

December 24, 2009

Project 10131.000

Ms. Sandra Caldwell
Mr. Panjini Balaragu
Washington State Department of Ecology
Toxics Cleanup Program
300 Desmond Dr. SE
P.O. Box 47600
Olympia, WA 98504-7600

Subject: MJB Properties, Anacortes, Washington, FS ID #2690

Dear Ms. Caldwell and Mr. Balaragu:

On behalf of MJB Properties, we would like to thank you for meeting with us on December 17, 2009 for a discussion of the upcoming work required on the MJB Properties in Anacortes, Washington. MJB Properties' site (FS ID #2690) includes all the MJB Properties-owned land from 17th Street on the north to 29th Street on the south (Figure 1). The listing additionally includes the area from 29th to 30th Streets that MJB Properties does not own. A portion of MJB Properties' North Yard from 17th to 20th Streets is covered under the Consent Decree No. 09-2-01247-7. This Consent Decree is between Ecology and the Port of Anacortes and Kimberly-Clark, and the site is currently undergoing remedial actions. Figure 2 shows the area owned by MJB Properties that is located outside of the Consent Decree site.

As discussed at the meeting, MJB requests a redefinition of the site listing so that the original site can be segregated into areas that are historically linked based upon site use. The original listing in 1995 included all the property owned by MJB, without any acknowledgement of the historical site use linkage of the parcels within the property. Since that time, more historical information has become available about the over 100 acres of property. Based on this new information, the parcels that are outside of the Consent Decree site are now seen to have distinct site use histories, and are more appropriately grouped into smaller, historically-linked units. MJB Properties understands that future efforts to satisfy the Model Toxics Control Act requirements may necessitate each relisted portion of the original site to participate in an Agreed Order. The specific regulatory process will be discussed with Ecology for each relisted portion. The timing of additional work will necessarily depend on resource availability and development coordination.

Attached are several historical Sanborn maps and aerial photographs showing the locations of previous industrial and residential facilities on the parcels now owned by MJB Properties. All of these maps have been provided to Ecology previously over the last year, but are now consolidated into this single document.







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MJB Properties is eager to work with Ecology on redefining the formal site boundaries for the historically-linked parcels. We are grateful for your assistance in expediting the process, and please let me know if you have questions or require additional information.

Thank you for your consideration.

Sincerely yours,

AMEC Geomatrix, Inc.

Kathleen Goodman

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cc: Gary Merlino, MJB Managing Partner

Jack Jones, MJB Partner Jimmy Blais, GMCC

William Joyce, Salter Joyce and Ziker

Attachment: Figure 1 – MJB Properties North Area, Central Area, and South Dock

Figure 2 – MJB Area and Ownership of Adjoining Areas

Figure 3 – 1907 Sanborn map—Index map with insets of 27th to 28th Streets,

and 28th to 29th Streets

Figure 4 – 1907 Sanborn map—20th to 24th Streets Figure 5 – 1925 Sanborn map—20th to 24th Streets Figure 6 – 1925 Sanborn map—24th to 28th Streets

Figure 7 – Aerial photograph 1969

Figure 8 – Aerial photograph June 10, 1974 Figure 9 – Aerial photograph September 10, 1980

Figure 10 – Aerial photograph June 18, 1985

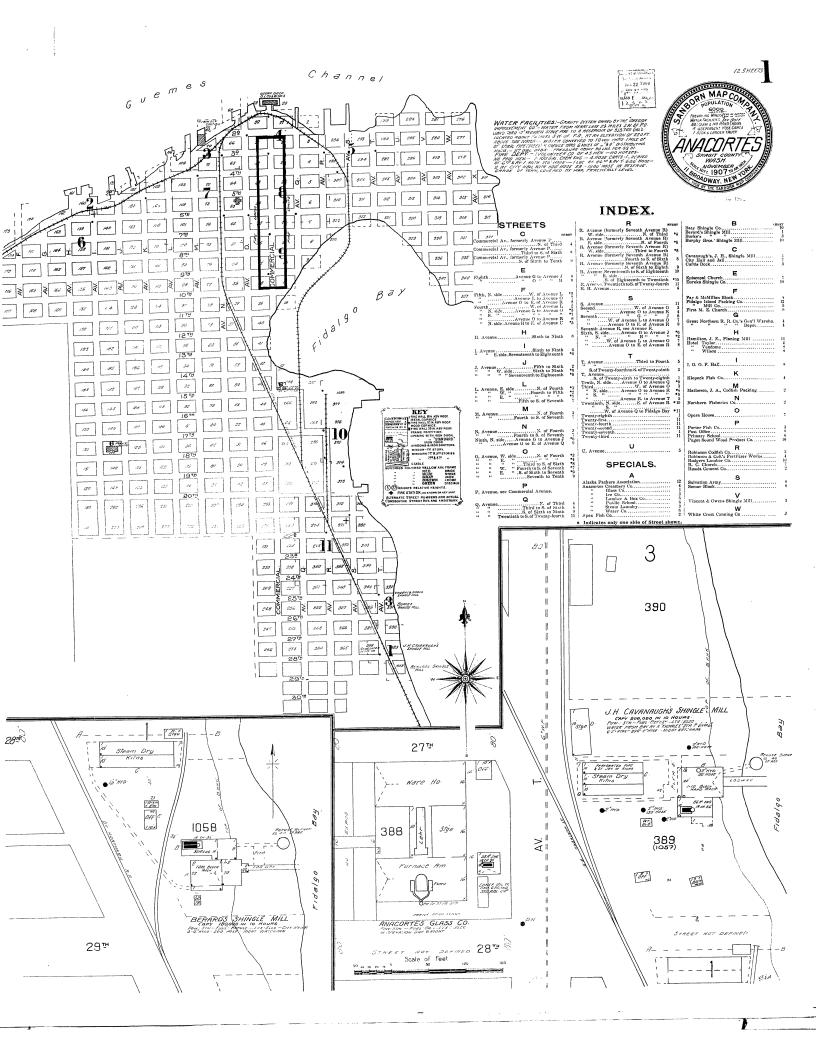
Figure 11 – Oblique aerial photo from 1974 from Army Corps of Engineers report

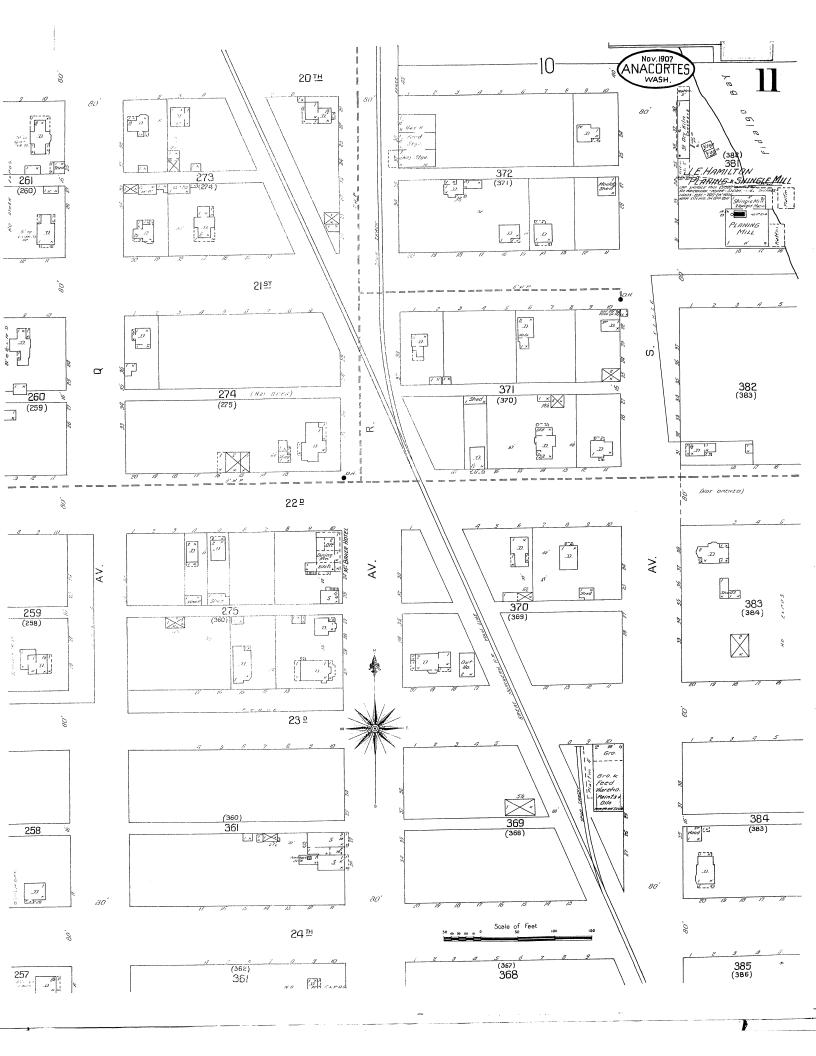


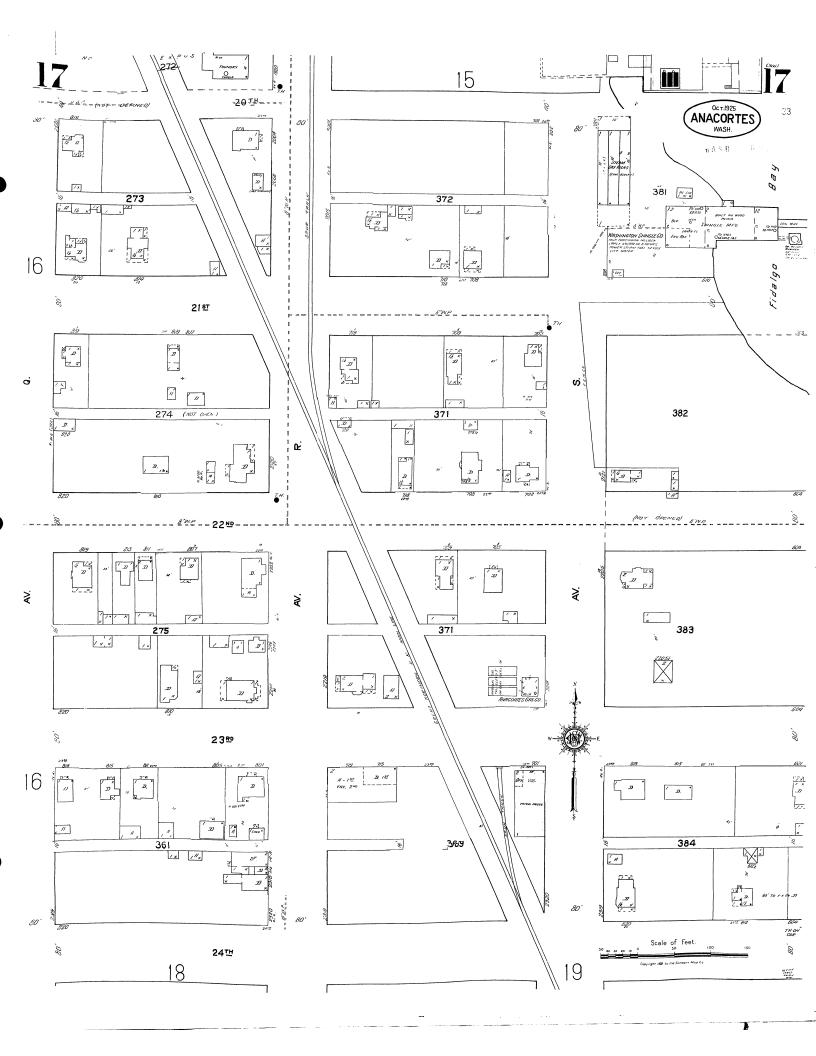
FIGURES

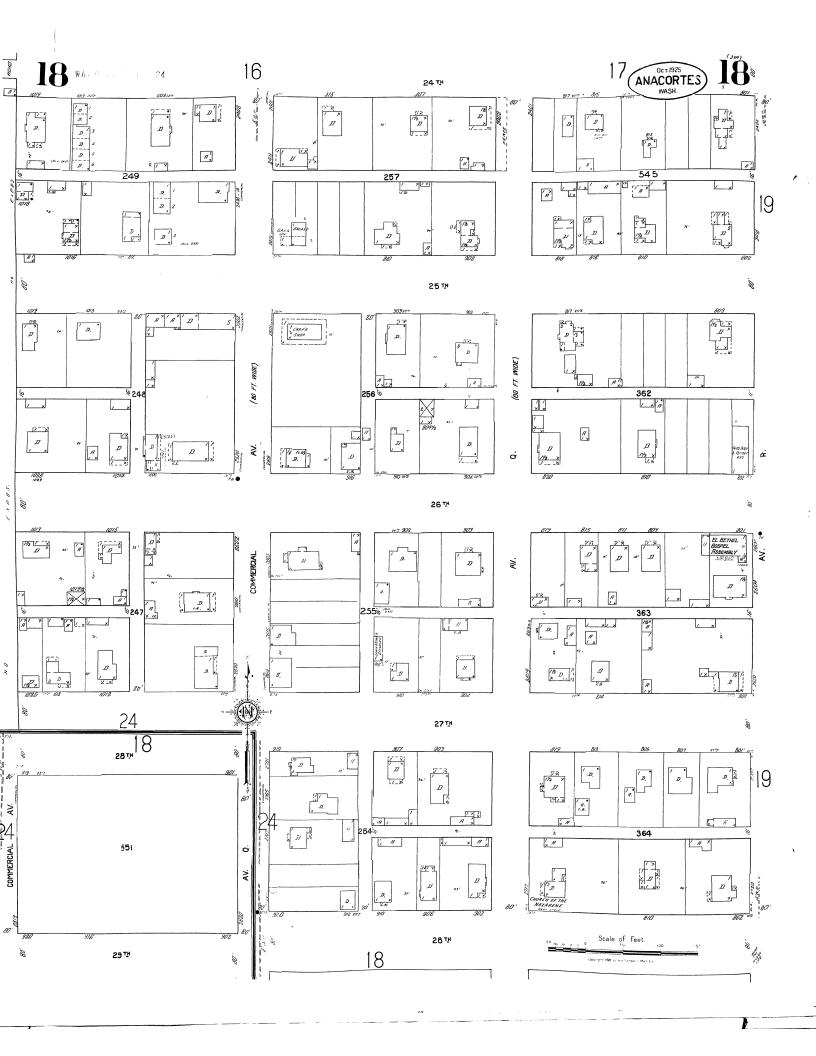


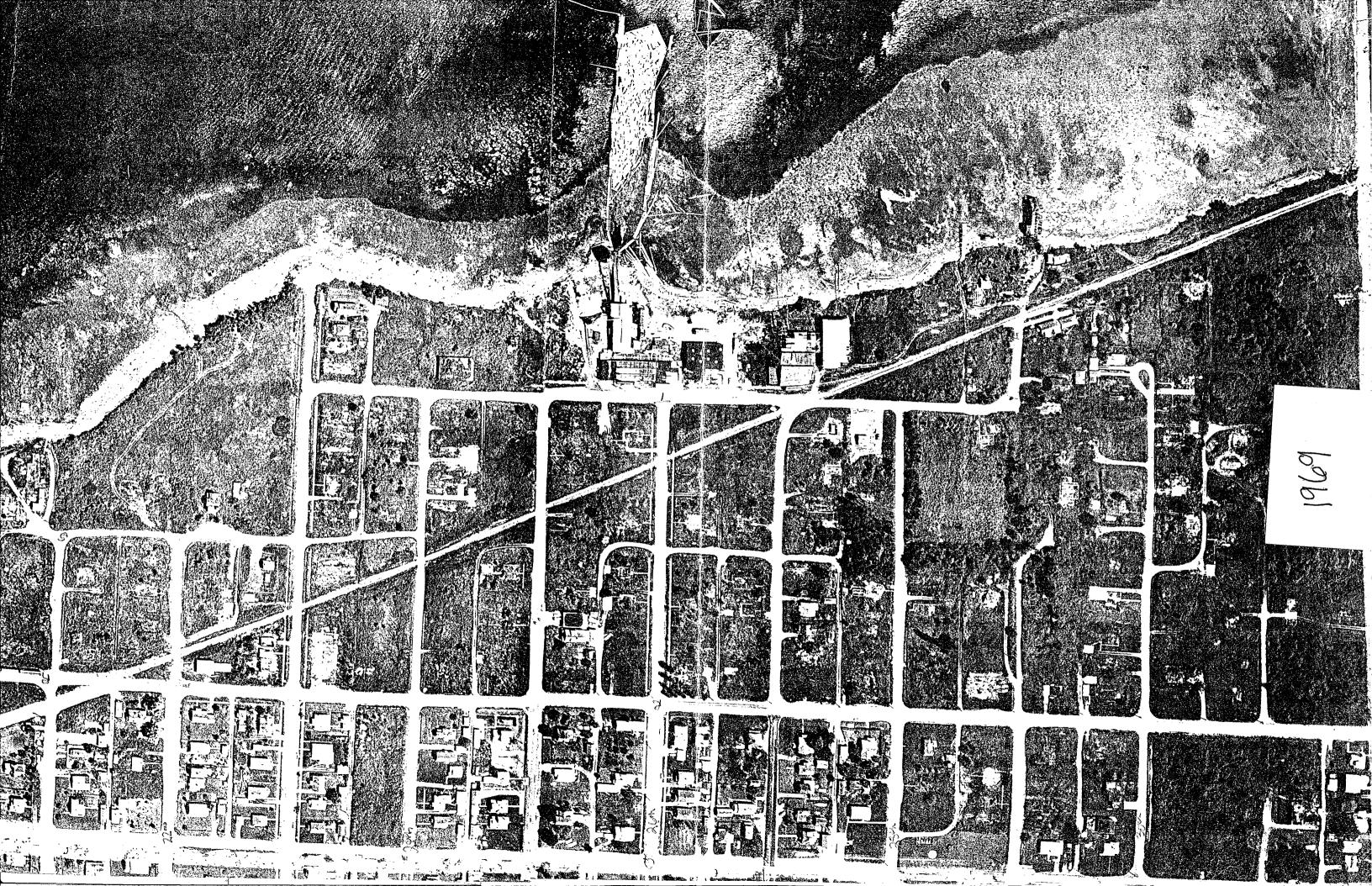


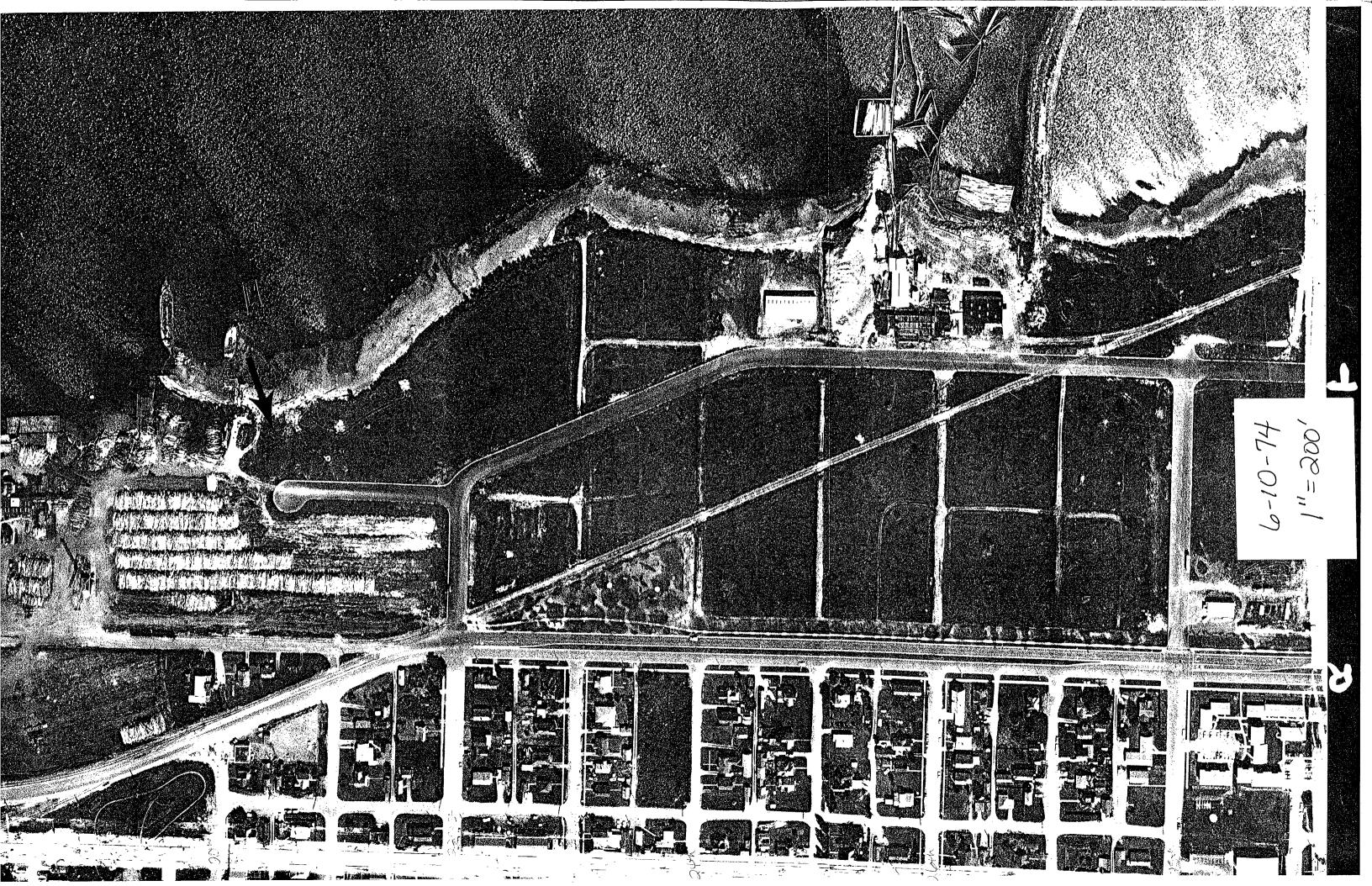


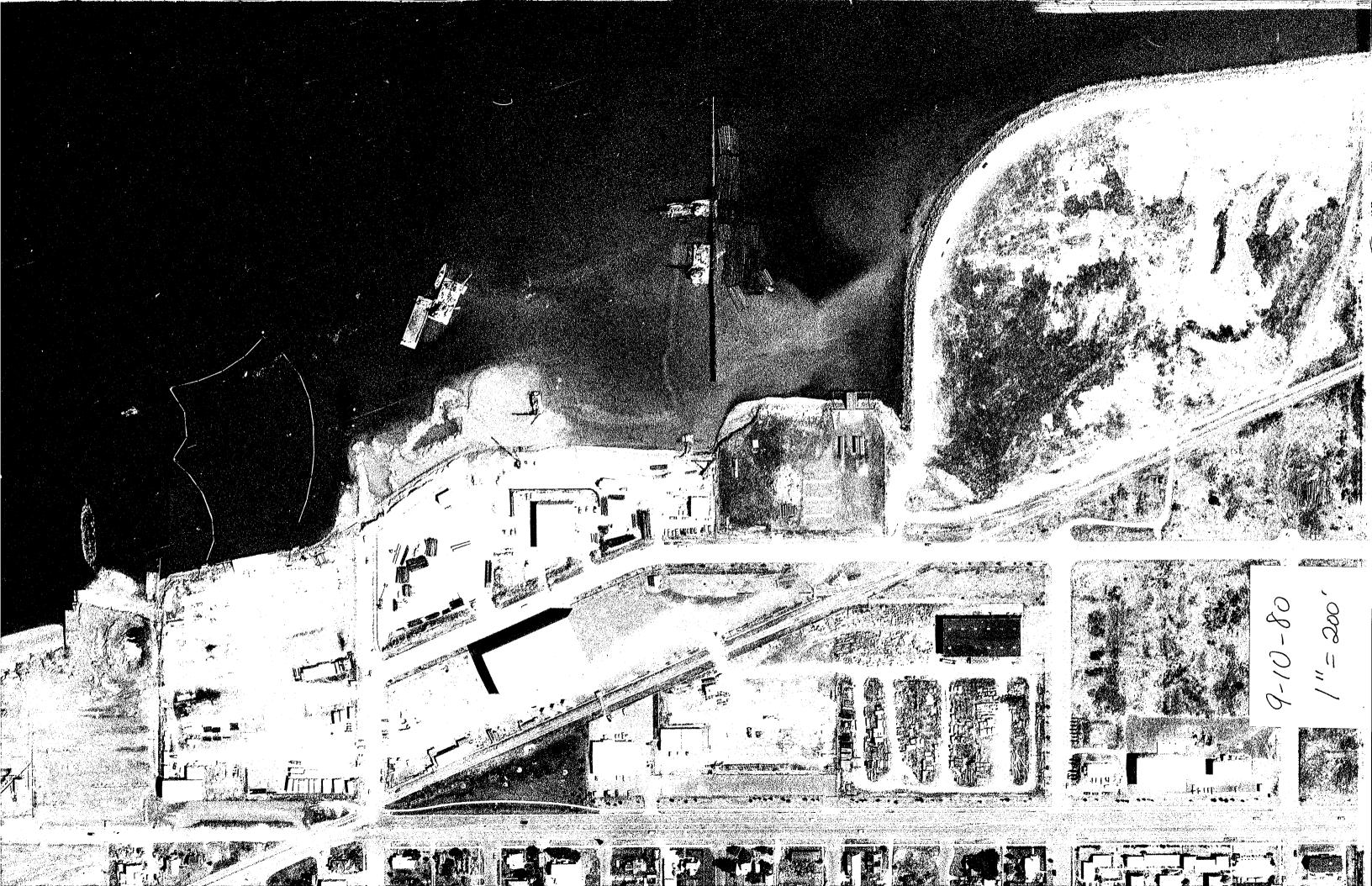




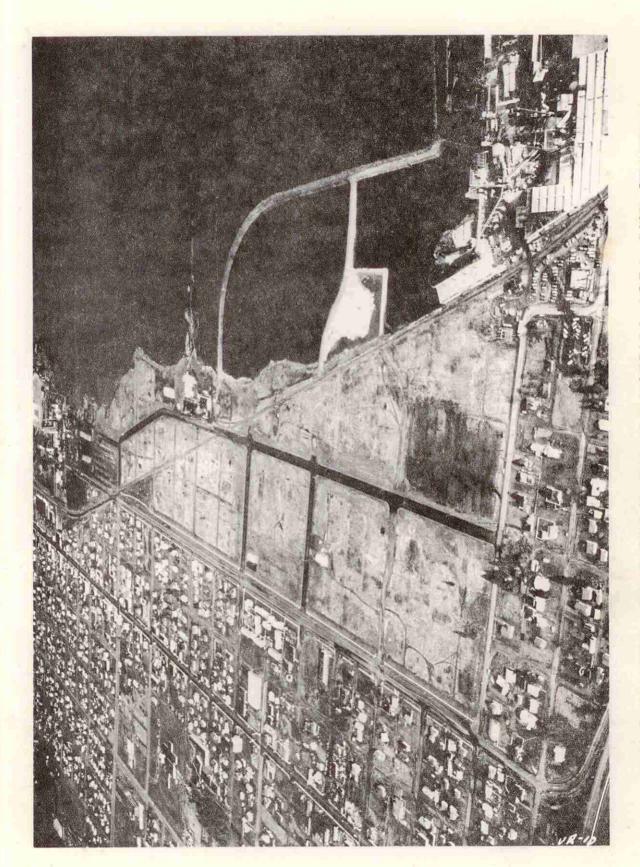












PROJECT AREA SHOWING H.U.D. INDUSTRIAL AREA AND SEAWALL