

From: [jaywa74](#)
To: [Janet Howald](#)
Subject: Dupont site
Date: Monday, October 14, 2024 12:24:34 PM

Please consider implementing rules such that any development that removes trees must plant new ones elsewhere to replace them - 1 for 1, or even better 2 or more for 1 - then there would be a net gain over time.

From: [Janet Howald](#)
To: [Janet Howald](#)
Subject: FW: DuPont West Industrial Warehouse
Date: Monday, October 14, 2024 2:57:29 PM

From: Kate Walsh <3mcwals@gmail.com>
Sent: Sunday, October 13, 2024 11:51 AM
To: Barbara Kincaid <bkincaid@dupontwa.gov>
Subject: DuPont West Industrial Warehouse

Director Kincaid,

The developer proposes to build a 256,800 square foot warehouse on 19.65 acres of vacant land next to Sequalitchew Creek Trail in DuPont. The proposed warehouse will be built on the west side of Sesqualitchew Drive, near 1700 Center Drive. A noise study found that the proposed affected area currently primarily Contains birdsong, human traffic, ie people walking and talking, wind in the trees, and the sound of water in Sesqualitchew Creek.

The developer will introduce commercial level noise and other pollution, including from grading, paving, significant car and truck traffic, truck parking, roadway expansions and improvements, and water and sewer extensions.

The developers project will require the destruction and removal of hundreds of trees, and the relocation and reconstruction of Sequalitchew Creek Trail. The forestry consultant's report deemed most of the trees subject to removal to be in good or fair condition, and the expert identified several landmark trees that typically require protection due to their rareness, size, age, and structure or condition that the current warehouse plan would destroy. And the developer's plan would destroy necessary habitat for a state-recognized endangered species, the Western Gray Squirrel.

The developer's warehouse plan also conflicts with the City of DuPont zoning regulations and its Comprehensive Land Use Plan. The plan to place its warehouse adjacent to Sequalitchew Drive and the Sesqualitchew Creek Trail is not consistent with City zoning and land use statutes and comprehensive plan provisions.

The plan conflicts with the 2015 DuPont Comprehensive Plan as amended in 2021, and DuPont Municipal Code 24.40.020. Provisions of the city's Comprehensive Plan emphasize the vision is of a small city, in a carefully planned setting, that preserves the natural beauty of wilderness and sea. The comprehensive plan vision statement

emphasizes the importance of maintaining the City's small town aesthetic and “your hometown” feel.

Toward the goal of maintaining small town aesthetic and uses, DMC 25.40.020 limits developer uses that may be made adjacent to main streets, like Sequelitchew Drive, allowing only uses permitted in the Business and Technology Park. DMC 25.40.020 further provides that freestanding warehouse and distribution facilities are not allowed in the Business and Technology Park District, while Comprehensive Plan LU-9.4 limits warehouse uses to industrial areas and DMC 25.45.030 (17) forbids warehouse abutting main roads.

Consistent with this framework, the developer's planned warehouse, which fronts onto Sequelitchew Drive, has to comply with the DMC and the comprehensive comprehensive plan. And the municipal code and Comprehensive Plan LU provisions must be given their ordinary, every day meaning, and not be narrowly read or distorted to defeat the ends of the relevant provision.

Allowing the developer to build its warehouse effectively abutting Sesqualitchew Drive, will destroy extensive swaths of trees that promote environmental and residential health. It will destroy, not promote, the small town, carefully planned aesthetic and the value of homes in DuPont, as envisioned in the comprehensive plan. And the developer does not address how it will remedy its destruction of the endangered species habitat.

Rather than violate the Comprehensive Plan and DMC provisions, as the developers current plan does, the city should require compliance with the Comprehensive Plan as amended and the DMC, by reducing the development foot print and pursuing light manufacturing not the proposed industrial warehouse.

Thank you

Kate Walsh

Palisade Park

DuPont WA

From: [Anneliese Simons](#)
To: [Janet Howald](#)
Subject: New warehouse DuPont 243
Date: Sunday, October 13, 2024 10:20:05 AM

Hello,

Yesterday, I had a lovely walk down to the sound on the Sequelitchew Creek Trail. I implore you and the city council to halt further development of warehouses and other such large scale developments that would alter and pave over our precious wild areas.

The green spaces in Pierce County are shrinking as the demand for these mega warehouses take over our land. Where are all of the wild life expected to go? Our roads are already congested with enough truck traffic and associated congestion.

Please protect the beauty of this area and halt the development of project Dupont 243.

Sincerely,
Anneliese Simons
Pierce County resident
253 232 8880

From: [Heather Carawan](#)
To: [Janet Howald](#)
Subject: Public Comment against proposed warehouse on Sequallitchew Drive
Date: Sunday, October 13, 2024 11:03:28 AM

As a resident of the South Sound, and as someone interested in protecting tree cover in our area, I have concerns about the proposed warehouse on Sequallitchew Drive.

An excerpt from an article in the Tacoma News Tribune highlights some of my concerns.

"According to a forestry consultant report dated March 20, most of the 669 deciduous and conifer trees surveyed on the property were described to be in "fair" or "good" condition, and 75 landmark trees were identified. Landmark trees typically require protection due to their rareness, size, age, structure or ecological condition. According to the report, 56 landmark trees would need to be removed in addition to 396 healthy trees if the warehouse complex is built as planned. Read more at:

<https://www.thenewstribune.com/news/local/article293660284.html#storylink=cpy> "

Thank you for considering this perspective.

Sincerely,

Heather Carawan

Get [Outlook for Android](#)

From: [Heidi Abarro](#)
To: [Janet Howald](#)
Subject: Sequalitchew Trail
Date: Sunday, October 13, 2024 9:35:02 PM

Hello,

I read an article about 450 trees proposed to be taken down to make room for a warehouse. We walked this trail with our 5 year old for the first time on Saturday and highly object to this proposal. Easy hikes like this are a godsend for families like us who love to hike and walk but have a young child who no longer fits a stroller or hiking carrier. It was moderately busy with lots of hikers with dogs and families. I have read a lot of reviews on Alltrails.com and it seems to be a very popular hike. We would love to do this hike in all the other seasons. There needs to be a balance between preserving the natural beauty of our trail system and building more warehouses for the sake of capitalistic gain. DuPont doesn't need another warehouse! I've studied maps of all family friendly hikes in the south sound and DuPont is one of the few between Olympia and Tacoma. Please keep the trail as is.

Thank you,
Heidi Greene

Sent from my iPhone

From: [Hunter Henderson](#)
To: [Janet Howald](#)
Subject: Warehouse
Date: Saturday, October 12, 2024 12:08:53 PM

Hello Janet,

It has come to my attention that your city is getting ready to make a huge mistake as many others have done.

Aside from added pollution, degrading environment, and increased health problems these warehouse jobs are not prime jobs for your community.

Consider attracting other businesses that will benefit the citizens of DuPont like a vocational training facility.

There are so many other opportunities for revenue than a warehouse.

Cheers,

Hunter D. Henderson, MPA

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-Aldo Leopold

From: [Esther Day](#)
To: [Janet Howald](#)
Subject: Warehouse in Dupont - DO YOUR HOMEWORK - CHECK OUT HOW MANY EMPTY WAREHOUSES ARE TAKING UP PRECIOUS LAND
Date: Sunday, October 13, 2024 6:09:42 PM

Dear Ms. Howald ,

First, please before you approve this warehouse - please do your homework. More and more warehouses are being left vacant throughout our country – and Washington State is not unscathed.

Please take time to read this story and why we need to protect our trees:

<https://interestingengineering.com/science/jadav-payeng-the-man-who-planted-an-entire-forest-by-himself>

This story shocked me to the core.

A proposal to build a 256,800-square-foot office/warehouse building on about 20 acres of vacant land near the Sequelitchew Creek Trail in DuPont will be before the city's hearing examiner next week. The building would be built on the west side of Sequelitchew Drive, near 1700 Center Drive, and if approved would result in the removal of more than 450 trees and the relocation and reconstruction of the existing Sequelitchew Creek Trail, according to a public hearing notice.

Read more at:

<https://www.thenewstribune.com/news/local/article293660284.html#storylink=cpy>

I beg you to do your homework and privately check sources. What I have found in calling California and speaking to warehouse workers here in our local area – is that these warehouses DON'T HIRE TOO MANY HUMAN BEINGS – THEY USE ROBOTS to handle the items and very few people. That is what is happening throughout our Country.

I spoke to some Amazon warehousemen who work at different warehouses for Amazon AND they told me that they are using robots and very few people to make sure that the right stuff is loaded on the trucks.

You will generate more CO2 and the impact to the people of DuPont will be beyond what you can imagine. The worst part is that they take up so much space and the trucks that go through the warehouse are massive polluters and cutting down trees that clean the air is so destructive to the eco system of your creek and city and the health of your citizens and tax payers.

Please be sure to get a health impact statement and DO THE SCIENCE. But just as important, DON'T LET THEM CUT THOSE TREES.

Just do the search at how many warehouses are vacant and sitting there growing grass around them and that land is not usable now. Why? Because the property owners have a warehouse and won't take it down.

Don't let your voters down. Stop the warehouse and PLEASE DO NOT CUT TREES DOWN.

I have trees on my property and when I cut some branches to make a centerpiece for my boss using Christmas tree branches that I took to work. When I got there, I went into the small kitchen and saw that the tops of the branches – every single bit of the tree green was black and I could not wash it.

This was just from the air planes going overhead from JBLM and no one really knows what is happening. Yet people get sick and die.

Don't let your citizens suffer for a warehouse that may not be open for long.

LIVES MATTER – OUR WILDLIFE SUPPORTED BY THOSE TREES MATTER. ALSO, DO THE SCIENCE. TREES GENERATE WATER – I KNOW IT IS HARD TO IMAGINE.

BUT YOU HAVE TO DIG DEEP TO FIND THE SCIENCE.

Sincerely,
Esther Day

From: [Esther Day](#)
To: [Umair Shah \(Secretary@DOH.wa.gov\)](mailto:Umair.Shah@DOH.wa.gov)
Cc: [Janet Howald](#)
Subject: CALLING THIS TO YOUR ATTENTION FOR ACTION!!!
Date: Monday, October 14, 2024 11:11:57 AM

Dear Secretary Umair,

The City of Dupont is in the process of permitting a warehouse in their area and it will require the cutting down of 450 plus trees. However, after I submitted my comments, a friend who researches scientific issues, and sent me this. You have got to do something about this:

“That's before the DuPont city council. Haven't heard from anyone on it since someone came to last summer's chambers clover meeting. At that time I told her about all the contamination at that site and that Sequelitchew creek flows down the south side of the mining site, contaminated from Sequelitchew lake above. That lake was contaminated by the military base's septic. They were at the meeting as well, saying they are fixing it. All the players were at the meeting, but it was a few years back. Looks like they're trying again. It is a huge gravel mine site, creek and surface water flow into the inlet near DuPont.

None of the city council or their attny knew anything about those issues at that time, don't know who's on their council now. Need to find out where all those trees are, there weren't that many back then.”

Secretary Shah, if there is a lot of contamination of ANY KIND, it needs to be revealed and dealt with before it gets out of hand and then you and this state will have so much more on your hands than anyone thought about.

I have an old saying that I heard years ago, “If you can imagine it, it can be.”

So, please, please require all the tests necessary, have the military share information that may help prevent further contamination. Those trees, if contaminated, are more dangerous than if they just leave them be. Why? Because they won't be used for anything that could cause

more harm. DO THE SCIENCE.

NOTE: THIS IS WHERE OUR COMMENTS GO. I'M COPYING THIS INDIVIDUAL TOO SO THAT THE CITY HEARS ABOUT THIS CONCERN AND LOOK INTO THIS ISSUE MORE CLOSELY. BUT YOU, AS SECRETARY OF HEALTH CANNOT SAY YOU WERE NOT INFORMED BEFORE THE WORK.

Here is where the comments went for a hearing tomorrow.

Janet Howald

Administrative Specialist | Public Services Department
City of DuPont

Direct 253.912.5232
City Hall 253.964.8121
jhowald@dupontwa.gov

Sincerely,
Esther Day

October 16, 2024

Judy Norris
1485 Kittson Street
DuPont, WA 98327

RE: Clarification of Public Testimony on DuPont West and City Council Intent

Mr. Olbrechts,

The City Council's intent is the guiding principle for land use decisions, as reflected in the laws they have passed. Based on this intent, as outlined below, DuPont West's application for a 256,800-square-foot distribution warehouse conflicts with the Council's established policies.

Lisa Klein did not challenge my assertion at the conclusion of my testimony, which suggests she had no issue with my claim that DMC 25.45.030(17) and DMC 25.40.02 and the DuPont Comprehensive Plan prohibit freestanding distribution warehouses in the Manufacturing Research Park and Industry area along Sequelitchew Drive. While she stated in the city's rebuttal that warehouses are allowed in the Manufacturing/Research Park District, they are specifically *not* permitted to front, abut, or be adjacent to Sequelitchew Drive.

The Council used three distinct terms—adjacent, front, and abutting—to restrict warehouses along Sequelitchew Drive.

- On page 70 of the 2015 DuPont Comprehensive Plan, LU-9.2 states: "Ensure development standards limit standalone warehousing and establish limitations on uses adjacent to main streets to preserve DuPont's small-town aesthetic."
- LU-9.3 further clarifies the Council's intent: "Limit uses that front the access road extending from Center Drive to the residential areas in Sequelitchew Village to those permitted in the Business and Technology Park area."

This intent is also codified in the DuPont Municipal Code:

- **DMC 25.45.030(17):** "Warehouses shall not be located abutting a main street (DuPont Steilacoom Road, Center Drive, or the access road from Center Drive to Sequelitchew Village)."
- **DMC 25.40.20:** "All uses permitted in the commercial, office, and manufacturing/research park districts are allowed, except freestanding warehouse/distribution facilities and those listed in DMC 25.40.040."

Therefore, DuPont West's proposal for a distribution warehouse that fronts, abuts, and is adjacent to Sequelitchew Drive clearly violates both the Comprehensive Plan and DMCs 25.45.030(17) and 25.40.20.

Based on this evidence, I urge you to deny DuPont West's application.

Sincerely,
Judy Norris

October 16, 2024

To: Mr. Olbrechts, Hearing Examiner

Subject: DuPont West

In her closing staff comments at the public hearing yesterday, Ms. Klein, made a mistake saying I was referring to the code in the business tech park, rather than the Manufacturing Research Park, in my comments at the public hearing for DuPont West.

I said in my prepared remarks, "The 2015 Comprehensive Plan states on page 71, LU 9.3 to limit uses that front on the access road extending from Center Drive to the residential areas in Sequalitchew Village to those uses permitted in the Business and Technology Park Area."

DuPont Municipal Code 25.40.20 [Business and Technology Park Area] states, "all uses that are permitted in the Commercial, Office, and Manufacturing/Research Park districts, except freestanding warehouse/distribution facilities and those listed in DMC 25.40.040".

Our code, coupled with our comprehensive plan, is straightforward. Freestanding warehouses are not permitted to abut, as previously contested, to front, nor be adjacent to the access road to Sequalitchew Village.

The proposed 256,800 SF office/warehouse with over 50 loading docks and 43 tractor trailer parking spaces is nothing but a freestanding distribution warehouse.

It is very clear that the intent of the city code and comp plan is to not allow a freestanding warehouse on the access road to Sequalitchew Village.

Beth Elliott
DuPont resident

From: [Carol Estep](#)
To: [Janet Howald](#)
Subject: Comment for DuPont West development
Date: Thursday, October 17, 2024 11:10:56 AM
Attachments: [Culturally modified tree.JPEG](#)

I believe the comment period was extended to 5:00 pm Thursday October 17, 2024.

My ask is to **please save** and **protect** the over 200 year old culturally modified tree located on DuPont West Property (lot Y) and near the current Methodist Mission Monument. This tree and the Sequelitchew Creek are probably the two oldest living historical landmarks in DuPont area. When you stop and think of all the different people who walked past this tree over the years, who used this tree as a waypoint, who looked for it in their journey perhaps to locate the Sequelitchew Nisqually people, this tree has many stories to tell. This tree has lived through, experienced and shared the land with the Hudson's Bay Company and Puget Sound Agricultural Company, Methodist Mission, Buffalo Soldiers encampment of 2000 soldiers in 1904, DuPont Company making Black Powder next door to it, DuPont Company's burning grounds and dump and the contamination they left behind. I believe this tree is willing to share its land with one more man made event. A warehouse. It has managed to get along with and endure a lot over its lifetime. I hope we are NOT the people to determine it is time for it to die.

If it is **too** much to give up space for the Methodist Monument in the parking lot and this Culturally Modified Tree, then let's move the monument by the tree and fence them off from people climbing on the CMT and graffiti on the monument, and make a walkway to be able to visit both together. The Methodist Mission site covered more land than just where the monument sits.

Please, give this tree the "right to life".

Carol Estep
253-459-4339 cell
estepcarol@gmail.com

RECEIVED

OCT 16 2024

To: Barb Kincaid ICP, City of Dupont Public Services Director
Subject: Dupont West Proposal
Date: 10-15-2024

CITY OF DUPONT

My wife and I have been residents of Dupont since 2002. We moved here with the perception of the city of Dupont being a small quiet community. We acknowledge that Dupont would inevitably experience growth over the years, however not the type of growth we imagined. We have seen time and again as large corporations have been allowed to build large distribution warehouses with the accompanying loss of natural habitat, traffic and noise pollution. Unfortunately, we believe the quality of life here has been adversely affected by these commercial enterprises.

Several times a number of sites throughout the city have been earmarked for construction without regards to the city's master plan outline. It appears often that natural areas are targeted to expand their endeavors. So, once again a proposal has been submitted for yet another warehouse, but this one has some unique situations. This proposal is adjacent to the Creekside Housing complex, close to a school, and, most importantly, next to Sequalitchew Creek.

We have read the lengthy proposal and some of the highlights that concerned us were as follows:

- * 450 trees to be removed and replaced by impervious surfaces. The loss of these trees would be devastating to the environment and its inhabitants. The endangered Western Grey Squirrel would definitely be effected due to loss of habitat. This would apply to many other biodiverse animals, bird and understory plant life dependent on the canopy provided by these trees.
- * Removal of contaminated soil and replace by 44,000 cubic yards of soil with temporary erosion control. This soil removal has the potential for contaminated dust to drift onto the nearby housing thus be not only detrimental to the inhabitant but the workers and school children nearby. Due to the fact that the soil work will be done within 200 ft. of Sequalitchew Creek. The subsequent grading with temporary erosion control has the potential of flowing into the creek during periods of rainfall.
- * 45 ft height of building. No amount of small berms and immature landscape plants and trees is going to disguise a tall large warehouse.
- * Partially reroute trail adjacent to parking lot for semi-tractor trailers. The fact that the trail is parallel to the parking area ruins the aesthetics of the area.
- * Traffic: Proposal states that there will be an estimated 462 vehicular trips daily on the extended Sequalitchew drive with some starting as early as 5 AM and extending to 8 PM. In addition to the noise and air pollution it could affect traffic on Center Drive, be hazardous to children walking from school, and devalue nearby residences.

* No long term monitoring of site included in proposal. After installation of the proposed buildings, landscape, and hardscape no monitoring of long term environmental effects is included.

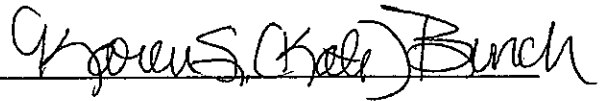
* Native American culture minimized. Native American (ie Nisqually tribe) culture was not emphasized to reflect their cultural practices. For example a culturally modified tree that is in the footprint of the proposed warehouse. These trees were used by tribes for various uses such as marking trails and indicating important locations such as burial sites.

I was a horticulturist since 1982 and a certified consulting arborist for 20 years so this might explain my concern about developing this site. My wife and I are avid outdoors people and have enjoyed many walks in Dupont, especially the jewel that is Sequelitchew Creek trail. It would be a shame to desecrate such a special place with warehouse next to it. It is our desire and hope that this proposal will not be adopted by Dupont city council. Email: [burchtrees1 @hotmail.com](mailto:burchtrees1@hotmail.com) 253-209-2083

Sincerely



Michael W Burch



Karen S Burch



NISQUALLY INDIAN TRIBE
Tribal Historic Preservation Office

4820 She-Nah-Num Drive S.E.
Olympia, Washington 98513
360.456.5221 (main)
877.768.8886 (toll free)
www.nisqually-nsn.gov

October 21, 2024

To: Barb Kincaid, AICP
Community Development Director and City SEPA Official
City of DuPont
1700 Civic Drive
DuPont, WA 98327

Re: PLNG2022-031 and PLNG2022-032

The Nisqually Tribal Historic Preservation Officer (THPO) appreciates the opportunity to submit additional comments regarding the proposed DuPont West project (City File Nos: PLNG2022-031 and PLNG2022-032). This proposed project lies within the traditional territories of the Nisqually Tribe, which is governed by the Nisqually Tribal Council. The Nisqually Tribal Council has delegated to the Nisqually Tribal Historic Preservation Officer (THPO) the responsibility of representing the Tribe with regard to cultural resources issues throughout our traditional territories under Nisqually Tribal Council Resolutions 26-2014 and 17-2024.

The Nisqually THPO requested a review of the potential cultural resource impacts of the proposed project by a Secretary of the Interior (SOI) qualified archaeologist and cultural anthropologist currently under contract with the Nisqually Tribe. This professional review has brought to our attention that the cultural resource investigations upon which the Mitigated Determination of Non-Significance (MDNS) and Staff Report and Recommendations to the Hearings Examiner partially rely are insufficient with regard to the identification of all cultural resources potentially impacted by the proposed project, the evaluation of their significance, and the identification of significant potential impacts to these resources should the proposed project be implemented. We therefore offer these comments for record and consideration by the Hearings Examiner prior to the issuance of their decision regarding the proposal.

The Nisqually THPO understands that the comment period on the MDNS has closed, and that we previously offered no objection to the MDNS based on the project's potential impacts on archaeological resources documented in the 2011 cultural resources investigation conducted by Parus Consulting, Inc. (PCI) and further analyzed in the 2023 Cultural Resources Addendum Memo and Addendum prepared by Natural Investigations Company (NIC). However, the inadequacy of the 2011 PCI investigation into Traditional Cultural Properties and Culturally Modified Trees, and NIC's subsequent reviews of PCI's reporting is quite clear.

The entire City of DuPont has been constructed within the Sequelitchew Ancestral Village Landscape of Sequelitchew, a nested Traditional Cultural Property (TCP) of immense significance to the Nisqually Tribe. The 2011 PCI report falsely characterizes the affected area of the proposed project as being within the traditional territory of the Puyallup Tribe, and denotes a sole Nisqually

village located along the upper reaches of Sequelitchew Creek. This is demonstrably untrue, and the three sole paragraphs in PCI's report dedicated to ethnography are woefully insufficient for the contextualization of cultural resources both documented, and that can be expected, within this landscape that is of enduring cultural, historical, and spiritual significance to the Nisqually Tribe, as well as being integral to the history of Euro-American settlement in Puget Sound. By failing to properly associate the affected area of the proposed project with the Nisqually Tribe, the 2011 PCI report and subsequent NCI addenda fail to recognize the potential impacts of the proposed DuPont West project on the Sequelitchew TCP and its many constituent historic properties, which include Sequelitchew Creek, numerous culturally significant glacial kettle lakes and marshes, and other locations of cultural and spiritual importance.

The report also makes unsubstantiated claims regarding the eligibility of the proposed Nisqually-Sequelitchew Historic District for listing on the National Register of Historic Places (NRHP), and two of its constituent historic properties located within the affected area of the proposed DuPont West project. These unsubstantiated claims are based on ethnocentric assumptions regarding "intact remains" as being a necessary and determinative element of NRHP eligibility, ignoring tribal perspectives on the traditional cultural significance of cultural resource locations, with or without archaeological signatures. The failure of NCI to immediately recognize, and seek to rectify, this shortcoming of PCI's reporting is concerning.

The report also fails to account for the numerous Culturally Modified Trees (CMTs) that have been observed and, thus far, informally documented within the proposed project area within Parcels 011926-6005 (Lot 1) and 011926-6006 (Lot 2). These CMTs are both archaeological sites subject to the provisions of RCW 27.53, and historic properties the Nisqually THPO has determined to be eligible for listing on the NRHP due to their archaeological and traditional cultural significance. In addition to potential impacts on trees with readily evident cultural modification, the proposed removal of species of deep and enduring cultural and spiritual significance to the Nisqually Tribe such as Oregon white oak, Pacific yew, and Pacific madrone is an adverse cultural resource impact. Because of the failure of both PCI and NCI to present an adequate cultural history of the Nisqually Tribe, these significant cultural resources that will be adversely affected by the proposed project have gone unrecognized.

The Nisqually THPO objects to the fact that NCI neither conducted, nor recommended, additional cultural resource review of the affected area of the proposed DuPont West project that meets contemporary cultural resource professional standards and expectations. The insufficiencies of both the 2011 PCI investigation and NCI's cursory reviews of PCI's then thirteen-year-old report have prevented the City from obtaining adequate insight into the very "unquantified environmental amenities and values" that are mandated to be identified and analyzed under SEPA. This has resulted in both the proposal of inadequate mitigation measures with regard to historic and cultural resource impacts, and the improper issuance of an MDNS in relation to the proposed project. Archaeological and tribal monitoring of site disturbing activities will not prevent the adverse impacts of the proposed project on historic properties of enduring significance to the Nisqually people.

With regard to Section B.5 of the Staff Report and Hearings Examiner Recommendations pertaining to the proposed DuPont West project, issued on October 7, 2024, the Staff Analysis and Conclusions regarding cultural resources and historic preservation are faulty, as they rely upon NCI's improperly scoped 2023 cultural resources "addendum memo" and "addendum" which are,

themselves, based on PCI's 2011 report; with each failing to meet contemporary professional standards regarding cultural resource investigative methodologies and reporting.

With regard to Section C.3 of the aforementioned Staff Report and Hearings Examiner Recommendations, the Nisqually THPO has serious concerns regarding the enforceability of the 1989 Memorandum of Agreement, given the fact that the agreement's provisions pertain solely to lands owned by the City and the Weyerhaeuser Real Estate Company (WRECO), the latter of which was acquired via merger by Tri Pointe in July 2014 and the Pierce County Assessor's website lists DuPont Industrial Partners, LLC as the property owner of the lands proposed for the DuPont West project.

With further regard to Section C.3 regarding the proposal's compliance with Chapter 25.80 of the DuPont Municipal Code, the Staff Analysis and Conclusions are faulty due to their reliance on inadequate cultural resource review. A desktop review of a thirteen-year-old survey is completely inappropriate to both the scale and scope of the proposed development as well as failing to meet contemporary cultural resource professional standards.

As the comment period on the MDNS has formally closed, the Nisqually THPO respectfully requests that the Hearings Examiner reject the DuPont West proposal based on the failure of the proponent to provide the City with the information necessary to the assessment of the proposed project's impacts on cultural resources which, according to our analysis, are slated to be adverse and extremely significant.

Thank you for consulting with the Nisqually Tribe.

Brad Beach, THPO
Nisqually Indian Tribe
360-528-1084
360-456-5221 ext 1277
beach.brad@nisqually-nsn.gov

cc: Annette Bullchild, Director, Nisqually Indian Tribe

Janet Howald

From: Barbara Kincaid
Sent: Tuesday, October 22, 2024 11:41 AM
To: Janet Howald
Subject: FW: DuPont West project
Attachments: PXL_20241022_163859860.RAW-01.COVER.jpg; Resized_20230803_101125.JPEG; Resized_20230803_100908.JPEG

From: ROBIN BARROW <barpow1@msn.com>
Sent: Tuesday, October 22, 2024 9:47 AM
To: Barbara Kincaid <bkincaid@dupontwa.gov>
Subject: DuPont West project

Director Kincaid,
Attached is a letter I am submitting in response to the hearing on October 15th for the DuPont West project. I would also like to submit two images of what I have been told is a Cultural Modified Tree located on the property. I would like to have these images included in the record.
Thank you,
Robin Barrow

Get [Outlook for Android](#)

October 21, 2024

City of DuPont
Attn: Barb Kincaid
1700 Civic Drive
DuPont, WA. 98327

Dear Director Kincaid,

This letter addresses the DuPont West (formerly DuPont 243)

I would like to state I am not opposed to developing the property. I would like to suggest that the owner consider an alternative to the warehouse. There are examples of developments throughout King, Pierce, and Thurston counties of light manufacturing and offices designed to include and incorporate the natural environment and lessen the impact on natural habitat. This will also allow for preserving the historical and cultural trees, artifacts, and markers that are so important to the history of this region. Thurston County has some good examples of office structures in and around College Street. Federal Way also has some developments along S. First Ave. There are developed structures where the natural environment was envisioned and allowed to coexist. Smaller buildings within the property would provide needed office and small manufacturing facilities.

We can be better stewards of our natural world and save our history and still build for the future.

Thank you for your time and valuable work on this project.

Sincerely,

Robin Barrow
Resident of DuPont

