

Memorandum

June 4, 2024

To: Frank Winslow, Washington State Department of Ecology
From: Austin Jenkins, Archaeologist, Anchor QEA
cc: Nathan Soccorsy, Jason Cornetta, and Nina Maas, Anchor QEA Inc.
Eric Rapp, JELD-WEN, Inc.

Re: JELD-WEN Step 2 Aquatic Pre-design Investigation, Archaeological Considerations

JELD-WEN, Inc. is conducting a Pre-design Investigation that includes the collection, processing, and testing of subsurface soil and sediments in accordance with second amendment to Agreed Order No. DE 5095. In accordance with Model Toxics Control Act Regulations, The Washington State Department of Ecology (Ecology) has coordinated with the Washington State Department of Archaeology and Historic Preservation (DAHP; Project # 2022-09-06278). Ecology communicated the results of the DAHP consultation to the JELD-WEN team in May 2024. I initially formulated and communicated my interpretation to my internal team by email on May 23, 2024.

As a result of the DAHP and Ecology coordination, I have reviewed historical records and documentation related to the initial characterization protocols for the JELD-WEN Step 2 aquatic Pre-design Investigation (power grab and short core characterization) in accordance with the recommendations and determination provided by the Department of Ecology (Ecology) regarding Cultural Resources Protection (WAC 173-340-815).

Based on the development history of the tide flats indicated by historical maps and review of available geologic information, the first phase of explorations will reach up to 3-feet in depth and penetrate into sediments that are either recently deposited or are fill/dredge material that were deposited during the creation of the adjacent federal navigation channel and adjoining uplands. These initial boring have very low potential to impact archaeological sites. For the initial phases of work limited to explorations 3-feet in depth, the existing Inadvertent Discovery Plan (IDP) approved by Ecology provides sufficient protection of cultural resources. I will remain on call during the implementation of this approved program to provide support for any IDP-related questions during implementation.

Concurrent with the initial phases of aquatic investigation, I will continue to review additional information for explorations planned for greater than 3-feet in depth (upland and in water) to develop an appropriate, site-specific archaeological monitoring plan prior to the next phase of deeper testing, tentatively scheduled for July 2024.