

## **Appendix D**

# **Cultural Resource Monitoring Protocol**

## **RAYONIER MILL OFF-PROPERTY SOIL DIOXIN STUDY CULTURAL RESOURCES MONITORING AND REPORTING PROTOCOL**

This protocol addresses cultural resources monitoring procedures to be conducted during the Rayonier Mill Off-Property Soil Dioxin Study (“study”). The study involves the collection of soil samples from areas in Port Angeles surrounding the former Rayonier Mill. Composite surface soil samples (0-3 inches in depth) will be collected during the investigation. Due to the potential presence of cultural artifacts in the area, cultural resources monitoring is required.

### **Document Existing Information**

Under this task, E & E has searched the archives at the Washington Department of Archaeology and Historic Preservation (DAHP) and has obtained and reviewed existing information pertaining to previous cultural resources investigations within or near Port Angeles. Following field work and data review, E & E will prepare an interpretive report on the findings of the monitoring and the cultural setting of the area (see reporting task below).

### **Soil Sampling and Analysis Cultural Resources Monitoring**

The methodologies described here are consistent with standard cultural resources monitoring practices and the Lower Elwha Klallam Tribe (LEKT) Monitoring and Discovery Plan, which has been provided to E & E by the LEKT. Cultural resources monitoring procedures were approved during meetings between E & E archaeologist Sandra Pentney, LEKT archaeologist Bill White, and City of Port Angeles archaeologist Derek Beery on May 1, 2008.

In preparation for this project, a cultural resources records search was conducted at the DAHP to identify previously recorded resources in the area. The data recovered during this search was used to plan the sampling procedures to avoid known cultural resources. The soil sampling plan is biased towards choosing locations that are the least disturbed. This increases the chances that cultural resources may be encountered as the Port Angeles area has a rich and diverse culture history.

The intent of the cultural resources monitoring is to have a qualified archaeologist present during the collection of soil samples in an effort to protect cultural resources from disturbance. The sampling will be performed by two crews. Each crew is to have an archaeologist present at all times. The archaeologist will have stop work authority should any cultural resources be encountered during the sampling. All sample locations will be examined prior to any ground cover removal and the cleared surface will also be examined prior to the sampling being conducted. E & E will provide notification to the LEKT and the City of Port Angeles archaeologist 24 hours prior to the start of sampling activities requiring archaeological monitoring.

The sampling procedure states that the sampling team will collect subsamples from the four corners and the center of a 10-foot by 10-foot template. This method is subject to field modification as conditions require. Prior to sampling, the existing ground cover will be removed

to expose the soil layer and a stainless steel spade or trowel will be used to collect the sample. Following sampling, the hole will be filled with top soil and the ground cover will be replaced. The sample will be hand kneaded to remove roots and any debris that is larger than two centimeters. All rocks and other debris will be avoided as much as possible during sample collection.

An E & E archaeologist will examine all soil samples collected during the project. Cultural materials that may be encountered can include, but may not be limited to, fire modified rock, animal bone, lithic debitage, flaked or ground stone tools, cordage and fibers, charcoal, ash, exotic rocks and minerals, historic bottles, ceramic shards, nails, wire, and wood. All finds will be extensively documented using photographs, sketches, scaled drawings and written descriptions.

In the event that artifacts are found, the find will be documented and properly recorded on Washington Archaeological Site Inventory Form and Washington Archaeological Isolate Form, and the artifact will be returned to the hole from which it was recovered. The LEKT archaeologist, City of Port Angeles archaeologist, and land owner will be notified of the find. Should the find be recovered in any subsample, the sample location will be moved to a new location.

In the event of the discovery of an artifact, the LEKT, City of Port Angeles, and Ecology will be notified within 24 hours of the find. The points of contact for the LEKT will include:

- Primary Contact: Bill White, Tribal Archaeologist (360) 460-1617
- Secondary Contact: Larry Dunn, Tribal Cleanup Project Manager (360) 452-8471 x126

The points of contact for the City of Port Angeles include:

- Primary Contact: Derek Beery, City of Port Angeles Archaeologist (360) 417-4704
- Secondary Contact: Nathan West, Deputy Director of Community and Economic Development (360) 417-4751

In addition, Dr. Rob Whitlam of DAHP (360-586-3080) will be kept informed of all communications with the LEKT and the City of Port Angeles archaeologist.

Since all artifacts encountered are the property of the landowner from which the artifact is recovered, the landowner will be notified of the artifacts as soon as practical. The land owner, LEKT, City of Port Angeles, and Ecology will be provided with copies of all of the documentation associated with the find, including the isolate record form required by the DAHP within 14 days of the find.

In the event that human remains are encountered in any of the samples, the E & E archaeologist will immediately notify the Port Angeles City Police, the City of Port Angeles archaeologist, and the Clallam County Coroner. The LEKT and the DAHP will also be notified should it be determined that the remains are of Native American origin. Documentation (photographs) of human remains will not be collected until approval is issued by the City of Port Angeles

archaeologist and/or the LEKT. Contact information for the police and the Coroner is as follows:

- Port Angeles Police Department (non-emergency): (360) 452-4545
- Clallam County Coroner: Deborah Kelly (360) 417-2297

### **Prepare Cultural Resources Monitoring Report**

E & E will prepare a Cultural Resources Monitoring Report detailing the procedures used in the field and a summary of any cultural resources encountered during the soil sampling. This report will be included in the final study report. Since the DAHP does not currently have a standard report format for cultural resources monitoring activities, the Archaeological Resource Management Reports (ARMR) Guidelines will be used. The ARMR guidelines are consistent with the Washington State Standards for Cultural Resources Reporting for excavation activities. Under these Guidelines the report will consist of the following sections:

- 1. Management Summary/Abstract**
- 2. Introduction**
- 3. Setting**
- 4. Investigation Design**
- 5. Monitoring Methods**
- 6. Report of Findings**
- 7. Discussion/Interpretation**
- 8. Management Considerations**
- 9. References**
- 10. Appendices**

### **Qualified Archaeologist**

E & E's archaeologist, Sandra Pentney, is a registered professional archaeologist and is the principal investigator for this study. Ms. Pentney is assisted by trained archaeologist, Christine McCollum. Recent experience and credentials for Ms. Pentney and Ms. McCollum are appended to this protocol.

## SANDRA PENTNEY, RPA Cultural Resource Specialist

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### EDUCATION

M.A., Archaeology,  
University of  
Saskatchewan, Canada

B.A., Anthropology  
(honours degree),  
Lakehead University,  
Canada

### CERTIFICATIONS

Registered Professional  
Archaeologist, Register  
of Professional  
Archaeologists

With eight years' professional experience, Ms. Pentney has managed and conducted numerous cultural resource investigations throughout California. She is a seasoned principal investigator, having performed numerous cultural resource inventories; archaeological surveys, evaluations, and mitigation; consultation with involved agencies, interested parties, and Native American groups; and evaluation of compliance with California State and federal laws. Her projects include archaeological testing, monitoring, and surveys; record searches; artifact analysis; and report writing. A skilled technical report writer, she prepares cultural resource sections for environmental assessments, reports, and impact statements as required by the National Environmental Policy Act, Sections 106 and 110 of the National Historic Preservation Act, stipulations of the Federal Energy Regulatory Commission, and state legislation.

### Wind Energy and Transmission Line Projects

**Proposed Wind Energy Project Site, El Paso County, Colorado.** For Clipper Windpower Development Company, Ms. Pentney prepared the cultural resource sections of E & E's environmental constraints analysis for a proposed 25,000-acre wind energy project site in southeastern Colorado. She conducted a Class I site file search and developed a cultural resource constraints map. Based on the recommendations of the constraints analysis, the client retained E & E to provide full permitting and environmental studies for the proposed project site.

**Four Wind Energy Facilities, Texas.** For BP Alternative Energy North America, Ms. Pentney conducted Class I cultural resource studies as part of E & E's constraints analysis for four proposed wind farm projects located in Wichita, Archer/Young, Childress, and Hardeman Counties.

**SoCal Edison Valley-Ivyglen Subtransmission Line and Fogarty Substation, Riverside County, California.** She helped prepare the cultural resources section of E & E's draft EIR for the 25-mile, 115 kV Valley-Ivyglen subtransmission line and the Fogarty substation, on behalf of the California Public Utilities Commission.

**Baja Transmission Line, San Diego County, California.** For Sempra Generation, Ms. Pentney conducted Class II archeological investigation for compliance with Section 106 of the National Historic Preservation Act for E & E's EA for this 1-mile transmission line extending from the Mexico border to the South West Power Link Line.

## Oil and Gas Industry

**Clearwater LNG Port, Oxnard, California.** For Clearwater Port, LLC, Ms. Pentney is providing cultural resource evaluations to support E & E's preparation of a third-party EIS/EIR under direction of USCG (lead agency). She participated in public scoping meetings, is reviewing cultural resource studies, and is preparing the cultural resource sections of the EIS/EIR. She also will be responsible for devising the cultural resource mitigation and monitoring plans.

**Ruby Natural Gas Pipeline, Wyoming to Oregon.** For Colorado Interstate Gas Company, Ms. Pentney conducted a cultural resource records search as part of E & E's critical issues and alternatives analysis for this 680-mile, five-state natural gas pipeline crossing private, state, and federal lands, including those managed by DOI's Bureau of Land Management and the USDA Forest Service. She delineated areas that might have cultural resource issues that could hinder project development.

**Oil and Gas Development Projects, British Columbia, Canada.** Based in Fort St. John, Ms. Pentney was the crew chief for an archaeological survey of oil and gas developments located in remote areas of northeastern British Columbia. She developed the testing strategy, supervised the field crews, and wrote and submitted interim reports for several clients including PetroCanada, Shell, and El Paso Corporation. The work included application of Global Positioning System technology and use of both all-terrain vehicles and helicopters to access the sites.

## DoD

**Navy Base Point Loma (NBPL), San Diego, California.** For NAVFAC Southwest, Ms. Pentney prepared the cultural resource section of the Phase II base closure and realignment (BRAC) EA and compiled the site administrative records for both phases of the BRAC EA and associated documents. The project included reviews of prior cultural resource surveys and management plans for archaeological and architectural resources at Naval Base Point Loma, Naval Base San Diego, and Naval Base Coronado.

**Chocolate Mountain Aerial Gunnery Range, Niland, California.** For the Southwest Division of the Naval Facilities Engineering Command (NAVFAC Southwest), Ms. Pentney was E & E's cultural resource task leader for the preparation of NEPA EA documentation addressing ongoing training activities conducted by the Naval Special Warfare Group ONE at this Desert Training Facility. She identified cultural resource survey requirements, developed the survey field strategy, and prepared the cultural resource section of the EA.

**NAWS China Lake, Ridgecrest, California.** For NAVFAC Southwest, Ms. Pentney was a member of the cultural resource team for E & E's base closure and realignment (BRAC) EA for the Weapons Survivability Laboratory at Naval Air Weapons Station (NAWS) China Lake. Many existing structures at the site are eligible for listing on the National Register of Historic Places, either individually or as contributing elements to a historic district. Ms. Pentney reviewed the cultural resource report.

## Other Federal Clients

**Truckhaven Geothermal Leasing Area EIS, Salton Sea, California.** For DOI's Bureau of Land Management, she provided cultural resource evaluations for E & E's EIS addressing environmental impacts of the proposed Truckhaven Geothermal Leasing Area in California's Imperial Valley.

**EPA Circuit Rider Program, California, Nevada, and Arizona.** To support EPA Region 9 in its Public Water Systems Supervision and Underground Injection Control programs, she assessed the content of ongoing Native American water/wastewater system operation and management training seminars.

**EDUCATION**

B.A., Anthropology,  
University of California  
at Davis

A.A., Social Science, Diablo  
Valley College

With six years' postgraduate experience, Ms. McCollum participates in environmental impact evaluations and regulatory compliance reviews and permitting programs for industrial, commercial, and military facilities. She prepares sections on cultural resources for EAs, EISs, and ERs; researches and writes socioeconomic and land use summaries for environmental reports; participates in all aspects of the planning and facilitation of associated public meetings and hearings; and conducts research for and helps facilitate environmental training programs.

**BHP Billiton Cabrillo Port Offshore LNG Import Terminal, Ventura County, California.** In support of E & E's multimillion-dollar EIS/EIR for the California State Lands Commission and United States Coast Guard (USCG), Ms. McCollum helped coordinate public meetings for the final public license hearing held by the Maritime Administration and USCG. She placed hearing notices in local newspapers, coordinated meeting logistics, staffed the meeting registration table at the hearing, worked with community members during the oral comment process, and researched and helped complete the administrative record.

**CSPL-2 Replacement Project, California.** For the San Francisco Public Utilities Commission, she was a member of the E & E team that developed CEQA documentation addressing replacement of the Crystal Springs Pipeline No. 2 (CSPL-2) water pipeline, which was under evaluation as part of the City and County of San Francisco's Water System Improvement Program. Ms. McCollum wrote the April 2007 Neighborhood Notice and used the results of E & E's preliminary study to produce a wetland delineation summary.

**PdV Wind Farm, Kern County, California.** For the Kern County Planning Department, she was a member of the E & E team that prepared a third-party CEQA EIR for this 300-MW wind power project, proposed for construction on privately owned land. She reviewed Kern County General Plan Guidelines; reviewed the archeological/cultural resource subcontractor's report; wrote sections addressing visual resources/aesthetics, especially with respect to the Pacific Crest National Scenic Trail; and conducted Web research on population and demographic statistics and helped write the respective EIR sections.

**Shiloh II Wind Farm, Solano County, California.** For the Solano County Department of Resource Management, she edited sections of E & E's final third-party EIR for a 176-MW wind energy facility proposed by Shiloh Wind Partners, LLC (owned by EnXco, Inc.), on about 6,100 acres of private land within the County's Montezuma Wind Resource Area. She helped prepare a PowerPoint presentation for a public meeting and assisted in the distribution of the final EIR prior to the meeting.

**Montezuma Wind Project, Solano County, California.** For the Solano County Department of Resource Management, Ms. McCollum also helped prepare a PowerPoint presentation for a public meeting associated with E & E's third-party EIR for this 37-MW wind project proposed by FPL Energy, for location near EnXco's proposed Shiloh II wind project.

**Potential Wind Farm Site, Sonoma County, California.** As a member of the E & E team that conducted a permitting feasibility study for a confidential client, she conducted desktop research and wrote the report section addressing cultural, historical, archaeological, and paleontological resources in the study area.

**EPA Circuit Rider Program, California, Nevada, and Arizona.** To support EPA Region 9 in its Public Water Systems Supervision and Underground Injection Control programs, Ms. McCollum assessed ongoing Native American water/wastewater system operations and management training with regard to regulatory compliance. Working with representatives of EPA Region 9 and the Rural Community Assistance Corporation, she helped facilitate a train-the-trainer workshop in septic system functions, monitoring, and establishment of an operation and maintenance (O&M) plan for Dry Creek Rancheria in Healdsburg; California. She also assisted in two O&M workshops at Fort McDowell, Arizona: one for Tribal wastewater collection system operators, and the other addressing the operation of extended aeration and sequencing batch reactor wastewater treatment plants. In addition, she researched and produced a presentation for the Circuit Rider drinking water program.

**Native American Burial Sites, California.** In 2003, Ms. McCollum was a field archaeologist for the excavation and analysis of human remains and associated burial items at several Native American burial sites. In Pleasanton, CA, for a site affected by the Canyon Oaks Development Project, her work included close coordination with the most likely descendants of local Miwok/Ohlone. For a new high school project in San Mateo in San Mateo, she worked with local Native American most likely descendants as the project paleontological monitor; and she participated in archaeological and historical site excavation, analysis, and mapping. For the West Bluffs Native American burial site in Playa Del Rey, CA, she coordinated with Gabrielino/Tongva most likely descendants for participated in archaeological and historical site excavation, analysis, and mapping, including the excavation of human remains and associated burial items; and she trained and supervised new crew members.

**Additional Archaeological Investigations, California.** From 2000 to 2003, as a contract archaeologist, Ms. McCollum conducted a variety of archaeological survey, excavation, analysis, and mapping tasks in compliance with environmental and historic preservation laws. The project sites were located at China Lake Naval Air Weapons Station and at Fort Irwin National Training Center; at United States Fish and Wildlife sites in El Dorado National Forest; in the Caltrans project area of Sonoma and Merced Counties; and in Calaveras and Solano Counties. In 2000, she also helped analyze Native American burial beads from Site CA-ALA-42 and helped prepare the site reports.

**Mount Pleasant Historic Site, Surry County, Virginia.** As a field archaeologist with the James River Institute for Archaeology, Ms. McCollum participated in the reconstruction of the

plantation grounds, gardens, and historic structures and performed artifact analyses at the Institute's laboratory; and contributed to site reports. On other assignments for the Institute, she conducted archaeological surveys, excavation, analyses, and mapping throughout Virginia.

**Volunteer Docent, Virginia and California.** As a volunteer docent with the Mariners' Museum in Newport News, Virginia, she conducted extensive research on the Chesapeake Bay region and helped educate the public on the history and prehistory of Chesapeake Bay. In Martinez, California, she was a volunteer docent and tour guide at the John Muir National Historic Site, working for the National Park Service.