

Nisqually Point Defense Fund

P.O. Box 198, Dupont, WA 98327

December 1, 1999

Mr. Greg Moore
Weyerhaeuser Real Estate Company
1408 Palisade Blvd.
DuPont, WA 98327

Dear Mr. Moore:

Thank you for the invitation to meet and discuss the Nisqually Sequelitchew Historic District. We look forward to meeting with you on December 13th. As you know we are quite concerned about the damage to the Mission site. We would hope to resolve this issue and move forward to make commitments to the preservation of this and other sites in the historic district.

On November 12, 1999, we toured the Mission site with Mike Blum from the Department of Ecology. We discovered significant destruction and movement of material throughout the proposed district. At the Mission site we noted that the historic monument was replaced. However, the removal of the toxic waste which was previously deposited on the site, required significant excavation. This caused additional damage to the site. We noted the disturbance of the site and found some artifacts on the surface.

The Methodist Episcopal Mission has been identified in agreements and other documentation of the historic district. As part of the 1989 Memorandum of Agreement, WRECO agreed to "brief construction supervisors on the Cultural Resource concerns". In addition, the agreement calls for WRECO to "ensure that all construction activities and other equipment comply with the mitigation measures set forth in the (Cultural Resources) plan".

At our December meeting we would like to hear how WRECO plans to avoid disturbance of this and other historic sites during the planning and development of the proposed golf course.

At this time we request that further activity at the Mission site and other identified historic sites be stopped until a survey can be conducted to determine the extent of the damage to these sites.

Also, during our November 12 tour, we noted that heavy equipment and large trucks were operating within the 100 foot buffer that protects Sequelitchew Creek. The buffer was established as a condition for the Shoreline Management permit. In Appendix A, page 1, the buffer was described as within "100 feet of the top of the bank of Sequelitchew Creek shall be retained".

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Nisqually Point Defense Fund
Nisqually Sequalitchew Historic District

A third item to be discussed when we meet is public access and interpretation of historic sites. Conditions for the Shoreline Permit called for the following mitigation:

WRECO agrees to dedicate to the City an area for public trail access along the existing narrow gauge rail on the north side of Sequalitchew Creek to the Puget Sound shoreline in the vicinity of the existing dock.

Our committee feels strongly that preservation of particular sites, without providing public access is not true preservation. Access could be accomplished through retention of selected pathways so that visitors can gain access without impinging upon the property owner's plans for development

We look forward to meeting with you on December 13th. At that time we hope to resolve these issues in such a way that leads toward an agreement about long term preservation of the Nisqually Sequalitchew Historic District. This district was selected by the Washington Trust for Historic Preservation as one of the "Ten Most Endangered Properties" in our state. We hope that we can work together with you to provide the protection that this site deserves.

Kind Regards,

Patrick Steel
For the Nisqually Point Defense Fund

CC: Mike Blum
Allyson Brooks
Charles LeWarne
Tom Skjervold

Weyerhaeuser
Real Estate Company

Northwest Landing
1408 Palisade Blvd
DuPont WA 98327
Tel (253) 964 2311
Fax (253) 964 2326

December 2, 1999

Patrick Steel
Nisqually Point Defense Fund
P.O. Box 198
DuPont, WA 98327

Dear Mr. Steel:

Thank you for stopping by the office yesterday to introduce yourself and drop off a letter. I have had an opportunity to review your letter and wanted to respond.

Your letter primarily addresses issues related to the cleanup of the former DuPont Works site. The property is owned by Weyerhaeuser Company and under a court ordered Consent Decree. After clean up the property will be transferred to the Weyerhaeuser Real Estate Company for development purposes.

It would be most appropriate to address clean up issues with representatives of Weyerhaeuser Company. Accordingly I have forwarded you letter to James Odendahl, Director, Wood Products Regulatory Affairs. He will be taking over for Vern Moore who has been managing the clean-up, but is retiring as of the 17th of December. Mr. Odendahl can be reached at (253) 924-7063.

Our meeting for December 13, 1999 is still appropriate to discuss historic preservation. I am sure that we have common ground and purpose, including appropriate public access.

I look forward to meeting with you, Jim Edgren and Tom Skjervold at 9:30pm on the 13th of December here at the project office.

Sincerely,



Gregory D. Moore AICP
Director of Operations and Planning

CC: James Odendahl
David Brentlinger
Allyson Brooks

Nisqually Point Defense Fund

P.O. Box 198, Dupont, WA 98327

January 18, 2000

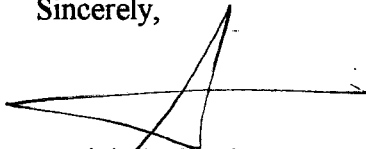
Dr. Allyson Brooks
State Historic Preservation Officer
Office of Archaeology and Historic Preservation
P. O. Box 48343
Olympia, WA 98434-8343

Dear Dr. Brooks:

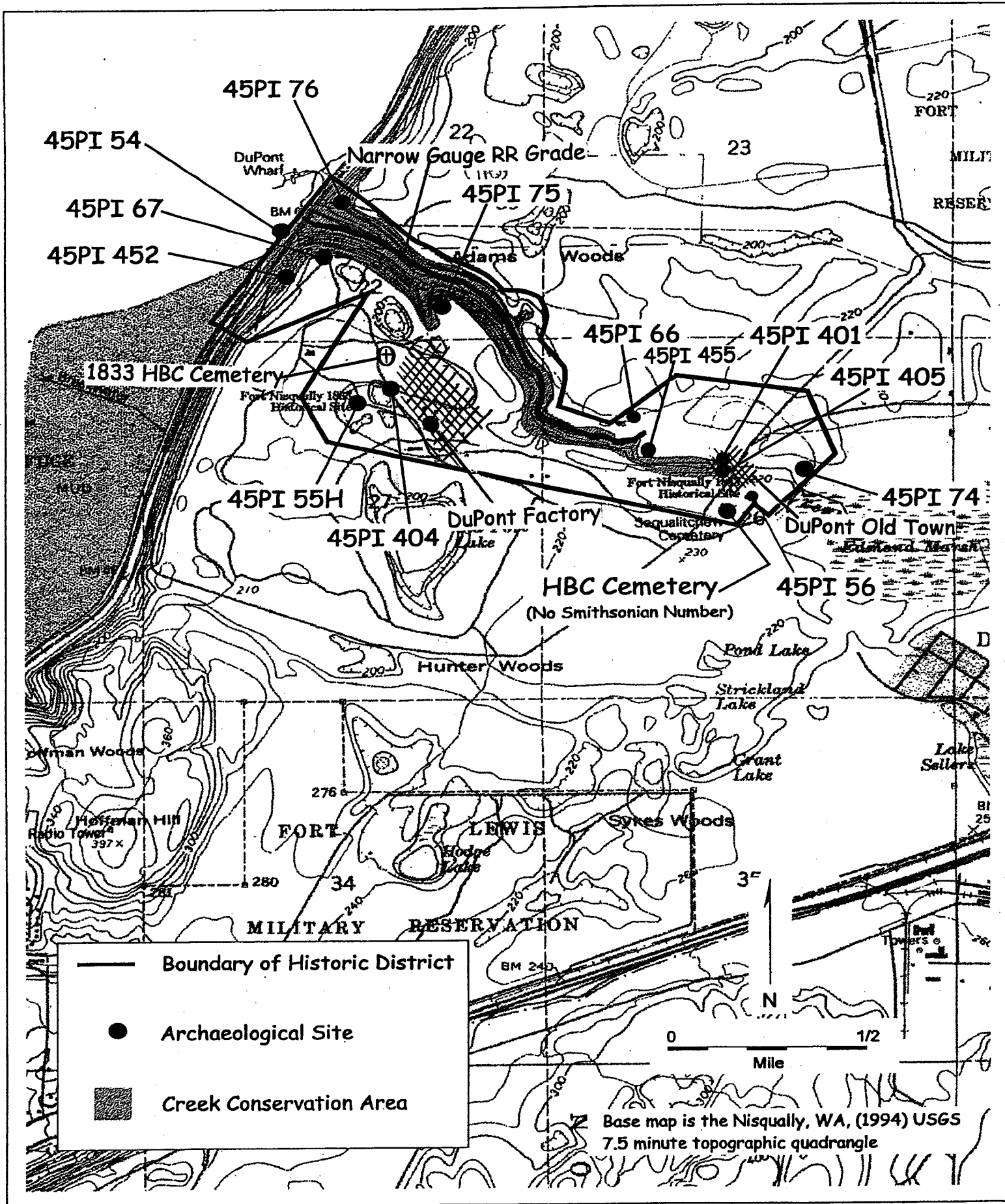
We have been informed that an owner of property located within the boundaries of the Nisqually-Sequalitchew Historic District was not notified of the pending presentation of this nomination to the State Advisory Council. We hereby withdraw the property belonging to the Intel Corporation that is included within the district boundary nomination.

Thank you for this consideration. We apologize for any inconvenience this may have caused you and look forward to the January 28th meeting in Olympia.

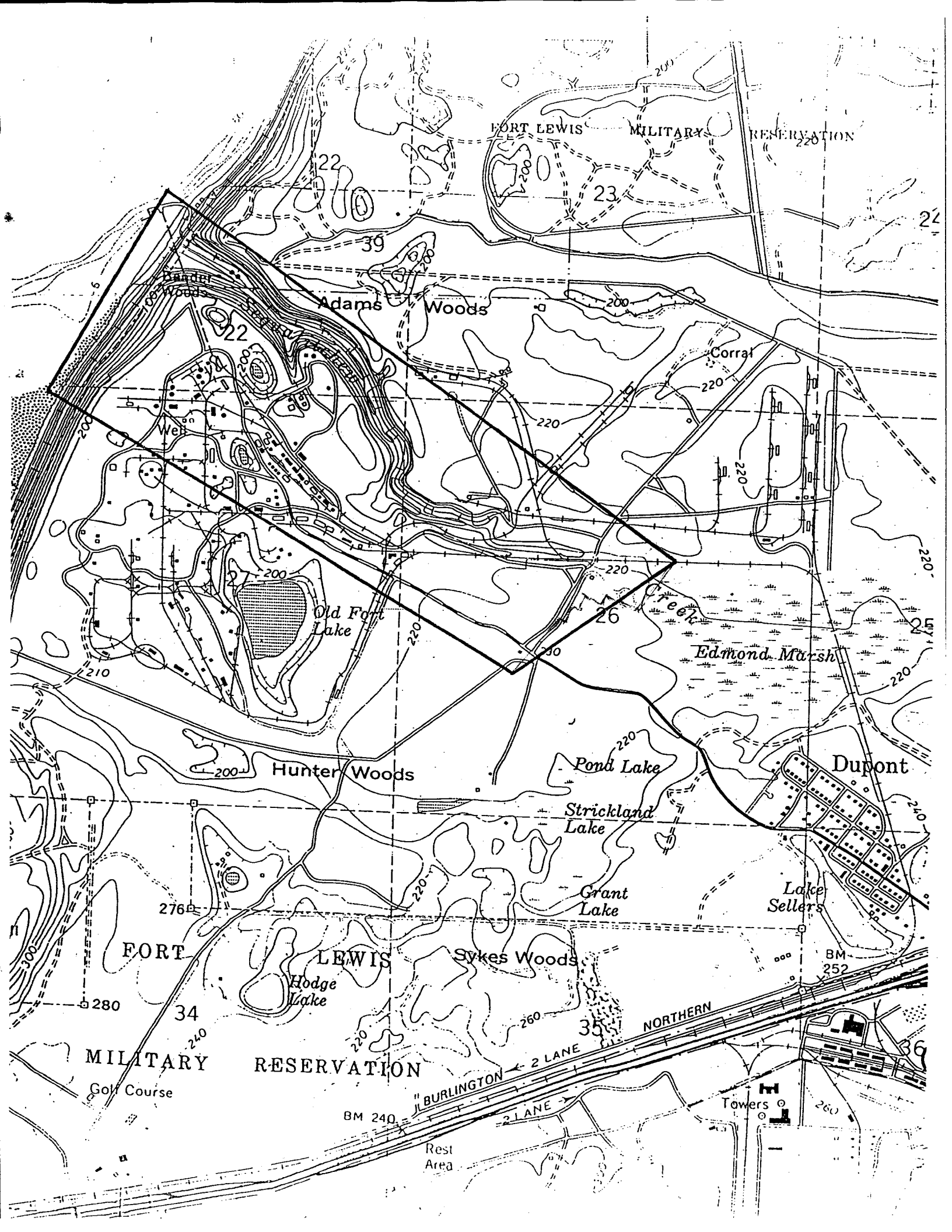
Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick A. Steel', written over a horizontal line.

Patrick A. Steel
For the Nisqually Point Defense Fund



Nisqually-Sequalitchew Historic District, Smithsonian numbered sites.



From the desk of Patrick A. Steel

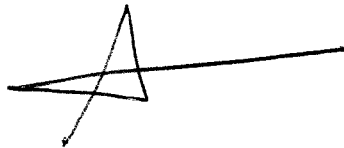
TO: Tom

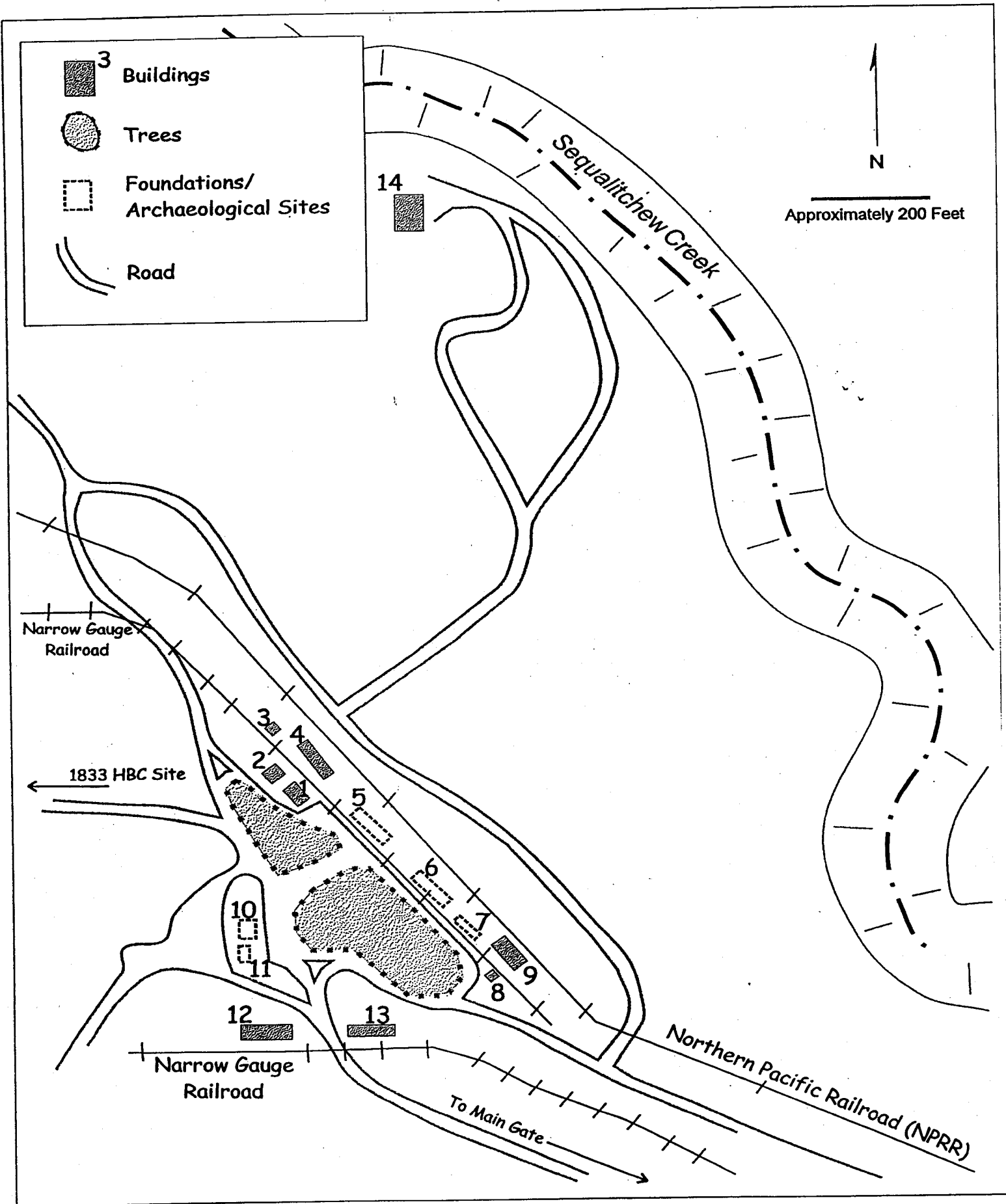
Date: 1/12/00

These are the maps that go with the new nomination. I will bring copies of the nomination with me for the meeting at the DuPont museum at 0900 on the 19th of Jan ~~XXXXXX~~ before the 1000 meeting with W.

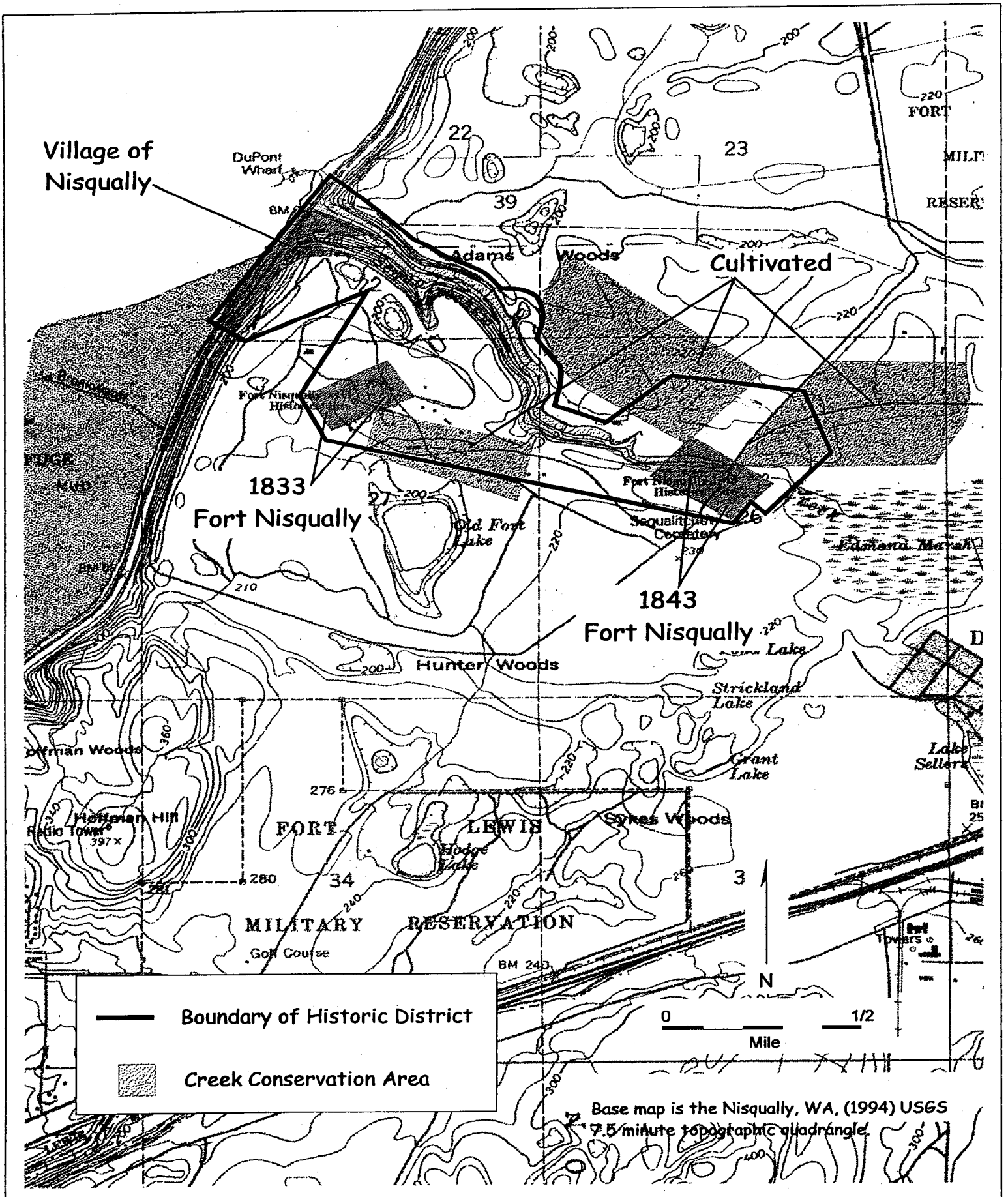
I will probably call you sunday afternoon to make suere that Greg got you all the updated information.

God bless

A handwritten signature consisting of a stylized, elongated shape that resembles a triangle or a star with a horizontal line extending to the right.



Nisqually Sequelitchew Historic District, Dupont Company operations area.



Nisqually Sequalitchew Historic District with approximate 1846 HBC mapped areas imposed.

May 10, 2000

James P. Odendahl
Director
Wood Products Regulatory Affairs
PO Box 2999
CH 1L28
Tacoma, Washington 98477-2999

Dear Mr. Odendahl:

I was asked to delineate the area of concern for archaeological resources at 1833 Fort Nisqually (45-PI-55). I tried to minimize the area of concern. However, despite considerable archaeological work at and inside the perimeter of the Fort, the outer boundaries of the site have not been determined.

There is evidence of archaeological deposits outside the Fort's palisades. Guy Moura, leading expert on the archaeology of the area, states: "*Evidence of a building outside the palisade walls was discovered while trenching for the palisade line. Near the east corner of the fort, along the NEP, a backhoe trench revealed a concentration of clay with a number of cobbles. When the trench walls were cleaned it was discovered that a wood-rich organic stain extended horizontally away from the clay and rocks. As previously stated, the clay and cobbles were sufficient evidence to conclude that we had uncovered a large hearth. The organic stain seems to delineate a floor. It is likely that more exterior structures will be identified during future excavations*" (Moura, Guy. A Testing and Evaluation of the 1833 Fort Nisqually, 45-PI-55 at Northwest Landing, Pierce County, Washington, Western Heritage, Inc. 1990)(emphasis mine). The archaeological deposits mentioned above may be the remnants of 45-PI-73 (The Indian House). Historically, a sawpit, blacksmith shop and other buildings are documented outside the palisade.

In addition, an archaeological crew working outside the 1833 Fort found archaeological features in a backhoe trench that extended to the south of the 1833 Fort. The crew flagged the locations of these features, however, they were not recorded or investigated in any way. I saw these features while visiting at the site.

Finally, there is probably an employee village associated with the 1833 Fort. Such villages were common occurrences at HBC establishments and were found outside Forts Colville, Vancouver (Kanaka Village), Langley, and 1843 Fort Nisqually. "*Where there was no danger from Indians the lower grades of employees were sometimes permitted to live outside the fort confines, although it was seldom that a clerk or officer was allowed to do so*" (Hussey 1975:14)."

Due to the lack of information from controlled archaeological investigations, I have to fall back on Guy Moura's recommendations and standard operating procedures for delineating the boundaries of archaeological sites. Moura recommended that "(a) *systematic, shovel testing program should be initiated outside the fort to search for the remains of Hudson's Bay and Native American features which existed during the occupation of the fort* (Moura, 1990) (emphasis mine)."

I recommend shovel tests at 10-meter intervals. Since the first 63 feet beyond the outer palisade walls have been dedicated as a buffer, shovel testing need not occur in this area. Shovel testing should extend in all directions from the Fort until two consecutive shovel tests turn up no evidence of Hudson's Bay period artifacts. This shovel testing and the subsequent artifact analysis and write up should allow the outer boundaries of the site to be definitely determined. I would anticipate the area of concern to extend no more than 300 feet from the Fort. However, this is an educated guess.

I recommend Guy Moura for the work. He has written the only major work on the site, and is experienced with artifact analysis and with cultural resource management. His number is (503) 457-2456.

If Weyerhaeuser has any additional information on the location and nature of controlled archaeological investigations around the Fort, I would be happy to further limit the area of concern.

If you have any questions please contact me at (360) 352-1628.

Sincerely,



M. Leland Stilson
4426 79th Ave. S.W.
Olympia, WA 98512



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

P.O. Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

October 1, 1997

Mr. Vern Moore
Weyerhaeuser Company
PO Box 100
DuPont, WA 98327-0100

Mr. Jack Frazier
The DuPont Company
Barley Mill Plaza Bldg. 27-1162
PO Box 80027
Wilmington, DE 19880-0027

Re: Residential Soil-Lead Cleanup Standard for Form

Dear Vern and Jack:

This letter is in reply to Tim Bingman's August 25, 1997, letter to me regarding site-specific inputs to the Integrated Exposure Uptake BioKinetic (IEUBK) model for determining residential soil-lead cleanup levels. I will also summarize our recent discussions about soil-lead cleanup in the future residential areas of the former DuPont Works Site and provide you with a decision regarding a site-specific soil cleanup standard for lead. As you know, Ecology is adopting the use of the Environmental Protection Agency's IEUBK model as a basis for setting site-specific residential cleanup levels for the protection of children. The Model Toxics Control Act (MTCA) Science Advisory Board has also concurred in the use of the model for making site-specific decisions.

Over the past several years, the Ecology Team has reviewed numerous submissions from Weyerhaeuser and DuPont Companies related to the topic of soil-lead cleanup standards, most of which dealt with the development of site-specific inputs into the IEUBK model. The most recent discussions on this topic have dealt with the soil-to-dust transfer coefficient input to the model. The standard default value for the soil-to-dust transfer coefficient is seventy percent (70%). We all agreed that 70% may not be a reasonable value to use for the Site, however, we needed adequate site-specific justification to change the default value.

Ecology used the services of Dr. Terri Bowers of Gradient Corporation to review the current literature for information that could provide a value for the soil-to-dust transfer coefficient that would be appropriate for the former DuPont Works Site. Terri provided Ecology with a report dated February 12, 1997 entitled Estimating the Soil-to-Dust Transfer Coefficient, and a memo regarding the Review of Leadville and Sandy Soil-to-Dust Relationships, dated June 24, 1997. On July 11, 1997, after initial review by the Ecology Team, I sent those same materials to Dr. Greg Glass for peer review. Greg is knowledgeable about risk assessment and has familiarity with the issue of soil-to-dust transfer at other cleanup sites. Greg responded on August 12, 1997, to my July 11 letter, which included a list of questions needing his response.

Tom

FYI

Mike Blum

I did not
send a copy
to Ed Kenney.



Mr. Vern Moore
Mr. Jack Frazier
October 1, 1997
Page 3

cc: Tim Bingman, DuPont Company
Terri Bowers, Gradient Corporation
Mary Burg, Ecology Toxics Cleanup Program Manager
Greg Glass, Greg Glass Consulting
Mark Jobson, Assistant Attorney General
Jeff King, DuPont Company
Roseanne Lorenzana, Environmental Protection Agency
Craig McCormack, Ecology Toxics Cleanup Program
Pamela Meitner, DuPont Company Legal Department
Ralph Palumbo, Summit Law Group
Willard Shenkel, City of DuPont
Jim White, Washington State Department of Health
Marian Wineman, Woodward Clyde Consultants
Ecology's Weyerhaeuser/DuPont Site Team



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

P.O. Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

October 1, 1997

Mr. Vern Moore
Weyerhaeuser Company
PO Box 100
DuPont, WA 98327-0100

Mr. Jack Frazier
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Wilmington, DE 19880-0027

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Mr. Vern Moore
Mr. Jack Frazier
October 1, 1997
Page 2

Based on the work by Terri and Greg, it appears that the 70% default value for the soil-to-dust transfer coefficient is an overestimate for this parameter at the former DuPont Works Site. This conclusion is mostly based on the fact that 1) the new homes to be constructed at the Site will not contain lead-based paint, 2) leaded gasoline will not be used in motor vehicles in the future, and 3) the future roads in the area will not have been impacted by past leaded gasoline use. Both consultants provided similar ranges of soil-to-dust transfer coefficients that would be defensible for use at the Site.

As noted in Tim's letter, Terri recommended using a soil-to-dust transfer coefficient on the order of 15 to 45%. Greg's opinion was that the range was 15 to 50% "with relatively high confidence", or 20 to 45% "with somewhat lesser but still appreciable confidence." The Ecology Team has selected 45%, a value from the upper portion of the soil-to-dust transfer coefficient range, to account for uncertainties in the underlying data, and its application at this site. The Ecology Team then applied the 45% transfer coefficient along with a site-specific ground water lead level of 2.0 ug/l to the IEUBK model. Using these inputs, the Ecology Team determined the residential soil cleanup level that would be protective of 95% of the child population (0 to 84 months of age) at a blood-lead level of 10 ug/dl.

Using the input parameters noted above, the IEUBK model estimates a soil-lead cleanup value of 443 mg/kg as protective. The proposed future development of the residential areas of the Site includes removal of the lead-contaminated topsoil prior to home construction, followed by replacement with clean topsoil and sod after the new homes are constructed. Considering the proposed future conditions at the Site, and the accuracy of the soil-to-dust transfer coefficient estimate, Ecology approves a risk management concentration of 450 mg/kg as protective of human health in the future residential areas at the former DuPont Works Site.

The Ecology Team recognizes that agreement on this issue marks a significant milestone in the project. We look forward to resolving the remaining technical issues including a soil-lead cleanup standard for the non-residential areas of the Site. If you or any of your team have any questions regarding this letter, please give me a telephone call at (360) 407-6262.

Sincerely,



Mike Blum
Site Manager
Toxics Cleanup Program

MB:td

cc: Distribution list

LITTLER
ENVIRONMENTAL
CONSULTING, INC.

21231 50th Dr. S.E.
Woodinville, WA 98072
Phone/FAX: (206) 486-3861

October 6, 1995

Mr. Tom Skjervold, Project Manager
DuPont Toxics Citizen Oversight Project
P.O. Box 7444
Olympia, WA 98507

Dear Tom,

We are pleased to announce that our company recently went through the incorporation process. As a result I need to advise you that our corporate name has changed slightly to **Littler Environmental Consulting, Inc.**

Our new Tax Payer ID Number is **91-1688844**, and this number should be used for all future accounting purposes.

This change will not in any way affect the manner in which we provide services to our clients, and we hope this causes no inconvenience to you. I have attached new business cards for your file and look forward to continuing to serve you.

Please give me a call if you have any questions or if I can be of any further service.

Sincerely,



John D. Littler, P.E.

**Final Cleanup Action Plan - Parcel 2
Former DuPont Works Site
DuPont, Washington**

**Prepared by
Washington State
Department of Ecology
Toxics Cleanup Program**

March 4, 1997

This Cleanup Action Plan Also Includes:

- 1) Proposed Declaration of Restrictive Covenant,
- 2) Legal Description of Property, and
- 3) Proposed Amendment to Consent Decree