpile Areas, and Sand Stockpile Laydown Areas at the Former DuPont Works Site, DuPont, Washington	Within
2001	Daugherty, Richard, and Mary Condon	An Update on the Archaeological Status of Sites 45PI63 (A Trash Dump Located Along a Railroad Spur), 45PI64 (Burning Ground Dump), 45PI66 (Methodist Episcopal Mission), and 45PI455 (Part of the 9th Cavalry Bivouac Area)	Within and near Lot Y
2002	Maass, Alex	Interim Archaeological Monitoring Report for the Former DuPont Works Site, Parcel 1	Adjacent (to west)
2003	Maass, Alex	2002 Field Season Archaeological Monitoring Report for the Former DuPont Works Site, Parcel 1	Adjacent (to west)
2003	Wessen, Gary	Exploring the Boundary and Possible Interpretation of 45PI485	South of creek
2004	Wessen, Gary	Archaeological Testing at 45PI576, Former DuPont Works Site, City of DuPont, Pierce County, Washington	South of creek
2005	Dampf, Steven	Archaeological Monitoring Report for the 2003 and 2004 Field Seasons at the Former Dupont Works Site Parcel 1, City of DuPont, Pierce County, Washington	Adjacent (to west)
2005	Wessen, Gary, Cathy Bialas and Gail Thompson	Cultural Resources Assessment for the Glacier Northwest North Sequelitchew Creek SEIS Project, City of DuPont, Pierce County, Washington	Within and near Lot Y
2006	Thompson, Gail	Archaeological Implementation Report for Remediation of Soils at the Former DuPont Works Site Parcel 1, City of DuPont, Pierce County, Washington	Adjacent (to west)
2008	Wessen, Gary, Cathy Bialas, Derek Shaw and Gail Thompson	Revised Cultural Resources Assessment for the Glacier Northwest North Sequelitchew Creek SEIS Project, City of DuPont, Pierce County, Washington	Within and near Lot Y

Table 2. Previously Recorded Sites on Lot Y

Site No.	Brief Description	Recorded By/Year	Prior Reports	NRHP Eligibility
45PI00063	Historic debris deposit, two loci along railroad, 1910- 1930; removed during soil remediation	Riordan, 1977; Daugherty, 1993 NRHP form	Blukis Onat et al., 1977; Welch, 1989a; Moura, 1991a; Daugherty and Condon, 2001	Not eligible
45PI00064	Historic DuPont Powder Works burning ground dump, 1930s-1945; removed during soil remediation	Riordan, 1977; Daugherty, 1993 NRHP form	Blukis Onat et al., 1977; Welch, 1989a; Daugherty and Condon, 2000, 2001	Not eligible
45PI00066	Historic 1840-1842 Methodist Episcopal Mission	Riordan, 1977; Daugherty, 1993 NRHP form	Blukis Onat et al., 1977; Welch, 1989a; Moura, 1991a; Daugherty and Condon, 2000, 2001	Eligible, included in proposed Nisqually- Sequelitchew Historic District
45PI00455	Historic 9th U.S. Cavalry Bivouac, Camp Nisqually, 1904; partially removed during soil remediation	Daugherty, 1997; Daugherty, 1997 NRHP form	Moura, 1991a, 1991b; Daugherty and Condon, 2000, 2001	Potentially eligible, included in proposed Nisqually- Sequelitchew Historic District
45PI00773	Prehistoric chipped stone isolate	Wessen, 2005	Wessen et al., 2005, 2008	Not eligible

SURVEY

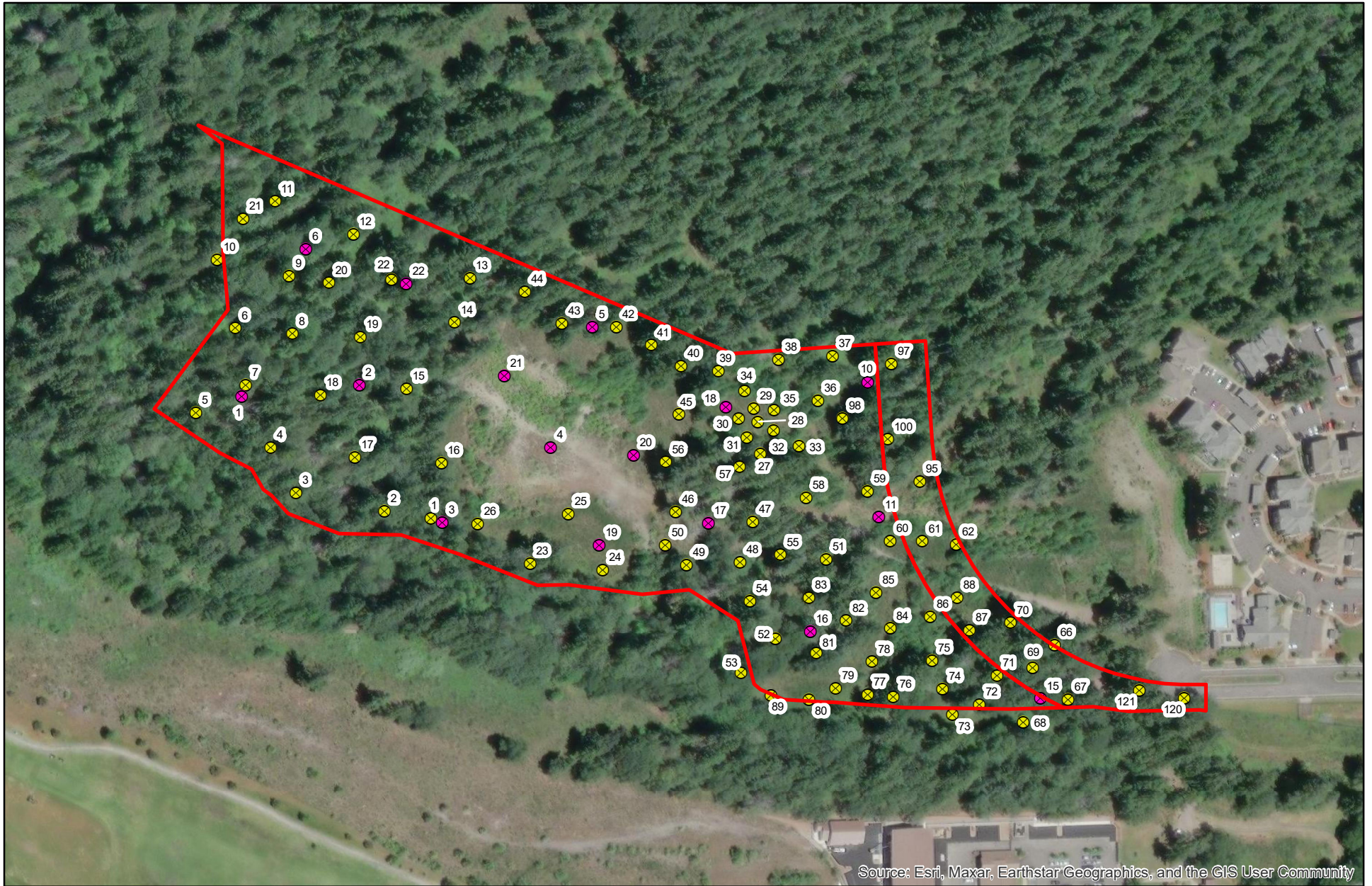
PCI conducted a pedestrian surface survey across the original 25.3-acre original project area. Transect spacing was no greater than 15 meters apart and survey was accomplished on an east-to-west bearing.

EXCAVATIONS

Following the pedestrian survey, 125 shovel test probes (STPs) and 22 geotechnical excavations (GTEs) were excavated across Lot Y at random intervals as shown on Figure 4. At the request of the City of DuPont and the DAHP, no STPs were placed in existing trails, pedestrian paths, or gravel roadways. Additionally, all STPs were backfilled and compacted daily. The STPs and GTEs were excavated using a backhoe with a 2-foot bucket attachment and smooth plate. The excavation of the STPs and GTEs totaled approximately 450 cubic meters of soil.

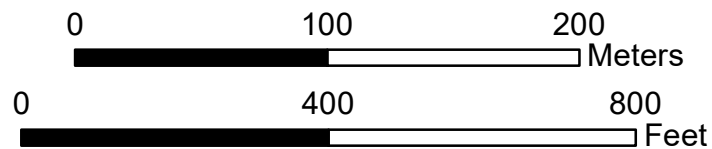
Each of the 125 STPs measured 3 feet in length and 2.5 feet in width. STP levels were dug in 7-cm (3-inch) increments or until sterile gravels were encountered. Soils taken from the STPs were screened through 1/8-inch hardware cloth. No STPs were placed in three hot spots, HS-3, HS-4, and HS-6, that include the former locations of sites 45PI00063 and 45PI00064 where prior soil remediation efforts removed contaminated soils and where sterile gravel is now exposed across these areas of Lot Y (Figures 2 and 4). Sterile gravel was encountered in 123 of 125 STPs between 35 and 130 centimeters below the surface (cmbs) (1.1-4.3 feet) and mixed stratigraphy or fill was present in two STPs. Records for the individual STPs, detailing levels, soil texture, color, and comments are included in Appendix C of PCI's 2011 report included as Appendix A of this memo.

Each of the 22 GTEs measured 3 feet wide by 5 feet long. GTE upper levels were dug in 3-inch (7 centimeter) increments or until sterile gravels were encountered. Lower levels of the GTEs, after encountering sterile gravels, were dug in 1-foot increments. Four of the GTEs were excavated in hot spot removal areas (Figures 2 and 4). Soils taken from the GTEs at 4 feet, 6 feet, and 10 feet were screened through 1/8-inch hardware cloth. Twenty GTEs were excavated to 305 cmbs (10 feet); one GTE with mixed stratigraphy was terminated at 250 cmbs (8.2 feet); one GTE filled with water at 244 cmbs (8 feet). Records for the individual GTEs, detailing levels, soil texture, color, and comments, are included in Appendix C of PCI's 2011 report included as Appendix A of this memo.



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

- DuPont West Boundary
- ✕ Geotechnical Excavation
- Shovel Test probe



DuPont West Project
Figure 4: Subsurface Testing Map



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Surface Survey Results

All undeveloped ground surface areas in the boundaries of Lot Y were examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, fire pits, soil depressions, and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic debris (e.g., metal, glass, ceramics). Ground disturbances, including a graveled dirt road and dirt two-track, were visually inspected.

Surface survey did not identify any remnants of sites 45PI00063, 45PI00064, 45PI00455, or isolate 45PI00773. Survey did identify two brick fragments at the recorded location of site 45PI00066, three new historic sites, and a historic isolate. The three sites include 45PI01224, a segment of a previously identified narrow-gauge railroad track and grade, 45PI01225, a concrete railroad loading platform, and 45PI01226, a set of railroad bridge abutments. The isolate, 45PI00064, is a galvanized kerosene can. Only the isolated kerosene can, 45PI00064, is in the new Avenue 55, LLC project boundaries. No artifacts were collected. PCI archaeologists completed the appropriate Washington Archaeological Site Inventory and Isolate forms for all archaeological materials identified during the survey.

Subsurface Testing Results

The subsurface stratigraphy was consistent in 123 of the 125 STPs and all 22 GTEs excavated in the boundaries of DuPont West (Figure 4). The soil throughout the project area is consistent with the description for the Spanaway series developed on glacial outwash sediments. There are three soil horizons, though horizon 2 is not present in all STPs or GTEs. The depth of the horizons varies across the Lot Y landscape in relation to the topography and prior human disturbance. Horizon 1 is a moist, very dark brown (10 YR 2/2) gravelly sandy loam with weak fine granular structure; soft, very friable, nonsticky and nonplastic; many fine roots with a very high organic matter content. Horizon 2 is a moist very fine crumb dark gray brown (10 YR 3/2) gravelly sandy loam with little distinction in texture from horizon 1. Horizon 3 is moist and fluctuates between a dark gray brown (2 YR 4/2) and an olive brown (2YR 4/4) gravelly sand with no soil matrix. The single grained, loose sand is the prominent content with some rounded to sub-rounded cobbles; it is also very compact.

Only two of the subsurface units (STPs 28 and 115) contained cultural material. A brick fragment, measuring 3x4x2 inches, was located at 20 cmbs (8 inches) in STP 28 within site 45PI66 (Methodist Episcopal Mission). The brick was not handmade and no maker's marks were located on the fragment. Additionally, a smaller brick fragment was located at ground level within inches of STP 35 (also within 45PI66). STP 115 is located 18.5 feet due east of a concrete platform and the soil is entirely mixed down to a level of 200 cmbs (6.6 feet). A flat iron bar with four bolts protruding was located at 160 cmbs (5.2 feet). The iron bar measured 24 inches long by 3 inches wide and 1/8th inch thick, and has four 3.5-inch metal bolts spaced roughly 7 to 8 inches apart. The iron bar appears to be associated with the concrete platform, given its close proximity and the paint on the bolt heads matches the metal on the platform.

All but two of the 125 STPs (STP 89 and 115) were excavated until sterile gravel was encountered. Although the presence of the Spanaway series soil horizons was consistent, the depth of sterile gravel varied from 35 cmbs to 130 cmbs (1.1-4.3 feet) across Lot Y. STP 115 had mixed stratigraphy and was excavated to a depth of 200 cmbs (6.6 feet). The soil in STP 89 is a moist, brown (7.5 YR 4/4) silty loam until the typical underlying horizon appears at 110 cmbs (3.6 feet) as a moist, dark green brown (2.5 YR 4/4) gravelly sand. The typical upper horizon of gravelly sandy loam appears to have been removed near STP 89 and replaced with imported soil. The STP was placed 66 feet northeast of the set of bridge abutments. It seems likely that more stable soil was imported for the approach to the narrow-gauge bridge that once crossed Sequalitchew Creek.

Six of the STPs located in the eastern portion of the project (STPs 113, 116-119) near the gravel road display a gray upper horizon not noted in any other portion of the project area. The moist, dark gray (2.5 YR 3/1) soil is similar in structure to the typical horizon 1, but is noticeably different in color and is relatively thin (0-25 cm [0-9.8 inches]), and is likely related to prior disturbance.

STPs 120 through 125, located in the southeastern portion of the project area, all show evidence of a grass fire. Small flecks of charcoal are noted in the upper 5 cm of each unit. Of these six STPs, only STP 120 that is nearest to the creek extending to a depth of 95 cmbs (3.1 feet) and exhibited horizon 2.

In summary, only two artifacts were identified during excavation of the STPs. The two artifacts are the brick fragment recovered from STP 28 and the iron bar from STP 115. No other cultural material was identified as a result of excavation across Lot Y.

Geotechnical Subsurface Exploration Results

Twenty-two GTEs were excavated across Lot Y (Figure 4-only shows DuPont West GTEs, 16 total) to a depth of 305 cmbs (10 feet). Two GTEs, 9 and 14, were excavated to depths of 250 cmbs (8.2 feet) and 244 cmbs (8 feet), respectively. The soils throughout the GTEs are relatively consistent with the Spanaway series, although only five GTEs, 1, 3, 5, 12, 13, and 15, exhibit horizon 2. In the eastern section of Lot Y, GTE 9 has mixed stratigraphy and was excavated to a depth of 250 cmbs (8.2 feet). The upper horizon is a thin layer of sand (0-20 cmbs [0-8 inches]) followed by a mix of horizon 1 very dark brown (10 YR 2/2) gravelly sandy loam and sand with very few cobbles. It appears to be imported fill material. This unit is in close proximity to two of the hot spots, HS-3 and HS-4. In the northeastern section of Lot Y, GTE 14 was terminated at 244 cmbs (8 feet) when water entered the unit and began to fill rapidly. No cultural material was located in any of the 22 GTEs excavated across Lot Y.

CONCLUSIONS AND RECOMMENDATIONS

PCI completed an intensive-level pedestrian survey, subsurface testing (i.e., excavation of approximately 450 cubic meters of soil), monitored excavation of geotechnical exploration pits, and prepared an Unanticipated Cultural Resources Discovery Plan. PCI's investigations did not identify any evidence of site 45PI66, the Methodist Episcopal Mission, site 45PI455, a 9th U.S. Cavalry Bivouac, isolate 45PI773, a piece of chipped stone, or sites 45PI63 and 45PI64 that are reported as being destroyed as part of the hazardous materials remediation project that occurred across Lot Y. PCI did identify two new sites, 45PI1224, a segment of railroad track, and 45PI01225, a concrete platform, and isolate 45PI00064, a kerosene can.

Site 45PI66, the Methodist Episcopal Mission, is eligible for the NRHP under Criterion A for its association with significant events and also contributes to the proposed Nisqually-Sequalitchew Historic District, but the site is not eligible under Criterion D because there are no physical remains of the mission present on Lot Y. Similarly, site 45PI455, the location of the brief occupation of the area by the 9th U.S. Cavalry Buffalo Soldiers, is potentially eligible for the NRHP as a contributing element to the proposed Nisqually-Sequalitchew Historic District under Criterion A, but is not eligible under Criterion D because there are no physical remains of the bivouac area present on Lot Y. The two new sites in Lot Y, 45PI1224, a railroad track segment, and 45PI01225, a concrete platform, are recommended ineligible for the NRHP. The two isolates, 45PI773 and 45PI00064, are not eligible for the NRHP. In addition, new site 45PI01226, bridge abutments, located immediately outside the boundaries of Lot Y, is also recommended ineligible for the NRHP.

Lot Y has been extensively disturbed beginning with historic period settlement in the early 1880s, operation of the DuPont Powder Works in the early to mid-1900s (including use of part of Lot Y as a burning ground

dump from the 1930s until 1945), subsurface archaeological investigations and related artifact collection between 1989 and 2005, and environmental remediation activities in 1999 and 2000. In addition, survey and excavation by PCI did not identify any significant cultural resources. Therefore, PCI determined that no further cultural resources investigations were warranted prior to the development of Lot Y and that the development of the property would not affect any historic properties.

Regardless, the results of the literature research, local ethnographic settlement and subsistence patterns, the prehistory and history of the vicinity, and DAHP's predictive model, the project area is considered highly sensitive for prehistoric, ethnohistoric, and historic-era cultural resources. Consequently, PCI completed an Unanticipated Cultural Resources Discovery Plan for the development of Lot Y (Appendix E of PCI's report attached as Appendix A to this memo).

Natural Investigations reviewed PCI's cultural resources report titled *Archaeological Survey, Testing and Monitoring at 45PI66, 45PI455 and 45PI773, DuPont Industrial Partners, LLC, Lot Y Project, City of DuPont, Pierce County, Washington* for the currently proposed development of Lot Y by Avenue 55, LLC and

- finds that the report is adequate for the currently proposed development of DuPont West Project;
- does not recommend any additional investigations for the currently proposed project because of the scale (e.g., excavation of 450 cubic meters of soil) and nature (e.g., soils remediation) of the previous investigations conducted across Lot Y;
- concurs with the findings in the report that sites 45PI00063, 45PI00064, 45PI00455, 45PI01224, and 45PI01225 do not meet the eligibility criteria for inclusion on the NRHP or the WHR;
- finds that sites 45PI01224 and 45PI01225 are not in the boundaries of the currently proposed DuPont West project on Lot Y;
- concurs with PCI that implementation of the previously proposed project that includes areas of Lot Y currently proposed for development would not affect any historic properties as defined at 36 CFR 800, the SEPA Checklist Section B, Number 13, and the DAHP;
- recommends that the inadvertent discovery plan prepared by PCI should be updated to include current contact information for individuals and agencies identified in the plan and be implemented for the currently proposed project as recommended in PCI's 2011 report; and
- pursuant to Washington state guidance recommends that appropriate representatives of the Native American community be contacted and informed of the currently proposed project.

In summary, Natural Investigations review of PCI's 2011 report determined that previous investigations and PCI's investigations are adequate for Avenue 55, LLC's currently proposed development of DuPont West on Lot Y and implementation of the DuPont West project would not affect any historic properties as defined at 36 CFR 800 and SEPA.

REFERENCES CITED

Sikes, Nancy E., and Cindy J. Arrington

2011 *Archaeological Survey, Testing and Monitoring at 45PI66, 45PI455 and 45PI773, DuPont Industrial Partners, LLC, Lot Y Project, City of DuPont, Pierce County, Washington*. Report prepared by Parus Consulting, Inc. for DuPont Industrial Partners, LLC.

APPENDIX A:

Archaeological Survey, Testing, and Monitoring at 45PI66, 45PI455 and 45PI773, DuPont
Industrial Partners, LLC, Lot Y Project, City of DuPont, Pierce County, Washington.
Report prepared by Parus Consulting, Inc. 2011