



City of DuPont SEPA Checklist

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City File Number: _____

STATE ENVIRONMENTAL POLICY ACT ENVIRONMENTAL CHECKLIST

Purpose of Checklist:

The State Environmental Policy Act (SEPA), chapter 43.21 C, RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instructions to Applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

A BACKGROUND

1. Name of proposed project, if applicable:

Founder's Ridge

2. Name of applicant:

NorthPoint Development

3. Address and phone number of applicant and contact person:

Applicant: Johnny Sweeney Jr.
NorthPoint Development
4825 N.W. 41st Street, Suite 500
Riverside, MO 64150
385-351-9665

Contact: Ben Eldridge
Barghausen Consulting Engineers
18215-72nd Avenue South
Kent, WA 98032
425-251-6222

4. Date checklist prepared:

July 13, 2021, *Revised November 23, 2021*

5. Agency requesting checklist:

City of DuPont

6. Proposed timing or schedule (including phasing, if applicable):

Construction to start in *spring of 2023* or as soon as applicable permits are issued.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

There are no current plans for future additions or expansions related to this project under the proposed application. The Founder's Ridge project is part of a potential larger Master Plan Development which may be developed in the future under separate applications. This current proposal is wholly contained and does not depend upon any future development.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Environmental Checklist

Geotechnical Engineering Report

Cultural Resources Study

Wetland and Fish and Wildlife Habitat Assessment and *Voluntary Bat Habitat Restoration Plan* (Soundview Consultants, 2022)

Certified Arborist Report (Soundview Consultants, 2022)

Stormwater Site Plan

Stormwater Pollution Prevention Plan

Noise Study

Traffic Impact Analysis

Preliminary Economic Impact Analysis (Toyer Strategic Advisors, Inc., 2021)

Photometric/Lighting Study

Phase I Environmental Site Assessment

Phase I Archaeological Survey

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

A Cleanup Action Plan (CAP) was established by Washington State Department of Ecology and clean up on the site was completed under a Consent Decree.

10. List any government approvals or permits that will be needed for your proposal, if known.

Environmental Determination by City of DuPont
Building Permits by City of DuPont
Plumbing/Electrical/Mechanical Permits by City of DuPont
Type I Design Review Approval by City of DuPont
Type II Site Plan Approval by City of DuPont
Grading Permit by City of DuPont
Site Development Permit by City of DuPont
Right-of-Way Use Permit by City of DuPont
Water Main Extension by City of DuPont
Water Service Connection by City of DuPont
Pre-Treatment Review by Pierce County
Sanitary Sewer Extension by Pierce County
Sanitary Sewer Permit by Pierce County
Tree Modification Permit by City of DuPont
Preliminary Plat Approval by City of DuPont
NPDES Permit by Department of Ecology

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposed Founder's Ridge is located on an approximate 123.6-acre site within the City of DuPont, Pierce County, Washington. The project will encompass 123.6 acres and will include the construction of four light manufacturing use buildings along with grading activities, stormwater facilities, extension of water and sanitary sewer services, landscaping, open space and pedestrian amenities, franchise utility extensions and roadway improvements. Past use of the site created known environmental hazards and clean up and remediation as outlined by the Department of Ecology was completed. Additional environmental cleanup is proposed as part of a potential larger master planned development and anticipated to be begin during the construction of Founder's Ridge to recover the site for safe use for housing and commercial development. It is expected that when cleanup is completed and infrastructure is in place, the land use restrictions will be lifted and development of surrounding areas can proceed.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposal is located on the west side of Center Drive and to the south of Sequalitchew Creek and to the east of Home Course Golf Course and is within a portion of Sections 26 and 27, Township 19 North, Range 1 East, W.M. in the City of DuPont, Pierce County , Washington.

Tax Parcel No. 011927-2005

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site:

(Circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

The steepest slope on site is approximately 30 percent.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

In general the soil conditions consist of outwash sand and gravel with some inorganic fill material consisting of silty sand, sand and gravel.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

None are known to exist to our knowledge.

e. Describe the purpose, type, total area and approximate quantities and total affected area of any filling, excavation and grading proposed. Indicate source of fill.

Approximately 250,000 cubic yards of cut and 250,000 cubic yards of fill will be used to prepare the site for future building construction. Approximately 75,000 cubic yards of unsuitable stripping material may be required to be exported from the site to an approved source. The site will be designed to balance the earthwork as close as possible. However, there may be a need to import some fill material estimated in the range of 50,000 cubic yards to 100,000 cubic yards. The source of import fill (if needed) is not yet known but would be from an approved source.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Yes, depending on weather conditions at time of construction, erosion could occur as a result of construction activities.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Approximately 53 percent of the site will be impervious surface upon project completion.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

A temporary erosion and sedimentation control plan will be designed per City of DuPont standards and implemented on the site to control erosion impacts.

2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities, if known.

During the construction phase, emissions from construction equipment would be present. Emissions from vehicular traffic to and from the site would be present upon project completion.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

Emissions from vehicular traffic in the area would be present but would not be anticipated to affect the project.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Construction equipment will meet state and local emission standards. No other specific measures are proposed.

3. Water

- a. Surface:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

No streams or wetlands are located in the project area. One Category III wetland (Offsite Wetland A – known locally as Old Fort Lake) is located offsite to the west of the project area.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No work will be conducted within 200 feet of any waters.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No fill or dredge will be placed in or removed from any surface waters.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities, if known.

No surface water withdrawals or diversions are proposed.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No part of the Phase I portion of the site is located in a 100-year flood plain per FIRM map panels 53053C0596E and 53035C0507E, dated March 7, 2017.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No waste materials will be discharged to surface waters.

b. Ground:

- 1) Will ground water be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities, if known.

No ground water will be withdrawn or water discharged to ground water.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals;... agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

No waste materials will be discharged to the ground.

c. Water Runoff (including storm water):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The source of runoff will be rainfall from building rooftops and pavement areas. Stormwater will be collected via catch basins and storm pipe and routed to water quality vaults for water quality treatment prior to release to the ground via infiltration ponds.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

No waste material will enter ground or surface waters. All sanitary sewer effluent will be collected via tight line pipe and routed to the sanitary sewer system.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

The proposed project will be designed to maintain current drainage patterns.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, and drainage pattern impacts, if any:

A temporary erosion and sedimentation control measures will be implemented per City of DuPont standards for the construction phase of the project and a storm water system will be designed and implemented per city standards to control storm water runoff from the completed project.

4. Plants

a. Check or circle types of vegetation found on the site:

- deciduous tree: Oregon White Oak, Black Cottonwood, Big Leaf Maple
- evergreen tree: Douglas Fir, Yew
- shrubs
- grass
- pasture
- crop or grain
- Orchard, vineyards or other permanent crops
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

Vegetation to be removed consists of various types of existing vegetation onsite. Please see the *Certified Arborist Report* (Soundview Consultants, July 2022) for details regarding the existing tree inventory and plans for tree removal.

c. List threatened and endangered species known to be on or near the site.

No threatened and endangered plant species are known to be on or within 200 feet of the site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

The proposed project will plant and preserve native trees and shrubs as part of onsite habitat protection and enhancement. Please see *Wetland and Fish and Wildlife Habitat Assessment and Voluntary Bat Habitat Restoration Plan* (Soundview Consultants, July 2022) and the *Certified Arborist Report* (Soundview Consultants, 2021) for additional details.

e. List all noxious weeds and invasive species known to be on or near the site.

The following noxious weeds and invasive species are present onsite: Scotch broom (*Cytisus scoparius*), butterfly bush (*Buddleja davidii*), Himalayan blackberry (*Rubus armeniacus*), and hairy cat's ear (*Hypochaeris radicata*).

5. Animals

a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

Examples include:

birds: Hawk, Heron, Eagle, Songbirds, other:

mammals: deer, bear, elk, beaver, other: rodents

fish: bass, salmon, trout, herring, shellfish, other:

- b. List any threatened or endangered species known to be on or near the site.

No known threatened or endangered animal species are known to be on or within 200 feet of the site.

- c. Is the site part of a migration route? If so, explain.

The site is part of the regional Pacific Flyway for birds.

- d. Proposed measures to preserve or enhance wildlife, if any:

The Applicant voluntarily proposes to preserve and enhance a portion of the project area for bat habitat. Please see *Wetland and Fish and Wildlife Habitat Assessment and Voluntary Bat Habitat Restoration Plan* (Soundview Consultants, July 2022) for additional details.

- e. List any invasive animal species known to be on or near the site.

No known invasive animal species are known to be on or near the site.

6. Energy and Natural Resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Natural gas will be used for heating and electricity will be used for lighting and overall energy needs.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe:

It is not anticipated that the proposed project would affect potential use of solar energy by adjacent properties. The tallest structure on the site would be approximately 50 feet.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

High-efficiency indoor LED lighting will be installed throughout the buildings.

7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

No.

- 1) Describe any known or possible contamination at the site from present or past users.

Please see Section 2 of the PERC Closure Report (attached). Section 2 is named Commercial Area Remediation. See Figure 2-1 (Commercial Area Remediation Units). As shown on this figure, the commercial areas labeled CM-04, CM-05, and a part of CM-08 were previously part of the DuPont Works at the site. See page ES-2 of the executive summary, which explains that soil cleanup and removal has taken place in these 3 CUs to remove contamination.

The CU areas were cleaned up between 1991 and 2006, and now meet compliance with cleanup levels set forth on Table 2-1 (attached). The PERC 2007 Closure Report concludes “These concentrations document that Site remediation in the CM Area was completed in compliance with the Cleanup Action Plan (CAP) established by Ecology in 2003, and show that these areas are ready for future commercial development.

This cleanup was performed under Consent Decree with WA State Department of Ecology.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None are known to exist to our knowledge.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project’s development or construction, or at any time during the operating life of the project.

There are low level concentrations of metals in some limited areas of the development parcel. The metals arsenic, lead, and copper are present, but at concentrations below the cleanup limits on Table 2-1 (attached). Tables B.4, B.5, and B.8 of the Report show the cleanup confirmation soil sample results which demonstrate the compliance with CULs.

Figures B-4, B-5, and B-8 of the Report show the locations of the extensive soil sampling that was completed to demonstrate compliance with CULs.

No toxic, or hazardous chemicals are expected to be stored, used, or produced during the project’s development, construction, or during the operating life of the project.

- 4) Describe special emergency services that might be required.

Other than fire, police and medical services already available in the area, no other emergency services are expected to be required.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

Any excavation activities will use typical dust suppression/reduction techniques.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Noise in the area is primarily associated with traffic along Center Drive which will not affect the project.

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Unless otherwise authorized by the city, temporary construction noise can be expected between 7:00 am and 9:00 pm, Monday to Friday, and 7:00 and 7:00 pm Saturday and Sunday (as may be needed), until such time as the project and its improvements are built. Construction noise will implement best management practices as recommended in the Noise Study and will comply with DuPont Municipal Code and WAC 173-60.

Applicant will be developing *light manufacturing use* buildings with end users (tenants) as permitted by code. Such uses may generate a mix of vehicular and truck traffic. It is expected that the primary sources of noise post-construction will include activity at loading docks, as well as safety and warning devices on vehicles and trucks. Long-term noise from the project will implement the recommendations within the Noise Study, as well as comply with DuPont Municipal code and WAC 173-06.

- 3) Proposed measures to reduce or control noise impacts, if any:

Applicant will use best management practices and follow the recommendations within the noise study to reduce and control noise to comply with DuPont Municipal Code and WAC 173-60.

8. Land and Shoreline Use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The site is vacant land. The Home Course Golf Course is located to the north, northeast, east and west and residential use is located to the south.

- b. Has the site been used as working farmlands or forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The site has not been a working farm or managed forest land in recent years or in the past to the best of the applicant's knowledge.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

The site has not been a working farm or managed forest land to our knowledge.

- c. Describe any structures on the site.

There are no structures located on the site.

- d. Will any structures be demolished? If so, what?

No structures will be demolished.

e. What is the current zoning classification of the site?

The current zoning classification is Mixed Use Village 5 (MUV-5).

f. What is the current comprehensive plan designation of the site?

The current comprehensive plan designation is Old Fort Lake #2 (OFL-2).

g. If applicable, what is the current shoreline master program designation of the site?

N/A

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

To our knowledge, no part of the project area has been designated as a critical area by the city or county.

i. Approximately how many people would reside or work in the completed project?

Based on the current site plan and an economic impact analysis completed by Toyer Strategic Advisors, Inc., the applicant anticipates that approximately 474 jobs will be created within the completed development. There is no residential component to the proposed development.

j. Approximately how many people would the completed project displace?

No persons will be displaced.

k. Proposed measures to avoid or reduce displacement impacts, if any:

No specific measures are proposed.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The proposed development of *light* manufacturing use buildings is an allowed use in the zone and will be designed to comply with current zoning and design standards.

m. Proposed measures to ensure that proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

There are no working farm or managed forest lands near the site to our knowledge.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

N/A

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

N/A

- c. Proposed measures to reduce or control housing impacts, if any:

N/A

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The tallest proposed structure would be approximately 50 feet. All buildings shall be constructed of concrete wall panels with a cement-based acrylic coating to provide texture.

- b. What views in the immediate vicinity would be altered or obstructed?

Views from adjacent properties in the immediate vicinity of the project would be altered but would not be anticipated to be completely obstructed.

- c. Proposed measures to reduce or control aesthetic impacts, if any:

The buildings are a high-quality architectural design. The design includes details, patterns, colors, and horizontal and vertical articulation that are appropriate for the scale and the use of the buildings. The front and side facades have vertical and horizontal offsets that are accented by score lines, windows, and changes in color. The combination of the vertical and horizontal offsets and accents provide scale, balance, rhythm, and interest to the façade. The design is appropriate for the scale and use of the buildings and will comply with established city design standards for light manufacturing industrial development.

High quality landscaping will be installed throughout the development which will help screen the parking areas. Increased setbacks will be used, and screening walls will be built to hide docking areas.

11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Glare from building window glass could be present during daylight hours and light from buildings and parking lot lighting would be present during early morning and evening hours.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

It is not anticipated that any potential light or glare produced by the proposed project would be a safety hazard.

- c. What existing off-site sources of light or glare may affect your proposal?

Light from vehicular traffic on area roadways may be present but would not be anticipated to be a safety hazard.

- d. Proposed measures to reduce or control light and glare impacts, if any:
Window glass will be non-glare and lot lighting will be shielded and directed toward the site. The use of on-site perimeter landscaping will help to contain any light produced by the proposed project to within the site.

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?

The Home Course Golf Course is adjacent to the site to the west.

- b. Would the proposed project displace any existing recreational uses? If so, describe.

No recreational uses will be displaced.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

No specific measures are proposed.

13. Historic and Cultural Preservation

- a. HRA has identified six previously undocumented sites within the project's area of impacts as a result of two phases of survey-level archaeological investigations (see 13d). The sites consist of one precontact archaeological site consisting of two lithic cobble flakes (Site 45PI221), one historic-period archaeological site consisting of three bottles (Site 45PI510), one precontact archaeological isolate consisting of a single precontact flake (Isolate 45PI209), one historic-period culturally modified tree (CMT) (Site 45PI1524), one historic-period site consisting of a pit feature with glass and metal artifacts (Site 45PI1571), and one precontact site consisting of two lithic cobble flakes (Site 45PI1572).

HRA has recommended that Isolate 45PI209, Site 45PI1221, Site 45PI1510, Site 45PI1571, and Site 45PI1572, are not eligible for listing in the National Register of Historic Places (NRHP) and need not be avoided by project ground disturbing activities. HRA recommended that Site 45PI1524 is potentially eligible for listing in the NRHP and should be avoided by project ground disturbing activities. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe.

Previous archaeological investigations in the vicinity of the Founder's Ridge project's area of impacts (AI) have also identified myriad archaeological sites over the years. There are 62 previously documented archaeological resources within 1 mile of the AI (see Table 13-1). The sites consist of 49 historic-period archaeological sites and isolates and 13 precontact archaeological sites. The three sites closest to the AI are Sites 45PI70, 45PI563, and 45PI712. Site 45PI70 (see above section on previous cultural resources studies) is the location of the former DuPont Works Site and formerly contained the remnants of the industrial facility that operated between 1906 and 1977. The site has been determined not eligible for listing in the NRHP and was destroyed during soil remediation work conducted in the 2000s (Thompson 2006). Site 45PI563 is a scatter of historic-period glass, ceramic, and metal artifacts dating from the 1840s to the 1930s (encompassing periods associated with both Hudson's Bay Company [HBC] and the DuPont Works Site) in a disturbed setting that overlaps with the western edge of the AI. This site has been tested and determined not eligible for listing in the NRHP (HRA 2002a). Site 45PI712 consisted

of the skeletal remains of two individuals attributed to the historic period or perhaps earlier and is located within 100 meters (m) to the east of the AI (Wessen 2003b).

| Site Number | Site Type | Reference | NRHP and/or WHR Eligibility Status | |
|--------------------|----------------------------|----------------------------------------|-------------------------------------------|-----|
| 45PI54 | Shell midden | Kavanaugh 1976 | NRHP Listed | |
| 45PI56 | Fur trading post/farm | Riordan 1977a | WHR Listed | |
| 45PI57 | Historic boarding house | Riordan 1977b | Determined Eligible | Not |
| 45PI58 | Historic dump | Riordan 1977c | Determined Eligible | Not |
| 45PI59 | Historic dump | Riordan 1977d | Determined Eligible | Not |
| 45PI60 | Historic dump | Riordan 1977e | Determined Eligible | Not |
| 45PI61 | Historic dump | Riordan 1977f | Determined Eligible | Not |
| 45PI62 | Historic dump | Riordan 1977g | Determined Eligible | Not |
| 45PI63 | Historic dump | Riordan 1977h | Determined Eligible | Not |
| 45PI64 | Historic dump | Riordan 1977i | Determined Eligible | Not |
| 45PI65 | Historic dump | Riordan 1977j | Unevaluated | |
| 45PI66 | Historic mission | Riordan 1977k | Determined Eligible | |
| 45PI67 | Historic surveying station | Riordan 1977l | Determined Eligible | |
| 45PI68 | Historic farmstead | Riordan 1977m | Determined Eligible | Not |
| 45PI69 | Historic town site | Riordan 1977n | Unevaluated | |
| 45PI70 | Historic industrial area | Riordan 1977o; Shaw and Silverman 2008 | Unevaluated | |

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|---------|----------------------------------------------------------|---------------------------------------|---------------------|-----|
| 45PI71 | Historic sawmill | Daugherty 1993a | Determined Eligible | Not |
| 45PI72 | Precontact shell midden | Blukis Onat 1977a; Wessen 2002a | Determined Eligible | |
| 45PI73 | Historic building | Blukis Onat 1977b | Unevaluated | |
| 45PI74 | Historic midden | Blukis Onat 1977c; Daugherty 1992c | Unevaluated | |
| 45PI75 | Precontact shell midden | Blukis Onat 1977d | Determined Eligible | Not |
| 45PI76 | Precontact burial site | Blukis Onat 1977e | Unevaluated | |
| 45PI77 | Precontact burial site | Blukis Onat 1977f | Unevaluated | |
| 45PI78 | Precontact burial site | Blukis Onat 1977g | Unevaluated | |
| 45PI401 | Historic domestic/ institutional housing structure | Welch 1988a | Unevaluated | |
| 45PI404 | Precontact burial site | Welch 1988b | Unevaluated | |
| 45PI405 | Historic domestic/ institutional housing structure | Welch 1988c | Unevaluated | |
| 45PI413 | Cemetery | Daugherty 1991 | Unevaluated | |
| 45PI414 | Precontact shell midden | Daugherty 1993b | Unevaluated | |
| 45PI440 | Historic artifact scatter | Solimano 1995 | Unevaluated | |
| 45PI441 | Historic road | Solimano 1996 | Unevaluated | |
| 45PI448 | Historic garbage dump | Daugherty 1996a | Determined Eligible | Not |
| 45PI449 | Historic farmstead | Daugherty 1996b | Determined Eligible | Not |
| 45PI450 | Historic structure | Daugherty 1996c | Unevaluated | |
| 45PI451 | Historic burial Site | Daugherty 1997a | Unevaluated | |
| 45PI452 | Historic road | Daugherty 1997b | Unevaluated | |

| | | | |
|----------|-------------------------------------------|-----------------------------------|----------------------------|
| 45PI453 | Historic observatory | Daugherty 1998a | Unevaluated |
| 45PI454 | Historic homestead | Daugherty 1998b | Unevaluated |
| 45PI455 | Historic military camp | Daugherty 1997c | Unevaluated |
| 45PI484 | Historic cache | Daugherty 2000a | Unevaluated |
| 45PI485 | Precontact shell midden | Daugherty 2000b; Wessen 2002b | Unevaluated |
| 45PI486 | Historic drainage ditch | Daugherty 2001a | Unevaluated |
| 45PI487 | Historic trash dump | Daugherty 2001b | Unevaluated |
| 45PI563 | Historic artifact scatter | Chesmore and Wilson 2002 | Determined Not Eligible |
| 45PI576 | Precontact lithic material | Wessen 2004 | Unevaluated |
| 45PI711 | Historic burial site | Wessen 2003a | Unevaluated |
| 45PI712 | Historic or precontact burial site | Wessen 2003b | Unevaluated |
| 45PI713 | Precontact shell midden | Chesmore 2002 | Unevaluated |
| 45PI773 | Precontact lithic material site | Wessen 2005 | Unevaluated |
| 45PI781 | Historic debris scatter/ concentration | Bartel 2006 | Unevaluated |
| 45PI783 | Historic debris scatter | Hoffman and Thompson 2007 | Unevaluated |
| 45PI922 | Historic scatter | Baumgartner and Silverman 2007 | Unevaluated |
| 45PI969 | Historic isolate | Knutson 2008 | Unevaluated |
| 45PI1186 | Historic industrial | Gall 2010a | Unevaluated |
| 45PI1224 | Historic railroad properties | Arrington 2010a | Unevaluated |
| 45PI1225 | Historic railroad properties | Arrington 2010b | Unevaluated |

| | | | |
|----------|------------------------------|--------------------------|-------------------------|
| 45PI1226 | Historic railroad properties | Arrington 2011 | Unevaluated |
| 45PI1227 | Historic isolate | Arrington 2010c | Unevaluated |
| 45PI1228 | Historic isolate | Arrington 2010d | Unevaluated |
| 45PI1229 | Historic isolate | Arrington 2010e | Unevaluated |
| 45PI1333 | Historic public works | Gebhardt and Gilpin 2014 | Determined Not Eligible |
| 45PI1361 | Historic isolate | Gebhardt et al. 2014 | Unevaluated |

The historic-period sites and isolates include the locations of former HBC Fort Nisqually facilities (e.g., Site 45PI54, Site 45PI405, Site 45PI453) and numerous other sites and isolates with cultural material related to the fort occupation and later historic developments, such as the DuPont explosives plant, which operated from the early to late twentieth century (Thompson 2006; Welch 1988c).

The majority of the precontact sites in the area are shell middens, including a midden associated with the Nisqually Indian Sequalitchew village (Site 45PI54) (Kavanaugh 1976). An additional precontact camp (Site 45PI777 [Hoffman Hill Site]) with intact cultural deposits securely dated to periods between 1889 to 1775 years before present (B.P.) and between 505 and 331 B.P. is also located approximately 1.5 miles southwest of the AI (Kaehler et al. 2008).

Numerous burials have also been documented in the AI vicinity. These are discussed in 13b.

- b. Are there any landmarks, features or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

In addition to the archaeological sites detailed in 13a, numerous historic-period burials have also been documented in the AI vicinity. Most notable is a group of 28 burials inadvertently discovered during highway construction in the early 1990s (Site 45PI413). The burials have been attributed to the 1843 Fort Nisqually Native American cemetery associated with a period between the 1840s and 1870 (Daugherty 1991). Previously documented historic-period burial sites in the vicinity also include two inadvertent discoveries of individual burials, one located north of the AI (Site 45PI711), and one located east of the AI (Site 45PI451) (Daugherty 1997a; Wessen 2003a).

In addition, there are also five recorded precontact to historic-period Native American burial sites (Sites 45PI76, 45PI77, 45PI78, 45PI404, and 45PI712) in the vicinity (Blukis Onat 1977e, 1977f, 1977g; Welch 1988b; Wessen 2003b). Site 45PI712 consisted of the skeletal remains of two individuals attributed to the historic period or perhaps earlier (Wessen 2003b). The other burial site locations are to the west (Sites 45PI404 and 45PI77), southeast (Site 45PI78), and northwest (Site 45PI78) of the AI. Two of these sites were inadvertent discoveries of human remains (Site 45PI404 and Site 45PI712), and the others were recorded based on reported locations of graves (Sites 45PI76, 45PI77, and 45PI78) in order to alert researchers to the high potential for burials at these locations.

More generally, Carpenter (1991) noted that at least 72 individuals are believed to have been buried within the Fort-Nisqually-DuPont site between 1833 and 1887, based on extensive research of historic documents. The individuals buried include Native Americans (many of whom were Nisqually), British HBC employees, and European Americans. Many of these individuals were considered to have been interred within the 1843 Fort Nisqually Burial Grounds located south of the 1843 Fort Nisqually site near the entrance of the former DuPont Works Site (Carpenter 1991). This location is labeled as the “Sequalitchew Cemetery” on the 7.5-minute U.S. Geological Survey (USGS) quad map of the area (USGS 1997). Historic-period cemetery Site 45PI413, located east of the AI, has also been attributed to this burial ground. The approximate location of the Fort Nisqually Burial Grounds is also where Bowman (2017) identified anomalies indicative of human burials in a ground-penetrating radar (GPR) study and overlaps with the eastern part of the AI. The inadvertently discovered historic-period to precontact burial site 45PI712 is within this general area as well (Wessen 2003b).

- c. Describe the methods used to access the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archaeology and historic preservations, archaeological surveys, historic maps, GIS data, etc.

The information provided in 13a and 13b was gathered from the Washington Department of Archaeology and Historic Preservation’s (DAHP) online database Washington Information System for Architectural and Archaeological Records Data (WISAARD). In addition, Historical Research Associates, Inc. (HRA), has been communicating with the Nisqually Tribe and DAHP regarding the project and planned fieldwork (see 13d).

- d. The project proponent (NorthPoint Development) contracted with HRA to conduct field survey to search for potential archaeological sites within the entire AI and to further define the extent of the reported burial area identified by previous researchers (see 13b) and the Nisqually Tribe (Phase 1). The Phase 1 field investigations identified four previously undocumented archaeological resources within the project AI: one precontact archaeological site (Site 45PI221), one historic-period archaeological site (Site 45PI510), one precontact archaeological isolate (Isolate 45PI209), and one historic-period culturally modified tree (CMT) (Site 45PI1524).

HRA recommended that the previously undocumented precontact archaeological site (Site 45PI221), precontact archaeological isolate (Isolate 45PI209), and historic-period archaeological site (Site 45PI510) were not eligible for listing in the NRHP or the Washington Heritage Register (WHR). HRA recommended no further archaeological work for these resources. HRA recommended that the previously undocumented CMT (Site 45PI1524) is potentially eligible for listing in the NRHP and WHR and should be avoided by ground-disturbing activities.

The Phase 1 survey also identified two areas that were determined to have a high potential to contain human burials: one identified based on the presence of previously documented ground-penetrating radar (GPR) anomalies indicative of human burials and one suspected of being a burial area north of the anomalies by Nisqually Tribal Historic Preservation Office (THPO) staff. HRA examined these areas in a Phase 2 archaeological survey. In accordance with the original and amended Phase 2 archaeological survey workplan for the Project, HRA conducted a pedestrian survey and excavations within the potential burial areas to identify and demarcate potential burial locations within the alignment of two proposed project access roads (Road #1 and Road #2).

The results of the surface examination and excavations indicate that there is no evidence that the GPR anomalies overlapping both proposed road alignments for the Project represent human burials, as no evidence of burial features was encountered during the examination of their locations. In addition, HRA identified no evidence of burial features overlapping the proposed Road #2 alignment in the area north of

the anomalies that was also suspected of containing burials based on consultation with THPO staff for the Nisqually Indian Tribe during the Phase 1 survey.

Excavations for this Phase 2 work did result in the identification of one historic-period archaeological site (Site 45PI1571) and one precontact archaeological site (Site 45PI1572), both of which are interpreted as being unrelated to any burial features.

HRA recommended that the newly identified historic-period archaeological site (Site 45PI1571) and precontact archaeological site (Site 45PI1572) were not eligible for listing in the NRHP or the WHR. HRA recommended no further archaeological work for these resources.

During the course of the Phase 2 work, Nisqually THPO staff identified one additional area that may contain human burials. This area had been examined during the Phase 1 work, outside of the area of the Phase 2 investigations.

HRA recommended avoidance by ground disturbing activities of GPR anomalies outside of the proposed road alignments and current project plans that were not examined during the Phase 2 investigations. In addition, HRA recommended archaeological monitoring during ground-disturbing activities in two areas identified by Nisqually THPO staff as likely to contain human burials and monitoring during ground-disturbing activities in the area of the investigated GPR anomalies due to concerns expressed by Nisqually Indian Tribe THPO staff that there could still be burials near these anomalies. HRA also reiterated the recommendation that Site 45PI1524 should be avoided by ground-disturbing construction.

Revising the site plan to avoid Site 45PI1524 and plans for archaeological monitoring will be determined in consultation with DAHP, the City, and the affected Tribes.

14. Transportation

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Access to the site is provided by a new public roadway to Center Drive.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Transit service is not available to the site. The closest transit route is Route 592 with a stop at the park and ride located at Wilmington Drive and Palisades Drive.

- c. How many parking spaces would the completed project or non-project have? How many would the project eliminate?

A total of approximately 918 vehicular parking stalls and 266 trailer stalls will be constructed for the business park/light *manufacturing* portion of the development. No parking will be eliminated.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

New public roadway construction designed to meet City of DuPont standards is proposed to provide direct access for the project from Center Drive.

- e. Will the project or proposed use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The site will generate 3,968 Average Weekday Daily Trips (AWDT) of which 560 will occur during the AM peak-hour between 7-9 AM and 536 will occur during the PM peak-hour between 4-6 PM. The anticipated percentage of truck trips will be 10 percent. The trip generation data is based on the Institute of Transportation Engineers' (ITE) Trip Generation 10th Edition + Supplement (2020) and the truck percentages are based on weekday truck percentage data in ITE Journal March 2020.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

There are no working farm or managed forest land near the site to our knowledge.

- h. Proposed measures to reduce or control transportation impacts, if any:

The construction of new roadways and payment of traffic impact fees will reduce transportation impacts of the project.

15. Public Services

- a. Would the project result in an increase need for public services (for example, fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The proposed development may result in limited need for increases to public service; however, the project will be a positive economic benefit for most public services, providing one-time and recurring tax contributions as described in 15b. Limited potential impacts could include:

1. Fire and EMS. The proposed development is not of a size, scope or use that is inconsistent with the capabilities of the fire apparatuses and equipment of the local fire protection district. Further, each building will have an Early Suppression Fast Response (ESFR) fire sprinkler system, monitoring and suppression system. The project could result in very minimal, if any, additional calls to EMS for work related injuries.
2. Schools (K – 12). The project does not include any residential development and will not contribute to the student generation rate of local K – 12 schools. Although the site is located near Pioneer Middle School (PMS), the proposed development is not anticipated to have any impacts that disrupt or impair public services. In accordance with the Noise Study completed for this proposal, the development is not expected to have an impact on PMS.
3. Post-Secondary Schools. The jobs created by this project will require semi-skilled, high-skilled, and professional workers with varying post-secondary certificates or degrees. However, it is not likely the projected 474 jobs will result in demand that cannot be accommodated by existing public and private institutions, training programs, etc.

4. Police. Light manufacturing development of this type is very unlikely to generate additional calls for services from police; however, alarm systems used by future tenants may result in some additional activity. DuPont Municipal Code Chapter 9.15 requires all such alarm systems to be permitted by the City and the City maintains a fee schedule for assessing fines for false alarms to (a) encourage owners to maintain said systems and (b) cover some of the cost of the call for service.
5. Transit. Public transit is not currently provided to this area and future development will not result in an immediate need for transit services.
6. Park and Recreation. The addition of approximately 474 new jobs in the area will not result in an increased demand for new Parks and Recreation facilities. The project will include sidewalks and walking paths consistent with a light manufacturing development, which will allow future employees the opportunity to walk during their lunch hour. This may include some walks to nearby park facilities, but it is very unlikely to cause any measurable impact.
7. Utilities. Stormwater and other utilities will be extended to the development and/or addressed throughout on-site systems. This project will not result in any impacts to utility levels of service.

b. Proposed measures to reduce or control direct impacts on public services, if any.

The construction of infrastructure improvements including a looped water system, sewer main system, and new roadways will address immediate public service needs. Additionally, the project will pay appropriate traffic impact fees, connection fees, capital facility charges, etc. No other measures are proposed, but the economic impact of the project is predicated to generate tax and other revenues (one-time and recurring) that benefit the City and other local service providers.

The preliminary economic impact analysis conducted by Toyer Strategic Advisors, Inc. indicates that the project would contribute one-time and on-going revenues to the City of DuPont and other local taxing districts. This includes a projected one-time contribution of approximately \$6 million dollars in construction sales taxes to the benefit of the State, City, Regional Transit Authority, Juvenile Detention, etc. The analysis also estimates that the project will create an additional \$1 million in new property taxes per year, which benefits local schools, the transit authority, the Port, the County, the City EMS and the Library. Such revenues should more than off-set any impacts to public services.

16. Utilities

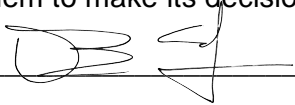
- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

| | |
|-----------------|-------------------------|
| Electricity: | Puget Sound Energy |
| Natural Gas: | Puget Sound Energy |
| Water: | City of DuPont |
| Sanitary Sewer: | Pierce County Utilities |
| Refuse: | LeMay |
| Telephone: | CenturyLink |
| Cable: | Comcast |

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:  _____

Print your name: Ben Eldridge, P.E.

Date Submitted: July 13, 2021, Revised August 17, 2022

(Issued 4/6/01)