

City of DuPont
1700 Civic Drive
DuPont, WA 98327



Phone: (253) 264-8121
www.dupontwa.gov

April 4, 2022

Scoping Determination and Summary of the Scoping Process for the Founder's Ridge Development Environmental Impact Statement

1. Introduction & Background Information

The purpose of this document is to summarize the Scoping process and establish the scope of the Environmental Impact Statement (EIS) for the Founder's Ridge development pursuant to the State Environmental Policy Act (SEPA), Revised Code of Washington (RCW) 43.21C. and the SEPA Rules in Washington Administrative Code (WAC) Chapter 97-11.

These provisions call for determining the range of proposed actions, alternatives, impacts, and mitigation measures to be discussed in an EIS pursuant to WAC 197-11-408. Because an EIS is required to analyze only probable significant adverse environmental impacts, scoping is intended to identify and narrow the EIS to the significant issues. The required scoping process provides for agency and public notice of the Determination of Significance (DS) and the opportunity to comment. The lead agency has the option of expanding the scoping process pursuant to WAC 197-11-410 and has done so for this proposal. If substantial changes are made in the proposal, or if significant new circumstances or information arise that bear on the proposal and its significant impacts, the scope of the EIS will be revised.

This document also provides background information on the current proposal, agency and public comments received, and the City's land use review process.

Attachment A is a table matrix that indicates the Elements of the Environment addressed by each commenter.

Additional information, including published and mailed public notices, a complete mailing list, and the originals of all the comments received are available for review at the City of DuPont Department of Community Development.

Project Description

Northpoint Development filed a permit application for approval of four buildings totaling 800,000 square feet on an undeveloped 91-acre site in the City of DuPont Old Fort Lake Subarea. Each proposed building is 200,000 square feet in size with dimensions of 235 feet by 830 feet and is 45 feet high with a single floor. Each building is proposed to have four entrances and 32 loading docks. Impervious area is proposed to be 40 acres, 18 acres of buildings and 22 acres of paved areas. Pervious area is proposed to be 51 acres. Building 1 is proposed to be about 800 feet west of the existing Center Drive and be about 350 feet from the closest adjacent development to the south. Building 2 is proposed to be 60 feet from the adjacent golf course. Building 3 is proposed to be 160 feet from the golf course. Building 4 is proposed to be 200 feet from the golf course fairway 1 to the west, 200 feet from the golf course fairway 9 to the south, and 140 feet from golf course fairway 6 to the north.

The buildings are proposed to be accessed by a public road system to be built through the site which will serve other portions of the Old Fort Lake Subarea when developed in the future. Recreational trails designated in the subarea plan will also be constructed on the project site.

The proposed buildings are proposed to accommodate allowed uses in the Old Fort Lake Subarea which includes Office, Light Manufacturing, Research and Development and Service Businesses. The applicant states that the buildings are easily dividable into spaces as small as 25,000 square feet and will provide for a variety of allowed uses.

Determination of Significance (DS)

The City of DuPont is the lead agency for SEPA review for private projects within the city pursuant to WAC 197-11-922-948 and DuPont Municipal Code (DMC) 23.01.070 and is responsible for performing duties required for environmental review of the Founders Ridge Development. Barbara Kincaid, the City Director of Public Services, is the Responsible Official for conducting SEPA review.

Based on review of application materials submitted on October 10, 2021, and further supplemented and determined to be complete on January 17, 2022, the City of DuPont, as lead agency, determined that this project is likely to have significant adverse impacts on the environment, and that an EIS should be prepared, consistent with RCW 43.21C.030 (2)(c), WAC 197-11-360, and DMC 23.01.070. The EIS will address reasonable alternatives and probable significant adverse environmental impacts of the proposed Founders Ridge Development

Public Notice

The City of DuPont issued a Determination of Significance (DS) pursuant to WAC 197-11-360 and initiated the EIS scoping process pursuant to WAC 197-11-408. These actions included the following:

- A combined Notice of Application (NOA), Determination of Significance, and Notice of Environmental Impact Statement Scoping (NOA/DS/Scoping) was issued January 22, 2022, with a 30-day extended scoping period, ending on February 22, 2022;
- The NOA/DS/Scoping was mailed to federal, state, regional and local agencies, and tribes; and to property owners within 300 feet of the site (measured from the boundaries of the property);
- The DS/Request for Comments was published in the WA State Department of Ecology's SEPA Register;
- The NOA/DS/Scoping was posted on the City of DuPont's website;
- The NOA/DS/Scoping was published in the *Tacoma News Tribune* on January 22, 2022;
- A posted notice was provided at locations around the site and a public information handout was provided at locations around DuPont, including the libraries, post offices, etc.
- The NOA/DS/Scoping provided notice of a public open house meeting that was held on February 10, 2022 to provide an opportunity to become more familiar with the proposal and to comment on the scope of the EIS; and
- An agency information virtual meeting was held by electronic communication on February 8, 2022.

The EIS Scoping notification actions meet or exceed all applicable noticing requirements of WAC 197-11-510 and the DuPont Municipal Code (DMC) 23.01.120.

Preliminary Identification of Alternatives

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

- **Alternative 1 – No Action Alternative.** Assumes the proposal is not developed. This may include other allowed development on the site.
- **Alternative 2 – Implementation of the proposal.** A combination of feasible mitigating measures taken together may also constitute an alternative.

Preliminary Identification of Elements of the Environment

The NOA/DS/Request for Comments *preliminarily* identified the following elements of the environment defined in WAC 197-1-444 for analysis in the EIS:

- Earth
- Air Quality
- Surface Water and Groundwater
- Plants and Animals
- Hazardous Materials
- Noise
- Land and Shoreline Use
- Aesthetics
- Cultural Resources
- Transportation
- Public Services and Utilities
- Economy, Social Factors, Social Policy

EIS Scoping Comment Opportunities

The EIS Scoping process provided notice to agencies, tribes, and the public that an EIS will be prepared for a proposal that is likely to cause probable significant impacts to the environment. The intent of scoping is to identify issues and concerns raised by the public, agencies, and tribes regarding the environmental issues and alternatives that should be addressed in detail in the EIS.

The Founders Ridge Development scoping process provided opportunities for agencies, tribes, and interested members of the public to submit written comments via mail or email, or on comment forms provided at a public open house.

A public scoping open house was held on February 10, 2021, from 6:00 to 8:00 at the City of DuPont City Hall Council Chambers. A total of 46 attendees signed-in to the open house. The number of attendees may have been somewhat greater because not everyone elected to sign in. The open house was set up with information stations with information on boards presenting information on the project and outlining the SEPA environmental review process and the city permit review process. Representatives of the applicant were available to explain the proposal. City Department of Community Development staff and the EIS consultant team and the city's permit review consultant were available to explain the environmental review and permit review processes. Forms for written comments were provided as well as information on submitting comments by mail, in person, or by email.

2. Scoping Comments Received

This section provides an overview and summary of comments received during the EIS scoping process. More specific information about the types of issues raised by element of the environment and the text of comments received is contained in Appendices A and B.

During the EIS scoping period, a total of 82 comments were received largely by email with a few letters, and written comments submitted at the public open house. Multiple comments on multiple dates were received from some commenters. Most comments were submitted by individuals. Comments were received from one public agency, the Washington State Department of Ecology.

The full text of all comments are available for review at City of DuPont Department of Community Development.

Comments on the SEPA Process

Several commenters had questions about the environmental review process including:

- The qualifications and independence of the consultant team preparing the EIS,
- The purpose and procedures for EIS Scoping, including how to provide comments and how comments would be reviewed, and
- Opportunities to review, comment on and challenge the conclusions of EIS analysis.

Comments on Alternatives

Several commenters requested that the EIS consider new alternatives. These comments included the following general categories:

- The proposal is clearly for warehouses which are not an allowed use. Alternatives that meet the zoning and Fort Lake Subarea requirements should be considered.
- Change the size and configuration of the buildings to be in character with the community.

Comments on Elements of 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 comments about a particular element of the environment. Additional details about the comment themes are provided in Appendix A and the text of all comments are provided in Appendix B.

Comments by SEPA Element of the Environment	Number of comments
Earth	1
Air Quality	12
Greenhouse Gas and Climate Change	3
Surface Water	4
Groundwater	3
Plants & Animals	47
Energy	2
Noise	57
Hazardous Materials	7
Land Use/Relationship to Plans and Policies	125
Housing	11

Comments by SEPA Element of the Environment	Number of comments
Light and Glare	11
Aesthetics	14
Cultural Resources	8
Transportation	105
Transportation, Hazards	38
Public Services – Police, Fire	3
Public Services - Schools	32
Public Services – Parks and Recreation	22
Utilities – Other	8
Economy	13
Cultural Factors – City Identity	44
Social Characteristics	7

Overview

Comments relating to the project's impacts on Elements of the Environment as defined in WAC 197-11-444 included:

Earth: Comments mentioned the consumption of land.

Air Quality: Comments mentioned emissions from truck traffic, both on-site and on adjacent roadways.

Climate: Comments mentioned additional heat from parking lots as a contributor to climate change and suggested electric trucks and alternative power on roofs as mitigation measures.

Surface Water: Comments cited contaminants carried into streams and Puget Sound from clearing and grading and long-term use.

Groundwater: Comments addressed contamination from hazardous materials and potential impacts on water supplies.

Plants and animals: Comments addressed habitat on site and in adjacent areas such as Sequaltchew Creek and the Nisqually National Wildlife Refuge.

Energy: Comments addressed use of energy by the proposal.

Noise: Comments addressed noise from vehicles on and off -site including noise from startup and idling, air brakes, backup beepers, loading activities, and other sources. The effect of 24-hour operation was cited. Noise impacts on nearby residential areas was a focus of concern. It was

stated that noise would deprive neighboring areas of peace and quiet. The effects of noise on military families associated with Post Traumatic Disorder and/or Traumatic Brain Injuries was cited. Noise was cited as a disruption to sleep, an increased risks to humans for obesity, depression, diabetes, and breast cancer; and as an adverse impacts to bird nesting and rearing. Noise impacts on the adjacent Middle School identified effects on student learning and use of athletic fields. Noise buffering from buildings and landscaping was addressed.

Hazardous Materials: Comments addressed various potential impacts to human health and the environment from soil contamination caused by airborne deposition of arsenic and lead from the Tacoma Smelter Plume (TSP) and on-site munitions manufacturing. The State Department of Ecology cited the need to adhere to past consent decrees and TSP Model Remedies Guidance. Recommendations included sampling to address data gaps, remediation and confirmation of compliance with requirements. Site design recommendations included isolation or removal of contaminated soils from public spaces, yards and children's play areas.

Land Use – Relationship to Existing Land Use Plans: Comments questioned whether the proposal was for a prohibited warehouse use, rather than the allowed light-industrial use; discussion was provided of the limits to warehousing as an accessory use. Several persons pointed out that technical reports submitted with the application described the proposed use as warehousing. Building characteristic alleged to be indicative of warehouse use were described. Warehouse use was alleged to have greater traffic, noise, and other impacts on adjacent uses.

Land Use – Housing: Comments claimed that depreciation of house values would occur because of the proposal.

Land Use – Light and Glare: Light and glare impacts from parking lot and building lighting and truck traffic were cited as a change in the character of the nearby uses.

Land Use – Aesthetics: Comments asserted that the proposal is not consistent with the character of the community, is an eye-sore, that building size is out of character and will be an adverse effect on adjacent residences and the school to the south, will alter the natural beauty of the area and will be an unharmonious backdrop to the existing golf course.

Land Use – Historic and cultural preservation: Comments asserted that the project will adversely affect Native American burials, the historic 1833 Hudson Bay Company Fort site, a potential future Nisqually tribe cultural center, and the cultural significance of the Nisqually Prairie.

Transportation: Adverse impacts cited included additional traffic and truck traffic on local streets, adverse impacts on I-5 interchanges, increased periods of extreme congestion on DuPont-Steilacoom Road, increased vehicle/train conflicts at the grade level crossing, increased misrouting of trucks into residential neighborhoods, and increased road deterioration and maintenance costs from heavy vehicles. The lack of public transit was cited as a limiting factor for commuting options for workers that would lead to increased traffic.

Transportation, Hazards: Comments asserted that a variety of hazards will take place in the local community including increased hazards to students accessing Pioneer Middle School, athletic fields and trail due to the project location and the location of the main access point close to these facilities, general traffic hazards will increase due to increased traffic volumes, impacts to school busses, and vehicle/bicycle conflicts. Traffic hazards on I-5 were identified from backed up vehicles, particularly as they try to make access to JBLM.

Public services – Fire and Police: Comments requested that analysis include the need for additional fire and police equipment and personnel.

Public services, Schools: Comments pointed out many impacts on the Pioneer Middle School, largely reflecting comments cited above on noise, air quality, and transportation hazards.

Public services, Parks and recreation: Comments asserted adverse effects on access to athletic fields adjacent to the project, on the trail along the south side of the proposal, degradation of the recreational experience on the city trail system due to additional traffic and noise, adverse impacts to the Sequalitchew Creek trail to the north, as well as degradation of the recreational value of the golf course due to incompatible adjacent development.

Public services, Maintenance: Comments assert that city infrastructure will be degraded, especially street damage by heavy trucks.

Utilities: Comments addressed the demand for a variety of utilities and the character and location of new infrastructure for electricity, water, gas, sewer and storm water.

Economic and Fiscal Conditions: (Additional element to be covered in an EIS. (Pursuant to WAC 173-806-125) as provided in DMC 23.01.110): Comments questioned whether the proposal would have a positive or negative impact on the city's tax base and revenues when compared with expenses. The effects on the desirability of the golf course for future large golf events and for golf-related tourism was questions along with the related reduction in demand for lodging and other uses and consequent economic returns to the public and revenue to the city. The potential wage rates of future employees and whether they likely will reside in the city was questioned.

Cultural Factors: (Additional element to be covered in an EIS pursuant to WAC 173-806-125 as provided in DMC 23.01.110): Comments questioned whether the project would be in harmony with the culture of the city, its small-town neighborhood feel, and whether it would contribute to achieving a balance between natural features, housing and commerce.

Social Policy Analysis: (Additional element to be covered in an EIS pursuant to WAC 173-806-125) as provided in DMC 23.01.110): Comments asserted that environmental and social impacts of the project would not be consistent with the quality of life currently enjoyed by citizens of DuPont.

Comments Outside the EIS Scope: Support for or Opposition to the Proposal: Many comments expressed support or opposition to the proposed project. Such comments do not address the

appropriate scope of the EIS in terms of reasonable alternatives, the elements of the environment for which the proposal is likely to result in probable significant adverse impacts, and mitigation measures pursuant to WAC 197-11-408. Such comments may be considered by decision-makers during the review process for the proposal in addition to environmental concerns and need not be included in the EIS.

3. Environmental Impact Statement (EIS) Scoping Determination

This section contains the lead agency's conclusions regarding the appropriate scope of the Environmental Impact Statement (EIS). The conclusions are based on consideration of public, agency, and tribal comments submitted during the scoping process, and the requirements of SEPA as provided in the State Environmental Policy Act (SEPA) RCW 43.21C and the SEPA Rules in the Washington Administrative Code (WAC) 97-11.

Scoping Process

As outlined in detail in Section 1, the City of DuPont used "reasonable methods" to inform the public and other agencies that an EIS is being prepared and integrated notice with existing city notice procedures for permit review in accordance with WAC 197-11-408(2)(ii) including integration of the Determination of Significance (DS) and EIS Scoping Notice with Notice of Application as provided in DuPont Municipal Code (DMC) 23.01.120(c). Noticing met all procedural and substantive requirements of WAC 197-11-510 Public notice.

The city is committed to making the environmental review process useful to decision makers; emphasizing important environmental impacts and alternatives; preparing environmental documents that are concise, clear, and to the point; integrating the requirements of SEPA with existing agency permit review procedures and practices; encourage public involvement in decisions that significantly affect environmental quality; and identifying, evaluating, and implementing reasonable alternatives that would mitigate adverse effects of proposed actions on the environment as provided in RCW 43.21.C. WAC 197-11-030, and DMC 23.01.150.

EIS Alternatives

The City has determined that the two EIS alternatives *preliminarily* identified in the Scoping Notice for study in the EIS represent a reasonable number and range of alternatives for analysis in the EIS, as defined by the SEPA rules pursuant to WAC 197-11-440(5) and 786.

Alternative 1 – No Action Alternative: This alternative is defined as what would most likely happen if the proposal does not move forward. The "no action" alternative does not mean that no development would occur on the site. The No Action Alternative that will be studied in this EIS will include discussion of alternative possible future development of the site in accordance with the existing Comprehensive Plan and Old Fort Lake Subarea Plan and existing land use code regulations. These alternative development scenarios may involve different uses, site

configurations and building size, bulk, height, and other characteristics that respond to specific policies and regulations in adopted plans and regulations and result in reduced impacts.

Alternative 2 – Proposed Development: The EIS will analyze the proposed Founder's Ridge development as contained in the proposal application materials. In addition, in the course of EIS analysis, mitigating measures will be identified that may reduce environmental impacts. If a series of feasible mitigating measures taken together would constitute an alternative course of action that could feasibly attain or approximate the proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation, such an alternative may be evaluated in the course of EIS preparation. Such potential alternatives will be evaluated in terms of whether they are reasonable alternatives pursuant to WAC 197-11-030, 060, 400, 402, 408, 440, 448, 665, 786, 792, as well as RCW 43.21C.030, -031, -110 and DMC 23.01.

Elements of the Environment

The greatest number of comments received during the EIS scoping period expressed concerns regarding Land Use/Relationship to Plans and Policies; Transportation, including hazards; Noise, Air Quality, Plants and Animals, Parks and Recreation, Economy and Cultural Factors/City Identify. Most of the concerns fall within elements of the environment which were identified in the scoping notice for detailed study in the EIS.

Elements of the Environment to be analyzed in the EIS are listed below, together with the general analysis approach.

Technical studies provided by the applicant will be independently reviewed for accuracy and relevancy and utilized and supplemented to the extent needed for a complete and independent analysis of impacts.

Earth: A variety of impacts on geology, topography, soils, and other physical features will be assessed by geotechnical specialists. Areas of landfill as the result of the dynamite works which have structural or other limitations will be addressed. Critical Areas such as landslide hazards and erosion hazards will be assessed in reference to compliance with codes and any additional hazards and impacts. If it is determined that there are hazardous materials "hot spots" on site, their potential for use as fill will be assessed.

Air: Air quality will not be assessed in this EIS. Mobile sources from automobiles generally are not an issue, because the area is compliant with standards. Pierce County is no longer a non-attainment area or maintenance area for mobile pollutants from cars and trucks. Portions of Pierce County do not meet air quality standards for small particulates with most emissions from residential wood smoke; however, this area is outside of the designated area of non-compliance. Emissions during construction, including fugitive dust are addressed by regulatory provisions administered by the Puget Sound Clean Air Agency. For these reasons, there is no probable significant adverse impact on air quality. Potential air emissions from light industrial uses will be assessed under the Land Use element.

Climate/Greenhouse Gasses: Climate change and greenhouse gas emissions that are generated on or near the facility site during the construction, operation, and decommissioning of the project will be assessed in general accordance with the Washington Department of Ecology Greenhouse Gas Assessment for Projects (GAP) Rule Washington Administrative Code (WAC) 173-44. Relevant State, Regional, and Local Policies will include state legislation, state executive orders, policies adopted by the Puget Sound Regional Council, the Pierce County Climate Change Resilience Strategy, and City of Dupont Comprehensive Plan policies.

Surface Water: There are no surface water resources on the site. Old Fort Lake which is to the west of the site is fed by groundwater and no surface water from the site is discharged into the lake. The project proposes to utilize infiltration to groundwater for all runoff from impervious surfaces. The proposed stormwater management system will be reviewed by the city for compliance with the Stormwater Manual for Western Washington. There is not likely to be runoff from non-pervious portions of the site because Steilacoom Gravels are extremely porous and such runoff will rapidly infiltrate into the ground. If hazardous materials "hot spots" are identified in areas designated for stormwater management analysis in the Hazardous Materials and Groundwater elements will address whether stormwater conveyance and infiltration system construction and operation could encounter such "hot spots" and transport hazardous materials. For these reasons, there is no probable significant adverse impact on surface water.

Groundwater: Existing groundwater conditions will be described based on existing sources including the applicant's geotechnical report, and other area studies and assessment. The potential for groundwater to be present at a depth that may mobilize hazardous materials as the result of stormwater infiltration will be qualitatively assessed based on existing well logs and other information. If the potential exists for hazardous materials to mobilize as the result of stormwater infiltration, potential impacts will be qualitatively assessed if such is adequate, or additional tasks will be proposed for groundwater modeling.

Plants and animals: Terrestrial habitat evaluation will assess impacts on relevant affected ecological systems and species. Impacts will include direct project impacts as well as indirect and cumulative impacts. Potential impacts to wetland buffers adjacent to Old Fort Lake will be evaluated.

Energy and natural resources: This will be assessed in conjunction with greenhouse gas emissions for combustion related energy use. Electric energy and natural gas will be assessed in the utility section.

Noise: Existing sound levels will be measured to provide characterization of existing conditions, including truck noise. Construction noise and operational noise will be assessed using information on standard equipment and process noise. Transportation noise assessment will address peak and average noise levels and frequency and will characterize impacts on sensitive receptors including people living nearby, schools and similar sensitive uses. Noise impacts on open spaces characterized by a tranquil and natural setting will be evaluated. A range of mitigation measures can be considered including site design, operational restrictions, barriers, and other features.

Toxic or hazardous materials: Commercial explosives manufacture on the site resulted in widespread toxics contamination. In 1987, a Phase II Site Characterization study documented the extent of contamination and led to a 1991 Consent Decree (No. 91 2 01703 1) and an additional decree (No. 03 2 10484 7), which was issued in 2003. As recommended by the Department of Ecology, post-cleanup surveys will be assessed for adequacy and supplemented as necessary. In addition, the Tacoma Smelter Plume deposited arsenic and lead pollutants over a large area, including this site. The requirements for remediation of hazardous materials from that source will be assessed. Impact assessment will be based on documented levels of contamination and potential exposure to users or occupants in specific areas, together with risks of health impacts in terms of adopted standards and current research. Analysis will be coordinated with the earth, and groundwater elements.

Land and shoreline use: This element will be assessed in the context of the DuPont Comprehensive Plan and Old Fort Lake Subarea Plan. This section may be combined with Aesthetics/Visual Resources to the extent that land use, urban design and other issues can best be integrated. The relationship to open spaces, critical areas and park and recreation facilities also will be considered to the extent that they shape community character. The focus of this analysis will be to provide an integrated overview of how the development affects the community characteristics that residents desire and expect, rather than to duplicate analysis for land use code compliance.

Aesthetics / Light and glare: The analysis will include a description of the existing aesthetic character of the site and surroundings and the proposed aesthetic character as defined by the City Comprehensive Plan and Old Fort Lake Subarea Plan. Impacts assessment will include visual simulations/building renderings from representative public viewpoints and will evaluate how perceptions of the project affect open space, vegetation, residential and other use areas, and the extent to which components of the resulting landscape are integrated with and are consistent with City plans and goals regarding community character.

Housing: The potential for impacts on housing will be integrated with land and shoreline use and the relevant results of noise, transportation, and recreation analysis.

Recreation: Impacts on existing developed, undeveloped, and potential parks, recreation facilities, trails, and open space areas, including the golf course, will be assessed. Proximity impacts that may degrade the character of existing areas may include light, glare and noise as well as development features incompatible with the character of an area, such as out of scale buildings adjacent to natural or activity areas. Opportunities for passive enjoyment and recreation trails will be integrated with the assessment.

Historic and Cultural Preservation: The potential for the presence and disturbance of cultural resources from indigenous pre-European contact and historic resources after European contact will be assessed including the potential undisturbed natural areas where additional resources may be present. An area that lies within the Old Fort Lake Subarea is subject to a multi-party memorandum of agreement supporting listing of the area after final development approvals and the project

potential impacts on those resources will be assessed. Assessment of impacts will include potential for disturbance or destruction, and compatibility of adjacent development with the character of historic areas. Some designated cultural resources, such as cemeteries were designated based on limited archaeological field work in the early 2000s and may require additional effort to assure that unidentified cultural resources are not present outside the previously defined boundaries.

Transportation: Vehicular traffic impacts will be assessed to meet both city concurrency standards and the broader Comprehensive Plan policies for developing an effective integrated transportation system. Project trip generation may be based on ITE survey information; however, because the emergence of a more home-based work and shopping environment, supplemental information may be gathered from comparable facilities in DuPont or the region. Additional scenarios of uses allowed by the land use regulations may be prepared. Traffic distribution will be based on regional models and corrected for local variations.

Operational impacts of the project and cumulative impacts with other projects in the development queue will be assessed. Cumulative impact analysis may include buildout of the Fort Lake Subarea. Non-motorized transportation will be characterized and analyzed both from the perspective of demand and capacity, as well as the potential to affect mode choice. Traffic hazards will assess vehicular, non-motorized, and pedestrian risks based on both configuration hazards and capacity and will include students accessing the nearby middle school. Impacts of increased city street maintenance needs, particularly as relates to heavy truck traffic will be assessed.

Public Services:

Police and Fire will be assessed based on adopted Level of Service standards and existing operational patterns. Impacts will include both capital and operational demand. Fiscal impacts will be assessed based on existing and projected cost patterns.

Schools: Analysis of impacts on school capacity will not be included in the EIS because such impacts are primarily created by residential housing units that house potential students and because local jurisdictions have adopted school impact fees to mitigate demand. Impact analysis will be included in the noise element which will address the school as a sensitive receptor and in the transportation and transportation hazards analysis. Impacts on school playfields will be assessed in the park and recreation element.

Utilities:

Water system impacts will not be assessed because the Dupont Water System Plans addresses water demands of the buildout of the city under existing zoning, including the Old Fort Lake Subarea. The plan provides for adequate system capacity water supply, water rights, storage and fire flow and programs for construction of future system needs together with a utility rate structure to finance needed improvements. For these reasons there is not a probable significant adverse impact on water supply.

Sewer system impacts will not be assessed because Pierce County Utilities plans including the Chambers Creek Sewage Treatment Facility and sewage interceptors serving DuPont provide for adequate existing and planned future treatment capacity and transmission capacity to serve the proposal. The county's requirements for assessing new service needs includes analysis of future sizing needs based on the service area buildout capacity. For these reasons there is not a probable significant adverse impact on the sewer system.

Communication and electric utilities will not be assessed for future system upgrade needs. The potential need to expand electrical substations or locate new ones have been programmed by the affected service providers. Similarly, communication infrastructure needs, and facilities have been planned for by multiple providers to serve the larger regional demand as well as local demand. For these reasons there is not a probable significant adverse impact on communication and electric utilities.

Additional elements required by DMC 23.01.110.

Economy: This will be assessed in terms of Comprehensive Plan policies to support increased economic resiliency and readiness, develop employment in DuPont, and enhance local retail activity. The potential effects on the golf course as a generator of economic activity will include integration with park and recreation, land use, and aesthetic analysis. Analysis will include assessment of demand for allowed uses within the Old Fort Lake Subarea. This analysis may be integrated into the Land Use element.

Cultural factors and Social Policy Analysis: This will be a combined discussion and address policies identified in the Comprehensive Plan that address the city's community character and identity. The type, scale and character of development will be assessed in terms of how it fits into the City's intended scale, massing, materials, and vernacular architecture style. This will be integrated with a social policy analysis that considers effects on a people's way of life, how they live, work, play and interact with one another on a day-to-day basis as well as shared beliefs, customs, values, and how their community provides cohesion, stability, character, services, and facilities.

Non-Environmental Issues

An Environmental Impact Statement (EIS) is not required to review every concern that may be evaluated by decision-makers in making a final decision about a project and may include additional analyses that will assist in making decisions per WAC 197-11-448. An EIS is focused on *environmental* impacts. Decision makers are mandated to consider *environmental* impacts together with other relevant considerations such as the general welfare, social, economic, and other policy that are not necessarily included in the EIS.

Non-environmental issues raised in the scoping process will not be included in the EIS unless such issues will assist in making decisions on the project and relate to environmental issues (WAC 197-11-440(8), WAC 197-11-448(4), and 197-11-640).

Analysis Process

EIS analysis will follow the following general steps:

Technical Report Review: Technical Reports prepared by Northpoint consultants, will be independently reviewed by the city retained consultants to ensure that:

- Methodology meets the applicable professional standard of care and satisfies requirements for effective EIS analysis;
- Reports appropriately and accurately describe existing conditions and analyze potential impacts;
- Reports identify uncertainty and the extent to which such uncertainty may result in the potential for alternative conclusions.
- Technical Reports will be assessed to determine:
 - The extent to which they can be relied upon and used to describe existing conditions, impacts and mitigation;
 - The extent to which additional analysis will be required.

Affected Environment:

- This section will describe principal features of the environment that would be affected, or created, by the alternatives under consideration.
- Existing conditions will vary by the element of the natural and built environment.
- Description will be limited to the features most affected by the proposal environment and will focus on features necessary to understand the environmental consequences of the proposal and alternatives.

Impacts:

- This section will describe and discuss significant impacts that will narrow the range or degree of beneficial uses of the environment or pose long term risks to human health or the environment.
- Impacts assessed will include:
 - Direct impacts of a proposal on identifiable features of the natural and built environment
 - Indirect impacts that may be caused by a proposal, including those effects resulting from growth caused by a proposal, off-site facilities for which a demand is contributed to by the project, and the likelihood that the present proposal will serve as a precedent for future actions. In this case, precedent is important because this is the first development proposed in the Old Fort Lake Subarea.
 - Cumulative impacts are the incremental effects of the proposal when added to other past, present, and reasonably foreseeable future actions. Cumulative analysis includes any significant irreversible or irretrievable harm to long-term environmental productivity.
- Impacts include short-term and long-term effects that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer.

- Impacts that are “probable” will be the focus of assessment. Probable impacts are likely or reasonably likely to occur, as distinguished from impacts that merely have a possibility of occurring but are remote or speculative. Potential impacts identified in the public scoping process that are not considered probable may be briefly assessed to establish the criteria for not considering them probable.
- Impacts that are significant will be the focus of analysis. Significant means a reasonable likelihood of more than a moderate adverse impact on environmental quality and involves context that may vary with the physical and built environment setting and intensity that depends on the magnitude and duration of an impact. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.
- Impacts are not limited to those within the City of DuPont jurisdiction but include impacts on the ecosystem or human system affected, within reasonable bounds.
- The EIS will briefly mention nonsignificant impacts or mitigation measures to satisfy other environmental review laws or requirements.

Mitigation Measures

- This section will describe those mitigation measures that could be implemented, or might be required, to reduce impacts of the proposal.
- The mitigation sequence will include the following:
 - Avoidance means mitigating by selecting the least-damaging project type, spatial location and extent compatible with achieving the purpose of the project. Avoidance is achieved through an analysis of appropriate and practicable alternatives and a consideration of impact footprint.
 - Minimization means mitigating by managing the severity of a project's impact on resources at the selected site. Minimization is achieved through the incorporation of appropriate and practicable design and risk avoidance measures.
 - Compensatory Mitigation means mitigating an impact by replacing or providing substitute resources for impacts that remain after avoidance and minimization measures have been applied, and is achieved through appropriate and practicable restoration, establishment, enhancement, and/or preservation of resource functions and services.
- Mitigation measures generally would include, but are not limited to:
 - Any measures not specifically included in the proposal that agencies are committed to implement by specific adopted standards;
 - Specific measures including changes in project configuration or design that would avoid or minimize impacts;
 - Specific measures that could be added to the project that would add or change features, uses or change technology to avoid or minimize impacts.
- Evaluation of the feasibility or mitigation measures includes:
 - The intended environmental benefits of mitigation measures are for significant impacts;

- o The intended environmental benefits of mitigation measures are for non-significant impacts that may cumulatively be environmentally beneficial or better meet adopted policies;
- o The technical feasibility and economic practicability of mitigation measures;
- o If there is concern about whether a mitigation measure is capable of being accomplished, or there are questions of the effectiveness of the measure, discussion should include the source of uncertainty and any means of better ensuring effective implementation, including monitoring and adaptive management;
- o The detail of analysis of mitigation measures will be in proportion to the significance of impacts they address and the extent to which they substantially reduce said impacts.

Issuance

I, Barbara Kincaid, Director of Public Services and Responsible Official of the Lead Agency pursuant to DuPont Municipal Code (DMC) 23.01.140 hereby adopt this Scoping Determination pursuant to WAC 197-11-408. The EIS for this project shall be prepared as provided in this scoping determination, provided that the scope of the EIS shall be revised if substantial changes are made later in the proposal, or if significant new circumstances or information arise that bear on the proposal and its significant impacts.



September 6, 2022

Signature

Date

ATTACHMENT A

Commenter	Earth	Surface & Ground Water	Plants & Animals	Air Quality/ Climate	Noise	Hazardous Materials	Land Use/ Plans	Housing	Light & Glare	Aesthetics	Historic & Cultural	Parks & Recreation	Transportation	Public Services	Utilities	Economic	Cultural/ Social
Agencies																	
Ecology, Dept of	X		X	X		X									X		
Public																	
Ambrose, Carman			X	X			X			X		X	X				X
Ambrose, Nora	X		X	X	X		X		X			X	X				
Ambrose, Phil				X		X	X		X			X			X		X
Bags, Jim							X										
Barbara, Diana		X					X				X						X
Barnes, Chris					X		X						X				
Bennett, Mariam		X	X	X					X			X		X		X	X
Bivens, Larry and Jean			X	X			X						X				X
Boston, Michelle			X		X		X						X	X			X
Bright, Alyssa		X	X	X	X		X		X			X	X		X		X
Bright, Bryan		X	X		X	X	X		X	X		X	X	X	X		X
Bright, Leslie				X	X		X			X			X				X
Bright, Stuart				X	X		X						X	X			X
Brown, Mike					X		X	X				X	X				X
Bungert, David														X			X
Burch, Karen	X	X			X	X	X						X				X
Burlison, Lauren							X	X					X				X
Cajigal, Becky													X	X			X
Calahan, Amy					X								X	X		X	X
Carrillo, Ernie		X					X										X
Cayetano-Brandon, Michelle	X	X	X	X	X		X						X	X		X	X
Chapman, Rebecca						X							X	X			
Chase, Lee								X					X	X			X
Cody, Robert								X						X			
Colon, Sara			X					X	X	X			X	X	X		X
Cooper, Gareth								X						X			
Donahue, Kazuko								X						X			X
Doudt, Jason								X					X				
Downey, Dennis and Casandra								X					X				
Elliott, Beth					X		X										
Engstrom, Rick							X						X				X
Erickson, Julie							X	X	X				X				X
Erickson, Matt			X				X							X			X
Etzkorn, Anna Marie				X			X							X			X
Etzkorn, Leticia								X					X		X		
Fitzgerald, Karen					X								X	X			
Gallagher, Kari			X		X		X						X			X	X

Garcia, Sean and Loraine						X			X										
Gomez, Heather			X		X	X							X						
Gomez-Hongo, Megan						X							X	X			X	X	
Hallahan, Shell			X	X		X						X	X	X			X	X	
Harris, Ben													X					X	
Hartline, Christy			X			X							X				X	X	
Hess-Harvey, Kulleen						X		X	X			X						X	
Hillsberry, Joshua						X							X						
Humphrey, Adam and Lisa			X		X	X							X					X	
Hunt, Elizabeth			X		X	X				X	X		X	X				X	
Jones, Sally																		X	
Jones, Shawna			X		X		X						X	X					
Karpel, Jessica					X								X	X				X	
Keefe-Hardy, Virginia													X				X		
Keys, Vicki							X						X	X			X	X	
King, Bridget		X	X	X	X		X					X		X	X			X	
Kirkland, Leah				X					X										
Larkin, Dennis																		X	
Lippert, Jeff and Christa														X					
Lynch, Kate							X								X				
McDonald, Jennifer					X										X				
McManus, Edward and Mary			X						X					X			X	X	
Mills, Tim and Belle							X							X					
Mitchell, Cara			X		X		X		X	X	X	X	X	X			X	X	
Nelson, Scott															X				
Nolan, Karen			X				X			X				X					
Norris, Judy			X		X		X			X			X	X				X	
Novak, Heather			X				X							X				X	
Novak, Krista				X	X		X							X				X	
Okita, Lynn			X				X							X					
Oliver, Carol and Jim							X												
Orozco, Lizbeth							X										X	X	
Papier, Celeste			X		X									X	X			X	
Petty, Lisa					X										X			X	
Schenk, Steven			X		X				X					X					
Schneider, Kelly									X					X	X			X	
Shaw, Dave														X					
Shaw, Dave and Pam				X															
Shenkel, Willee			X		X									X					
Shoup, Christine					X		X												
Slattery, Mike			X											X	S			X	

Slattery, Nicole			X	X		X		X							X	X
Smith, Linda						X							X			X
Stephenson, Norm						X							X			
Stoker, Alex						X										
Unknown					X	X						X	X			
VanBeurden, Ben					X		X	X				X				
Velazquez, Marcella						X	X									
Walsh, Kate				X	X		X	X					X			X
Wegner, Harriet						X										
Westman, Roger				X			X	X				X				X