

City of DuPont
1700 Civic Drive
DuPont, WA 98327



Phone: (253) 964-8121
www.dupontwa.gov

March 21, 2022

Report & Summary of the Scoping Process for the Pioneer Aggregates South Parcel Project Environmental Impact Statement

1. Introduction & Background Information

The purpose of this document is to summarize the comments received during the State Environmental Policy Act (SEPA) scoping period for the **Pioneer Aggregates South Parcel Project** Environmental Impact Statement (EIS), and to establish and document the areas of investigation that will be included in the EIS. This document also provides background information on the current proposal and the City's land use review process.

This report contains a detailed summary of the EIS scoping process, a summary of the comments received during the scoping comment period, and any revisions to the EIS scope based on public input received through the scoping process. **Attachment A** includes a table that shows the comment topics in each comment letter. **Attachment B** provides a table that lists specific comment themes. Additional information, including records of public notice actions, a complete mailing list, and a list of all the commenters on the EIS scope during the scoping period are available for review at the City of DuPont.

Project Background

CalPortland's original sand and gravel mine ("Existing Mine") was permitted in 1997 (355 acres). An EIS and Supplemental EIS were prepared for that proposal, which included construction of a dock at Tatsolo Point for shipment of mined material by barge. In 2006, the City amended its Comprehensive Plan to revise its overall land use plan to expand the City's Mineral Resource Overlay. The expanded Mineral Resource Overlay includes an approximately 200-acre area leased by CalPortland southeast of the Existing Mine ("South Parcel") and an approximately 201-acre area located north of the existing mine ("North Parcel"). After the City issued a Supplemental EIS (SEIS) for the South Parcel in 2007, CalPortland submitted permit applications to mine the South Parcel. In 2009, a group of environmental and conservation organizations formally disputed the South Parcel activities and mitigation measures proposed at the time. This dispute process resulted in the

2011 Settlement Agreement for DuPont Mine, Restoration of Sequalitchew Creek Watershed, and Preservation of Puget Sound Shorelands and Adjacent Open Space (2011 Settlement Agreement) that set forth a process for the submittal and review of permit applications (including SEPA review) for the North Parcel first and then the South Parcel. The Settlement Agreement was signed by a contingent of stakeholders, referred to as the environmental caucus, which consists of CalPortland, City of DuPont, Washington State Department of Ecology, Nisqually Delta Association, Washington Environmental Council, People for Puget Sound, Black Hills Audubon Society, Tahoma Audubon Society, Seattle Audubon Society, and the Anderson Island Quality of Life Committee. The Settlement Agreement also prescribed the process for the development, funding, and implementation of a Sequalitchew Creek Restoration Plan to help restore and enhance the Sequalitchew Creek watershed, including flows along the length of the Sequalitchew Creek. As provided for in the 2011 Settlement Agreement, in 2013 CalPortland applied for permits to allow mining within the North Parcel. Following publication of a Final EIS ("North Parcel EIS") in 2013, the North Parcel mining expansion was permitted in 2014. The North Parcel EIS contemplated mining the South Parcel as an independent but related proposal and evaluated the cumulative impacts of mining both the North and South Parcels. In May 2021, CalPortland applied for permits to allow mining within the South Parcel, as described below.

Current Proposal & Determination of Significance (DS)

The City of DuPont is the lead agency for SEPA review for projects within the city and is responsible for performing the statutory duties required for the ***Pioneer Aggregates South Parcel Project***. Barbara Kincaid, the City Community Development Director, is the designated Responsible Official for conducting SEPA review.

Based on review of the May 2021 application materials submitted on the current project, the City of DuPont, as SEPA lead agency, determined that this project may have significant adverse impacts on the environment, and that an EIS should be prepared, consistent with RCW 43.21C.030 (2)(c). The EIS will address probable significant adverse environmental impacts of the proposed ***Pioneer Aggregates South Parcel Project*** and will build upon the information and analysis in other environmental review for the mines, including the 1992 *Pioneer Aggregates Mining Facility and Reclamation Plan EIS*, 2006/2007 *Glacier Northwest Dupont Mining Area Expansion and North Sequalichew Resoration Project SEIS*, and the 2013 *CalPortland DuPont North Parcel Mining EIS*.

The City of DuPont initiated the EIS scoping process for the ***Pioneer Aggregates South Parcel Project*** on September 17, 2021, by carrying out the following actions:

- Issued a SEPA DS/Request for Comments on the Scope of the EIS. The DS/Request for Comments included notification of a public meeting on September 30, 2021, to provide the public with an opportunity to become more familiar with the proposal and to comment on the scope of the EIS. It also gave notice of the 30-day extended scoping period, ending on October 20, 2021 (the statutory requirement is for a 21-day scoping period). The DS/Request for Comments is available for review at:

https://www.dupontwa.gov/DocumentCenter/View/4891/Pioneer-Aggregates-So-Parcel-DS_PLNG2021-006

- Mailed copies of the DS/Request for Comments to federal, state, regional and local agencies, and tribes;
- Published the DS/Request for Comments in the WA State Department of Ecology's SEPA Register;
- Posted the DS/Request for Comments on the City of DuPont's website;
- Published the DS/Request for Comments in the *Tacoma News Tribune* (on September 18, 2021); and,
- Posted on the City of DuPont bulletin board

The EIS Scoping notification actions meet or exceed all applicable noticing requirements.

The DS/Request for Comments *preliminarily* identified two alternatives for analysis in the EIS:

- **Alternative 1 – No Action Alternative** – Assumes no mining on the South Parcel within the context of existing conditions.
- **Alternative 2 – Proposed South Parcel Project (With Restored Sequalitchew Creek)** – Implementation of proposed South Parcel Project within the context of creek restoration.

The DS/Request for Comments *preliminarily* identified the following elements of the environment for analysis in the EIS:

• Earth	• Noise
• Air Quality	• Land & Shoreline Use
• Surface Water and Groundwater	• Aesthetics
• Fisheries	• Cultural Resources
• Plants & Animals	• Transportation

2. EIS Scoping Process

Scoping provides notice to agencies, tribes, and the public that an EIS will be prepared for a proposal that is likely to cause a significant impact to the environment. The intent of scoping is to identify public, agency, and tribal comments and concerns on the environmental issues and alternatives that should be addressed in detail in the EIS.

The ***Pioneer Aggregates South Parcel Project*** scoping process provided opportunities for agencies, tribes, and interested members of the public to submit written comments via mail or email, a portal on the City's website, or on comment forms provided at a public open house.

A public scoping open house was held on September 30, 2021, from 6:00 to 8:00 at the City of DuPont Council Chambers. A total of 21 attendees signed in at the open house (the actual number of attendees may have been greater because not everyone may have elected to sign in). The open house was set up with boards representing the SEPA process and project. A continuous opportunity to provide written comments was provided throughout the open house. City staff and Pioneer

Aggregates representatives were available throughout the open house to answer questions about the SEPA process and the proposal, respectively.

Meeting materials were made available online at:

<https://www.dupontwa.gov/619/Pioneer-Aggregates-Project-Portal>

3. Scoping Comments Received

This section of the report provides a high level and general summary of the range of comments received during the EIS scoping process. More specific information about the categories of issues raised and the number of comments received for each category, is contained in **Appendix A** and **B**.

During the EIS scoping period, a total of 88 comment letters were received from 43 unique commenters (some individuals provided multiple comment letters). Comments were largely submitted by individuals (82 letters), with 6 letters from public agencies, Tribes, and organizations. Of the comment letters, 58 were received via email, 4 at the public open house, and 26 through the City's website portal.

All comment letters are available for review at City of DuPont.

Comments on SEPA Process

Several commenters had questions about the EIS Scoping process, including how to provide comments. Others requested that the EIS update technical information and analysis, and identify new, appropriate mitigation measures.

Comments on Alternatives

A couple of commenters requested that the EIS consider new alternatives. These comments included the following suggestions:

- Reduce the size of the proposed mining on the South Parcel and/or Existing Mine; and,
- Eliminate dewatering by wells and create a groundwater interceptor channel adjacent to the southeast shore of Edmond Marsh.

Comments About Impacts to the Environment

Most commenters expressed concerns about impacts that the proposal could cause to various elements of the environment. The chart below summarizes the number of letters received containing comments about a particular element of the environment (see **Appendix A** for details). More details about the comment themes are provided in **Appendix B**.

	Number of comment letters with comments on each element
Comments by SEPA Element of the Environment	
• Earth	16
• Surface Water & Groundwater	34
• Plants & Animals	27
• Air Quality/Greenhouse Gas Emissions	19
• Noise	11
• Land Use/Relationship to Plans and Policies	16
• Aesthetics	6
• Cultural Resources	9
• Parks and Recreation	5
• Transportation	6
• Public Services – fire service	4
• Utilities – potable water	6
• Economic/Fiscal Impacts	9

Following is a brief, high-level overview of concerns expressed in the comments.

Impacts to the Natural Environment

The project's impacts on the natural environment were a concern of the largest number of commenters. These concerns included impacts from mining and stormwater runoff on waterbodies on-site and in the vicinity (e.g., Sequalitchew Creek, Edmond Marsh, groundwater riparian seeps, and Puget Sound offsite, and the kettle wetland onsite). The indirect impacts of the project on aquatic species, including salmon and orca, in these waterbodies were noted by several commenters. The impacts of removing forest habitat onsite, including on Threatened, Endangered, Sensitive, Candidate, and Proposed (TESCP) species, was also mentioned.

Impacts to Land Use/Parks & Recreation

The compatibility of the proposed mining with surrounding and nearby uses, including residential uses (e.g., the Creekside Apartments) and recreational uses (e.g., the Sequalitchew Creek Trail) were a concern of many commenters. These commenters questioned the type of use, the increased activity level, and the buffers/ screening that would be provided

Impacts to Aesthetic Character/Scenic Experience

Several commenters questioned whether the project would affect the scenic and natural qualities of the DuPont area, particularly views of wooded areas.

Impacts to Cultural Resources

A couple of commenters requested an update to the cultural resources analysis to account for the potential impacts of the project on newly listed cultural resources located on and offsite.

Impacts to Public Infrastructure/Facilities, Air Quality, & Noise

A number of comments related to increased activity levels with the proposed project, including impacts on transportation/traffic, air quality, and noise. The air quality and noise impacts on nearby residential and recreational areas were a particular concern. A few comments centered on how the proposal would place a burden on existing public services and infrastructure and facilities, including fire service, roads/transportation facilities, and the City's and Joint Base Lewis-McChord's (JBLM's) water system.

Impacts to Economic & Fiscal Conditions

Several commenters expressed concern about the proposal's fiscal and economic impacts on City of Dupont. Questions were raised about the impacts of the project on businesses and tourism in DuPont, and on the ability of the City to attract new investment. Several commenters worried about the effects of the project on property and home values. Comments were also made about increased costs to the City (e.g., for maintenance of parks and open space due to blockage of flows in waterways and intrusion by invasive species, and maintenance of roads) without an increase in revenues from the project.

Comments Outside the Scope of SEPA

Support for or Opposition to the Proposal

Many commenters expressed general opposition to or support for the proposed project (Alternative 2). A total of 16 commenters indicated opposition to the proposal; no commenters expressed support for the proposal during the Scoping comment period (a comment letter in support of the project was received after the comment period ended). Expressions of support for or opposition to the proposal itself do not address environmental issues or provide information about the scope of the EIS, which are the focus of the scoping process. These comments are outside the scope of an EIS.

4. Conclusions/Revisions to the EIS Scope

This section of the report contains the City's conclusions about the scope of the EIS. These conclusions are based on consideration of public, agency, and Tribal comments submitted during the scoping process, and the requirements of SEPA.

SEPA Process

The City of DuPont used "reasonable methods" to inform the public and other agencies that an EIS is being prepared and a public scoping open house was being held. The City followed the noticing requirements listed in WAC 197-11-510 and the City Municipal Code.

The City has expressed its intent and commitment to prepare an EIS that is thorough and complete, but that also uses existing environmental information to the extent that it is relevant and valid. Use of existing environmental information is encouraged by the SEPA rules and is logical in the situation of the revised mining proposal.

The EIS will use and demonstrate the following approach for each element of the environment: (1) summarize existing conditions, updating as necessary; (3) identify any changes to regulations that may affect the current proposal; (4) indicate impacts of the current proposal; and (5) identify mitigation applicable to the current proposal.

The technical analyses that will be prepared in support of the EIS will be conducted by the Applicant's technical team using up-to-date methodologies and will comply with current regulations. The City has hired a team of highly-qualified technical professionals to provide peer review of the studies prepared by the Applicant's technical team. The peer review team will ensure that the studies have been prepared using appropriate methods and assumptions and are adequate and complete for purposes of SEPA review.

The City anticipates that the Applicant will provide analysis that is sufficient to prepare a project-specific EIS for the proposed project. To the extent that project-level analysis can be prepared in the EIS, future environmental review should not be necessary unless there are substantial changes to the proposal or if additional detailed information (e.g., detailed engineering due to monitoring results) is necessary in the future. The City will determine whether impacts have been addressed sufficiently in the EIS, or whether and what type of additional review is required by SEPA.

EIS Alternatives

The City of DuPont has determined that the two EIS alternatives initially identified for study in the EIS (**Alternative 1 – No Action Alternative**, and **Alternative 2 – Proposed South Parcel Project**) represent a reasonable number and range of alternatives for analysis in the EIS, as defined by the SEPA rules (WAC 197-11-440(5)).

Alternative 1 – No Action Alternative

This alternative is typically defined as what would most likely happen if the proposal does not move forward. According to the SEPA Rules, "no action" does not necessarily mean that nothing (no development in this case) would occur. The No Action Alternative that will be studied in this EIS will include discussion of possible future development of the South Parcel and Existing Mine properties in accordance with existing zoning. While it is unlikely that the Sequalitchew Creek Restoration Plan would be implemented if the proposal does not occur, it is possible that other funding (e.g., grants) could be obtained to carry out the Restoration Plan. Therefore, the No Action Alternative will reference the potential for the Sequalitchew Creek Restoration Plan to be implemented without the project.

Alternative 2 – Proposed South Parcel Project

The EIS will analyze the proposed South Parcel Project described in *Section 1* of this Scoping Summary. It is assumed that the Sequalitchew Creek Restoration Plan is not part of the proposal and, therefore, will not be analyzed as a component of the project. The Restoration Plan will be analyzed in the context of mitigation for the project's impacts on Sequalitchew Creek and associated water resources.

Possible Additional Alternatives

Reference will be made in the EIS to two possible additional alternatives that could reduce impacts on certain elements of the environment relative to the proposal: (1) less mining on the South Parcel and/or at the Existing Mine (e.g., less areal extent and/or depth of mining), and (2) no dewatering by wells for mining and creation of an interceptor channel southeast of Edmond Marsh to preserve the hydrology of the wetlands and Sequalitchew Creek. The EIS will indicate whether these are reasonable alternatives,¹ that are feasible and meet the Applicant's objectives at a lower environmental cost, requiring analysis in the EIS. In addition, in the course of EIS analysis mitigating measures will be identified. If a series of feasible mitigating measures taken together would constitute an alternative course of action, such an alternative may be identified in the course of EIS preparation.

Elements of the Environment

The greatest number of comments received during the public EIS scoping period expressed concerns regarding: **Earth, Surface Water & Groundwater, Plants & Animals, Air Quality, Noise, and Land Use/Relationship to Plans and Policies**. Other comments related to Aesthetics, Cultural Resources, Parks and Recreation, Transportation, Public Services (Fire Service), Utilities (Potable Water), and Fiscal/Economic Impacts. Most of the concerns fall within elements of the environment which were identified in the scoping notice for detailed study in the EIS.

Many comments raised specific concerns or variations on issues within the broadly defined EIS topic areas. These specific concerns have been used to expand or refine the scope of analysis for some environmental elements that were already identified for analysis. The scope additions include the following:

- Potential impacts on City of DuPont's and JBLM's potable water quantity and quality, including possible need for new water rights (this will be addressed in **Surface Water & Groundwater**); and
- Potential for increased fire hazard due to drying of Sequalitchew Creek ravine & climate change (this will be addressed in **Surface Water & Groundwater** and **Plants & Animals**).

An additional element of the environment, **Economic & Fiscal Conditions**, was identified by commenters for study in the EIS. This element will be added to the EIS, including analysis of the project's impacts on the local economy (e.g., jobs) and fiscal conditions (e.g., costs and revenues) in the City of DuPont.

¹ Per WAC 197-11-786, 197-11-440(5).

Other Elements of the Environment

The purpose of EIS scoping is to narrow the focus of an EIS to significant environmental issues and to eliminate insignificant impacts from detailed study (WAC 197-11-408). Thus, a SEPA EIS is not required to review every element of the environment listed in WAC 197-11-444 or DMC 23.01.110, or to review every concern that may be evaluated by decision-makers in making a decision about a project.

Several concerns expressed in scoping comments relate to the project's possible impacts on "quality of life" and property/housing values. Quality of life concerns will generally be addressed in the EIS under the elements of the environment currently identified for analysis, including the elements of Land Use, Air Quality, Noise, Transportation, and Plants & Animals. While property/housing values types of concerns may be considered and accounted for during the overall decision-making process for a project, a SEPA document is not required to evaluate them. Other considerations that are deemed outside the purview of SEPA include: methods of financing proposals, economic competition, profits and personal income and wages (WAC 197-11-448(3)), and monetary costs and benefits (WAC 197-11-450).

DMC 23.01.110 identifies economy, cultural factors, and social policy analysis as additional elements of the environment that may be studied in an EIS. The ***Pioneer Aggregates South Parcel Project*** EIS will include analyses of the project's potential impacts on cultural resources, and on the local economy and fiscal conditions in City of DuPont. The project is not expected to have significant impacts on social policy (e.g., environmental justice). Therefore, this element has not been included for analysis in the EIS.

Conclusion

In conclusion, the City of DuPont has determined the following:

1. The EIS will evaluate two alternatives: **Alternative 1 – No Action Alternative**, and **Alternative 2 – Proposed South Parcel Project**. Two other possible alternatives (1- less mining on the South Parcel and/or at the Existing Mine, and 2- no dewatering by wells for mining and creation of an interceptor channel southeast of Edmond Marsh) will be referenced in the EIS.
2. The EIS will analyze the following elements of the environment: **Earth, Air Quality, Surface Water & Groundwater, Fisheries, Plants & Animals, Noise, Land & Shoreline Use, Aesthetics, Cultural Resources and Transportation**. The City has also added the issue of **Fiscal & Economic Conditions** to the EIS. Two areas of the EIS analyses will be expanded: the Surface & Groundwater analysis will include the potential impacts on City of DuPont and JBLM's potable water quantity and quality; and the Surface & Groundwater and Plants & Animals analyses will include the potential for increased fire hazard in the Sequalitchew Creek ravine.

ATTACHMENT A

Public Scoping Comment Topic Areas

PIONEER AGGREGATES SOUTH PARCEL PROJECT EIS
Public Scoping Comment Topic Areas

	SEPA Process	Planning/Approvals	Mitigation Measures	For/Against	EIS Alts.	Earth	Surface Water & Ground-water	Plants & Animals	Air Quality/ GHGs	Noise	Land Use/ P & P	Aesthetics	Cultural Resources	Parks & Recreation	Transportation	Public Services (Fire)	Utilities (Potable Water)	Economic/Fiscal
Agencies, Tribes, Organizations																		
DNR (N. Damer)																		
Ecology (Z. Meyer) (2 letters)		X				X	X	X										
City of Dupont (R. Frederick)					X		X											
Nisqually Tribe (B. Beach)	X		X										X					
Tahoma Audubon (K. Kirkland)	X																	
Individuals																		
B. Ashendorf				X (A)		X*			X*	X*	X*							
R. Barrow		X*	X		X*	X	X	X	X	X*	X*						X	
L. Behnert				X (A)			X	X			X*							
R. Buck (2 letters)					X		X	X	X*									
E. Bundt				X (A)							X							
M. & K. Burch				X (A)		X	X	X	X	X					X		X	
E. & J. Chandler			X*			X	X	X*	X	X		X						
J. Colvin											X				X			
S. David				X (A)		X	X		X									
A. Elfrank							X	X	X							X		
B. Elliott (8 letters)	X	X	X			X	X	X	X	X	X					X		X
R. Forbes							X*				X*							
M. Gudaitis (2 letters)		X*	X*		X*		X	X*	X*					X*				
C. Harlow				X (A)			X					X	X					X
J. Hillsbery				X (A)		X*	X*	X*		X	X	X*		X				
B. King	X		X	X (A)	X		X	X	X	X				X		X	X	X
K. Kyer	X																	
K. Konrad				X (A)			X	X							X			X
A. Marlow				X (A)			X	X		X*	X*	X	X*					X
T., L., & K. Merritt (2 letters)		X*	X*		X*	X*	X	X	X	X	X	X	X*					X
C. Mitchell						X*	X	X*	X*		X							X
H. Muir		X*			X*		X	X*			X				X			
W. Noland		X*	X*				X*				X*							
K. Nolan							X		X									
J. Norris							X	X*	X	X								X
K. Novak			X		X		X	X	X	X					X		X	
K. Reidinger							X	X						X				
D. Russell (30 letters)				X (A)		X	X	X										
K. Schneider						X	X	X	X									
A. Schmauder						X		X										
C. Shoup (2 letters)				X (A)			X	X									X	X
N. Slattery		X*	X*	X (A)	X*	X*	X*	X*	X*	X*	X*	X*	X*			X*		
P. Stoltz		X																
S. Stugelmeyer				X (A)		X	X	X*	X		X*		X					
S. Thayer				X (A)			X	X										X
H. Thornton	X																	
K. Walsh (3 letters)				X (A)	X	X	X	X*	X	X					X	X		X
M. Winkler						X*	X	X			X							

X Specific comment(s) were made.

*X Topic area was noted on Comment Form, but specific comments were not made.

ATTACHMENT B

Public Scoping Comment Themes

PIONEER AGGREGATES SOUTH PARCEL PROJECT EIS
Public Scoping Comment Themes

Topic Area	Specific Themes
SEPA Process	
	<ul style="list-style-type: none"> • Questions regarding noticing of EIS scoping • Update EIS information & analysis, & identify new, appropriate mitigation measures • Interaction between previous EIS, previous agreements, & new EIS • Cumulative impacts
Alternatives	
	<ul style="list-style-type: none"> • EIS Alternative with less mining on South Parcel &/or Existing Mine • EIS Alternative with no dewatering for mining & intercepting groundwater southeast of Edmond Marsh to preserve hydrology of wetlands & Sequalitchew Creek
Permitting	
	<ul style="list-style-type: none"> • Need for permits for potential impacts on wetlands, solid waste management, toxics cleanup, water quality/industrial operations, & air quality.
Earth	
	<ul style="list-style-type: none"> • Impacts of removing topsoil & subsoil, including erosion & sedimentation • Potential for earth settlement & sink holes with dewatering
Surface Water & Groundwater	
	<ul style="list-style-type: none"> • Potential mining & groundwater dewatering/diversion impacts on waterbodies (e.g., Sequalitchew Creek, Edmond Marsh, on-site kettle wetland, groundwater riparian seeps), including impacts of groundwater drawdown & creation of North Sequalitchew Creek channel • Validity of groundwater modeling, including its application & assumptions (including historic hydrology & climate change assumptions) • Impacts of project on Sequalitchew Creek Restoration • Water quality impacts (e.g., on Sequalitchew Creek & Puget Sound), including pollution & increased temperature in the creek, saltwater intrusion into the aquifer, & desalination of the Sound • Potential for proposed stormwater infiltration facilities to silt up & cause flooding (causing impacts on City of DuPont's stormwater/flood management infrastructure) • Suggestions for water resources mitigation
Plants & Animals	
	<ul style="list-style-type: none"> • Impacts to threatened Endangered Sensitive Candidate & Proposed (TESCP) plant & animal species • Need for a more thorough survey of on-site wetland vegetation • Need for a comprehensive plant & wildlife survey

Topic Area	Specific Themes
	<ul style="list-style-type: none"> • Impacts on salmon habitat in Sequalitchew Creek
	<ul style="list-style-type: none"> • Impacts on plants (e.g., trees), fungi (mushrooms) & wildlife (e.g., deer, coyotes, bear, salmon, orca, seals, & water birds) onsite & in the site vicinity
	<ul style="list-style-type: none"> • Potential for introduction of invasive plant species in Edmond Marsh
	<ul style="list-style-type: none"> • Adequacy of proposed Wetland Mitigation Plan
Air Quality/GHGs	
	<ul style="list-style-type: none"> • Impacts of climate change in conjunction with proposed mining/groundwater dewatering plans
	<ul style="list-style-type: none"> • Dust impacts on nearby residential (e.g., Creekside Village) & recreational (e.g., Sequalitchew Creek Trail) areas
	<ul style="list-style-type: none"> • Suggestions for air quality mitigation
Noise	
	<ul style="list-style-type: none"> • Noise impacts on nearby residential (e.g., Creekside Village) & recreational (e.g., Sequalitchew Creek Trail) areas
	<ul style="list-style-type: none"> • Suggestions for noise mitigation
Land Use/Plans & Policies	
	<ul style="list-style-type: none"> • Impacts on nearby residential (e.g., Creekside Village & Edmond Village) & recreational (e.g., Sequalitchew Creek Trail) areas
	<ul style="list-style-type: none"> • Applicability of DuPont Critical Area Ordinance
Aesthetics/Light & Glare	
	<ul style="list-style-type: none"> • Impacts on scenic resources
Cultural Resources	
	<ul style="list-style-type: none"> • Update archaeological sites, roads, & paths on & near the site
	<ul style="list-style-type: none"> • Involve WA State Department of Archeology & Historic Preservation
	<ul style="list-style-type: none"> • Suggestions for cultural resources mitigation
Parks & Recreation	
	<ul style="list-style-type: none"> • Impacts on Sequalitchew Creek Trail users
Transportation	
	<ul style="list-style-type: none"> • Impacts of mining traffic on nearby road system & I-5 interchange
Public Services	
	<ul style="list-style-type: none"> • Potential for increased fire hazard due to drying of Sequalitchew Creek ravine & climate change
Utilities	
	<ul style="list-style-type: none"> • Impacts on City of DuPont's and JBLM's potable water quantity & quality, including possible need for new water rights
Economic/Fiscal Impacts	
	<ul style="list-style-type: none"> • Decrease in DuPont home values

Topic Area	Specific Themes
	• <i>Impacts on DuPont businesses & tourism</i>
	• <i>Impacts on DuPont taxpayers</i>
	• <i>Impacts on ability of DuPont to attract new investment</i>
	• <i>City maintenance costs (e.g., from invasive plants, beaver dams, blockage in Sequalitchew Creek & Edmond Marsh, road maintenance)</i>