



Ben Varin
AVENUE 55
601 Union Street, Suite 2930
Seattle, WA 98101

Greetings, Ben.

I have reviewed the Nisqually Tribe letter, dated October 21, 2024, regarding your project referenced as the Avenue 55 Lot Y project. I would ponder why the Tribe had no previous objections and/or comments on the quality of work performed during the last 13-years and has now taken issue. The Tribe appears to take issue on three accounts:

1st. The comment that the previous archaeologist in 2011 & 2023 were not qualified:

Response: All archaeologists working on the project in 2011 & 2023 exceed the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61; National Park Service 1983) and the DAHP. The author in 2011 has a Ph.D. and over 25 years' experience and is a Registered Professional Archaeologist (RPA). The archaeologists (CA & PM) that completed the survey and subsurface testing in 2011 have an M.S. and over 25 years' experience (CJ) and an M.A. and over 15 years' experience (PM) and both also hold an RPA certification. The reviewer of the 2023 report has an M.A. and over 35 years' experience. Not to mention that following the 2011 pedestrian survey, 125 shovel test probes (STPs) and 22 geotechnical excavations (GTEs) were excavated across the project at random intervals. 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 the two remaining STPs. Only two of the subsurface units contained cultural material, both were brick fragments. 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).

2nd. The Tribe believes the ethnographic sections are "woefully insufficient". The authors failed to mention "landscape that is of enduring cultural, historical, and spiritual significance to the Nisqually Tribe". The Tribe wants it recognized that "The entire City of DuPont has been constructed within the Sequelitchew Ancestral Village Landscape of Sequelitchew, a nested Traditional Cultural Property (TCP) of immense significance to the Nisqually Tribe."

Response: It is common for multiple Tribes to have overlapping ancestral territories. I will acquiesce, that to the Nisqually Tribe, their history was not as fully developed as the Puyallup Tribe in the 2011 report.

3rd. The talk about the "proposed removal of species of deep and enduring cultural and spiritual significance to the Nisqually Tribe such as Oregon white oak, Pacific yew, and Pacific madrone is an adverse cultural resource impact."

Response: These 3 species of trees are ubiquitous throughout Washington state. The project area has hundreds of trees. You cannot expect for all trees of the three species to be considered "significant cultural resources."

Respectfully submitted,

Cindy Arrington, MS, RPA
Administrator
916-765-9381
Cindy@naturalinvestigations.com