



CITY OF DUPONT

DEPARTMENT of Community Development

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PLANNING DIVISION

STAFF REPORT & RECOMMENDATION TO THE HEARING EXAMINER - REVISED

Project: Champions Centre
File Numbers: PLNG2023-010,-011,-013,-014
Date of Report: November 12, 2025
From: Patrick Kelly, AICP
AHBL, Inc., Planning Consultant to the City

Via:

Barb Kincaid, AICP
City of DuPont, Public Services Director

Public Hearing: November 18, 2025 at 2:00 PM
1700 Civic Drive
Dupont, WA 98327

SUMMARY OF REQUEST: The applicant is seeking the following permits, the applications will be reviewed concurrently, and a public hearing will be required.

- SEPA Environmental Review (PLNG2023-013)
- Type I – Design Review (PLNG2023-010)
- Type II - Site Plan Review (PLNG2023-010)
- Type III - Critical Areas Permit (PLNG 2023-014)
- Type III - Tree Modification (PLNG2023-011)

PROJECT DESCRIPTION: The proposal is for the construction of a church to accommodate a congregation of approximately 350 people, as well as a separate 3,000 square foot eating and drinking establishment. The subject property consists of four legal lots of record, which upon approval of a lot line elimination, will become three lots. The lot line elimination would be accomplished through a boundary line adjustment, required as a condition of approval of the project. Although the property consists of approximately 21.29 acres, only approximately 4.1 acres are proposed to be developed, as follows:

- Lot A will be approximately 139,369 square feet upon which a 26,000 square foot church and associated parking lot will be constructed.

- Lot B will be approximately 34,601 square feet upon which a 3,000 square foot eating and drinking establishment will be constructed, along with EV parking as an accessory use open to the public.
- Lot C will be approximately 753,056 square feet (17.28 acres) upon which a Category 2 wetland (Bell Marsh) and associated buffer are located, and which may be conveyed to the city at the time Lots A and B are developed.

The proposal also includes a request to remove regulated landmark trees and to reduce the standard wetland and stream buffer.

LOCATION: The subject property is located on the southeast edge of the city at the intersection of DuPont Steilacoom Road and Barksdale Avenue. The proposal involves tax parcel numbers 0119362039, 0119362009, 0119362012, and 0119362043, which are located in Section 36 Township 19 Range 01 Quarter 21.

The portion of the subject property to be developed (proposed Lots A and B) is located in the Historic Village, and a portion of the wetland parcel, Lot C, is located in the Bell Hill Village. All subject parcels are in the Commercial zoning district and are surrounded by other Commercial zoned properties to the south and southeast and by Open Space and R-3 to the north and northwest.

Parcel 0119362043, proposed Lot C, is predominately covered by the Bell Marsh wetland and associated stream and is within a 1% Annual Chance Flood floodplain. The subject property also contains several stands of trees, some of which are landmark status and concentrated on an elevated portion of the eastern edge of the site fronting Dupont-Steilacoom Road. The southwestern portion of the site fronting Barksdale Avenue is mostly flat and gently sloping downward northeastward toward the wetland where topography becomes more variable.

APPLICANT: Wendy Garrison
LeRoy Surveyors & Engineers, Inc.
P.O. Box 740, Puyallup, WA 98371

SUMMARY OF RECORD: Refer to the list of attachments provided in Section E, which includes the permit application submittal materials, public notices, public comments, and agency review comments (Attachments 1-6).

SUMMARY OF RECOMMENDATION: Staff recommends approval with conditions of the following applications:

1. SEPA Environmental Review (PLNG2023-013)
 2. Type I Design Review (PLNG2023-010)
 3. Type II Site Plan Review (PLNG2023-010)
 4. Type III Critical Areas Permit (PLNG 2023-014)
 5. Type III Tree Modification (PLNG2023-011)
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A. FINDINGS OF FACT:

1. Permit Processing Procedures

- a. **Type III Permits:** Per 25.105.080 and 25.120.050, the Critical Areas Permit (PLNG2023-014) and the Tree Modification Request (PLNG2023-011) shall be reviewed and processed as Type III procedures as set forth in 25.175.010. Type III procedures require noticing, a public hearing, and the final decision by the City's hearing examiner, who will provide written findings and make determinations following the public hearing.
- b. **Type II Permits:** Per 25.150.020, Site Plan Review (PLNG2023-010) shall be processed as a Type II procedure as set forth in 25.175.010. Type II procedures require noticing and the final decision by the City's Community Development Director.
- c. **Type I Permits:** Per 23.01.080 and 25.70.010 the SEPA Environmental Review (PLNG2023-013), and Design Review (PLNG2023-010) shall be processed with a Type I procedure as provided in 25.175.010. Type I procedures do not require noticing and the decision is made by the City's Community Development Director.
- d. **Preapplication Review:** Per 25.175.020 a preapplication review is required prior to filing for Type II, III, or IV procedures. The applicant submitted a preliminary review request on March 27, 2023.

2. Noticing

- a. A Notice of Complete Application was issued to the applicant on January 16, 2024 as required for the Type II and III permits.
- b. A Notice of Application with Optional DNS was issued on January 19, 2024. The Notice was posted on site, at City Hall, and published in the News Tribune. A 14-day public comment period was held from January 19, 2024 through February 2, 2024 during which time several comments were received and provided as Attachments 5 and 6.

There were 19 comments submitted expressing concern about the project, the majority of which addressed the loss of existing oak trees on the property due to the project. Other issues of concern were the classification of Bell Marsh as a class 1 or 2 wetland, general wetland impacts, vehicle traffic generation, visual compatibility with the Historic Village, and temporary construction impacts. There were also twenty comments submitted in support of the project.

A SEPA Notice of Decision to Issue an MDNS was issued on October 20, 2025, with the appeal period ending on November 3, 2025 at 5:00 PM.

- c. A Notice of Public Hearing announcing the date and location of hearing was issued on October 28, 2025 to all parties of record.

3. Comments

The following agencies reviewed the proposal and provided comments summarized below and attached as exhibits, recommendations and conditions for which have been incorporated into this staff report under section E.

- a. **Fire Department:** The Fire Department indicated they had no comments on the project.
- b. **Building Official:** The Building Department indicated they had no comments on the project.
- c. **Transportation:** A Traffic Concurrence was issued on June 17, 2025. No further concerns or comments.
- d. **Engineer/Survey:** Engineering comments related to frontage improvements, underground infrastructure (water, sewer, etc.), grading, stormwater controls, and site improvements.

- e. **Public Works:** No concerns or further comments.

B. CONSISTENCY WITH CITY DEVELOPMENT REGULATIONS

The following Section B.1. presents staff analyses for consistency review for Site Plan Review. Consistency with the requirements of DMC Chapter 25.105, Critical Areas, is provided in the Critical Areas Analysis, Section B.2. Consistency with DMC Chapter 25.120, Tree Retention, is provided in the Tree Modification Review Analysis, Section B.3. Consistency with the requirements of DMC Chapter 25.70, Commercial and Mixed Use Design Regulations and Guidelines, is provided in the Design Review Analysis, Section B.4.

1. Site Plan Review (PLNG2023-010)

Per DMC 25.150.030, Site Plan Review requires that the proposal be carried out in a manner consistent with the criteria specified in the following:

- **Zoning District Requirements:** All of the development regulations and criteria specified in the district applicable to the property must be satisfied.
- **General Development Requirements:** Any applicable regulations under Chapters 25.75 through 25.95 and 25.105 through 25.125 must also be met.
- **Comprehensive Plan:** The proposal will be reviewed for consistency with the Comprehensive Plan Village/Planning Area in which it is located.

a. Zoning District Requirements

The subject property is within the Commercial (COM) zoning district requirements for which are specified under DMC Chapter 25.25.

DMC 25.25.020 Permitted Uses

Uses allowed within the COM zoning district are specified in this section.

***Staff Analysis and Conclusion:** Churches are not explicitly listed as a permitted use in the COM zoning district in either DMC 25.25 Commercial District or the appendix table of permitted uses, however; quasi-public uses are listed as permitted in the COM zoning district under DMC 25.25.020 (7) and according to the definition under DMC 25.10.170.005, quasi-public uses are defined as those which serve nonprofit social or religious ends, such as churches, therefore the proposed church is a permitted use. The proposed eating establishment is a permitted use in the COM zoning district per DMC 25.25.020 (2).*

DMC 25.25.025 Accessory uses.

Accessory uses allowed within the COM zoning district are specified in this section.

***Staff Analysis and Conclusion:** The proposal includes electric vehicle charging spaces intended for church attendees and general public use. Electric vehicle charging is a permitted accessory use in the COM zoning district under this section. DMC Chapter 25.126 Electric Vehicle Facilities includes design criteria and guidelines for electric vehicle charging facilities. The electric vehicle parking and charging facilities meet these standards as proposed.*

DMC 25.25.050 Building bulk restrictions.

The COM zoning district building bulk restrictions include a maximum building height and front yard setback requirements. The maximum allowed building height is 50 feet, however, structures within 100 feet of a residential district shall not exceed 35 feet in height. The front yard setback is required to be between zero and 20 feet.

***Staff Analysis and Conclusion:** The proposed building heights are 24 feet and 18 feet, meeting the height limits of this section. Both proposed buildings are sited to abut the front*

property line as defined in DMC 25.10.160.110 along DuPont-Steilacoom Road with no front yard setbacks. The main church building is setback 10-feet from the other front property line along Barksdale Avenue and includes landscaping. As proposed, both buildings meet the front yard setback requirements of this section.

DMC 25.25.060 Site plan approval.

Per this section, site plan approval is required for all development projects. If the proposed project includes less than 50,000 square feet of building area, then site plan review shall be processed as a Type II permit. If proposed building area exceeds 50,000 square feet, site plan review shall be processed as a Type III permit.

Staff Analysis and Conclusion: *The combined area of the proposed buildings is approximately 29,000 square feet, and therefore site plan review is being processed as a Type II permit.*

b. General Development Requirements

Per DMC 25.150.030, in addition to specific zoning district development requirements, the general development requirements of DMC Chapters 25.75 through 25.95 and 25.105 through 25.125 must also be met.

DMC Chapter 25.75 Commute Trip Reduction

Commute Trip Reduction (CTR) is applicable to new businesses that employ more than 100 persons.

Staff Analysis: *The SEPA checklist provided with the application states that upon completion the church would likely have 15 to 25 employees, therefore DMC Chapter 25.75 does not apply to this project due to having less than 100 employees.*

DMC Chapter 25.80 Cultural, Historical, and Archaeological Resources

This section regulates construction within areas of potential historical or cultural resources and allows for conditions to be imposed on any plat, site plan, or permit to assure that such resources are protected, preserved, or collected. The City has four designated cultural resource sites listed under DMC 25.80.020. Additionally, per DMC 25.80.040, the City maintains a map showing potential cultural resource areas and reviews every development proposal to ensure appropriate measures are taken to protect cultural, historical, and archaeological resources areas.

Staff Analysis and Conclusion: *The proposal is not within, nor does it contain any of the City's designated cultural resource sites listed under this section.*

A cultural resources study was prepared for the subject property by Drayton Archaeology dated August 15, 2023. Drayton's cultural resources assessment consisted of a thorough background review, field investigation, and production of this report. Background review concluded the project is in an area of moderate probability for cultural resources based primarily on the property's proximity to known archaeological sites, topography, and ecological context. On-site fieldwork included systematic visual reconnaissance and subsurface investigation of areas of proposed impact. No precontact or historic archaeological deposits were encountered within the project area during Drayton's field investigation. Drayton recommends the project proceed with no additional archaeological oversight.

Although no archaeological management or mitigation measures are recommended, the project is located within an area of moderate probability for encountering cultural resources.

A general inadvertent discovery plan (IDP) for the information of all involved in the project shall be adhered to, as required by Condition 9. It is the responsibility of all involved to ensure proper consideration for cultural resources and to develop archaeological mitigation strategies, as needed.

A Memorandum of Agreement (MOA) dated August 7, 1989, was executed between Weyerhaeuser Real Estate Company (WRECO) (the previous landowner), the City of DuPont, and the Washington State Historic Preservation Officer regarding the discovery of cultural resources within the City of DuPont, customary professional standards for archaeology, and applicable state and federal laws. Implementation of the MOA requires archaeological monitoring during soil disturbing activities, including extending an invitation to the Nisqually Tribe to be present during such activities, and preparation of a closing report.

Accordingly, the SEPA Determination (See Attachment 4d) includes a requirement for a general inadvertent discovery plan (IDP). A condition of approval has been incorporated to implement the IDP found in Cultural Resources Assessment for the project, as a condition for site plan approval (See Condition 9).

DMC Chapter 25.85 Affordable Housing Incentives.

The affordable housing incentives program provides incentives for affordable housing.

Staff Analysis and Conclusion: *Housing is not a component of the proposal therefore DMC Chapter 25.85 is not applicable to the proposed project.*

DMC Chapter 25.90 Landscaping

i. DMC 25.90.020 Substantive requirements – Proportion of landscape areas.

This section requires commercial uses to provide a minimum of 20% landscape coverage. Critical areas and the associated buffers do not count towards this requirement.

Staff Analysis and Conclusion: *The proposed landscaping covers approximately 29% of Lots A and B, over the minimum 20% landscape coverage required of DMC 25.90.020. This calculation does not include Lot C as specified in this section because it is occupied by the critical area and associated buffer. Some existing trees are proposed to be retained as encouraged by this section.*

ii. DMC 25.90.030 Substantive requirements – Landscaping.

- (1) Street Trees. At time of street construction, or time of development of the adjoining land, street trees and related landscaping shall be provided in medians and parking strips within the right-of-way in accordance with the city's public works standards. Street trees shall be:

- (a) Provided at least one per 40 to 50 feet of frontage, depending on the tree species and other circumstances;
- (b) Located within the street right-of-way;
- (c) Of the same species as other street trees in the same streetscape;
- (d) Spaced to accommodate sight distance requirements for driveways and intersections; and
- (e) At least two inches caliper measured six inches above the ground line with a single-stem and minimum branch height of six feet.

- (2) Interior Parking Lot Landscaping. To provide shade and visual relief, the interior of surface parking lots with 10 or more stalls shall be landscaped with at least one tree per six stalls.

(3) Buffers. Though the comprehensive plan is designed to minimize adjacent, incompatible land uses, such incompatibilities sometimes arise in detailed site planning. In these cases, a buffer (see DMC 25.10.020, B definitions) is required, as follows:

- (a) A moderate buffer shall be provided between parking lots and any adjacent public right-of-way.
- (b) In the process of reviewing development proposals, the city will require full, moderate, or light buffers as necessary to mitigate incompatibility, for example between residential and nonresidential development, or between an outdoor storage or trash receptacle area and surrounding high-use areas.

Staff Analysis and Conclusion: *The proposed street trees, interior parking lot landscaping, and landscape buffers provide screening between the proposed parking areas and residential uses to the north and adjacent rights-of-way meeting the intent and requirements of DMC 25.90.030 as follows:*

- *The existing Barksdale Avenue median trees and landscaping will be retained.*
- *A total of 21 street trees, specified as *Styrax japonicus* with 2-inch calipers, are proposed every 40-50 feet along the Steilacoom DuPont Road frontage. These trees will replace some existing cherry trees proposed to be removed from the Steilacoom DuPont Road right-of-way. Note, however, that DMC 25.70.060 requires tree spacing of no more than 30 feet on center. This section is similar to the street tree requirements in DMC 24.90.030(1), which require spacing at 40 to 50 feet. Per DMC 25.05.040(3), the stricter requirements to plant street trees at no more than 30 feet on center of DMC 25.07.060 apply. A condition of approval (Condition 68) is included requiring the plans be revised to show compliance with this section.*
- *A total of 13 existing street trees identified as cherry and spaced approximately 25 feet apart are proposed for retention in the right-of-way fronting Barksdale Avenue.*
- *A 30 by 30-foot sight triangle at the intersection of Barksdale Avenue and Steilacoom DuPont Road is shown on the landscape plans to maintain unobstructed sight lines.*
- *The proposed interior parking areas include a tree at least every 6 stalls.*
- *Screening is proposed in areas where parking is adjacent to the street and includes 10-foot moderate landscape buffers consisting of trees, evergreen shrubs, and ground cover between the parking area and right-of-way edge fronting Barksdale Avenue and Steilacoom DuPont Road.*
- *Screening is proposed in areas where parking is adjacent to single family uses along the northern perimeter and includes a 10–15-foot moderate landscape buffer consisting of a variety of native trees, evergreen shrubs, and groundcover in addition to a four-foot-tall concrete block wall and a six-foot-tall solid wood fence.*
- *The proposal includes trash and recycling collection areas in the parking area perimeter of both proposed lots/uses that include landscape screening.*

iii. DMC 25.90.040 Substantive requirements – Water conservation

Per this section, all required landscape plans include a water conservation element including a statement of the techniques proposed to conserve water and a projection of the amount of irrigation the proposed landscape will require, in gallons per square foot

of landscaping, excluding retained native vegetation, per year. Irrigation projections shall not exceed: 11.6 inches; or 7.2 gallons per square foot; or 313,632 gallons per acre.

Staff Analysis and Conclusion: *The applicant provides a water conservation statement on the landscape plans as required under DMC 25.90.040 that includes estimated irrigation calculations that document an estimated water usage of 6.13 gallons per square foot, under the maximum 7.2 gallons per square feet specified in this section. Landscape plans also specify native drought tolerant plants and mulching.*

iv. DMC Chapter 25.95 Off-Street Parking

DMC 25.95.030 Number of spaces

This section establishes the minimum and maximum number of off-street parking spaces allowed based on the type of use. Places of public assembly, which includes churches, are required to provide a minimum of 0.15 and a maximum 0.4 off-street parking spaces per person at maximum capacity. Eating and drinking establishments require a minimum of 8 and a maximum of 16 parking spaces per 1,000 square feet open to the public.

Staff Analysis and Conclusion: *The proposed Lot A church building capacity is 350 requiring a minimum of 53 off-street parking spaces be provided and a maximum of 140 off-street parking spaces allowed. The proposed church parking area includes a total of 136 parking spaces including 8 electric vehicle parking spaces, 5 standard ADA parking spaces, 1 van ADA parking space, and 122 standard parking spaces. All proposed parking spaces are within 500 feet walking distance from the church entrance, meeting the requirements of this section.*

The proposed Lot B development includes a 3,000 square foot eating and drinking establishment which is required to have a minimum of 24 parking spaces and allowed up to 48 parking spaces. The proposal includes a total of 39 parking spaces including 11 electric vehicle parking spaces, 1 standard ADA parking space, 1 ADA van parking space, and 26 standard parking spaces, meeting the requirements of this section.

DMC 25.95.040 Location.

All off street parking is required to be within 500 feet of the building entrance. No parking is allowed in the required vision clearance triangle, required front yards, or required side yards abutting residential areas.

Staff Analysis and Conclusion: *The proposed off-street parking spaces are within 500 feet of the building entrances and connected with delineated pedestrian walkways. Parking is proposed in some instances adjacent/fronting both Barksdale Avenue and Steilacoom DuPont Road as well as within the area abutting residential uses to the north. Parking in these areas include 10-foot moderate landscape screening buffers.*

DMC 25.95.050 Development standards.

Off-street parking facilities are required to comply with the standards listed under this section included but not limited to driveway width and location, surface materials, drainage, traffic control, pedestrian connections, and general design.

Staff Analysis and Conclusion: *The proposal meets the off-street parking area development standards specified in this section as follows:*

- *The proposed driveways are at least 10 feet wide per lane and located along the streets away from any intersection or pedestrian crossings so as not endanger or impeded traffic.*

- *The proposed two-way drive aisle is at least 26 feet wide to accommodate for emergency vehicle access.*
- *The proposed parking area design will allow vehicles to turn around and will not require any vehicles to back onto a street.*
- *The proposed parking area surface is specified as paved with stalls delineated by surface striping and wheel stops or elevated curbs.*
- *The proposed parking area includes convenient pedestrian crossings and pathways that are clearly delineated.*
- *The proposed parking areas include 10-foot moderate landscaping buffers to screen the parking areas from the adjacent right-of-way and residential use.*

DMC 25.95.060 Preferential parking and high-occupancy vehicles.

This section requires that ADA parking be provided as required by the state and establishes a standard for high-occupancy vehicle parking.

Staff Analysis and Conclusion: *Per 2018 Washington State building code, if providing 101-150 parking spaces, a minimum of 6 accessible parking spaces is required to be provided. The proposed church includes 5 standard ADA and 1 van ADA parking spaces, meeting the requirement.*

Providing 26-50 parking spaces requires a minimum of one ADA parking space be provided. The proposed eating establishment includes 39 parking spaces, including 1 standard ADA and 1 van ADA parking space, meeting the state minimum accessible parking requirements.

The proposed church will have approximately 15-25 employees and therefore a high occupancy vehicle space is not required per this section.

v. DMC Chapter 25.100 – Recycling

At least one storage enclosure for refuse and recycling receptacle shall be located outside required yards or buffer areas, comply with DMC 25.70 (Commercial and Mixed-Use Design Regulations and Guidelines), be designed to match the primary building in terms of design and materials, be easily accessible to users, and have adequate vertical and turning clearances for collection equipment.

Staff Analysis and Conclusion: *The proposal includes onsite refuse and recycling enclosures for both proposed lots/uses as required by this section. The enclosures are 10 feet by 20 feet, meeting the minimum 100 square foot size requirement. The enclosures are located in the parking area perimeters adjacent to proposed Lot C and are fenced and include landscape screening; however, the Commercial Design Regulations and Guidelines require that it be enclosed by solid materials matching the building. A condition of approval is included requiring the enclosures be designed to match the proposed building (Condition 3).*

The applicant provided confirmation from LeMay, the service provider, that the size of the proposed refuse and recycling containers and enclosure is adequate for the proposed uses.

vi. DMC Chapter 25.105 Critical Areas

Staff Analysis and Conclusion: *The subject property includes a critical area and is subject to the requirements of this section. The applicant submitted a Critical Areas Permit application and associated materials for which review comments and conditions are provided in section B.2 of this report.*

vii. DMC Chapter 25.110 Setback – Street Corners

On corner lots no building, structure, parking, sign, berm, planting, or other sight-obscuring object, other than traffic signs and utility poles, shall be erected, placed, or allowed to grow between the heights of three feet and eight feet above the street surface within the vision clearance triangle. The vision clearance triangle (see Figure 1) is that area enclosed on two sides by the intersecting public right-of-way lines and on the third by an imaginary line connecting those points on said right-of-way lines that are 30 feet from their point of intersection.

***Staff Analysis and Conclusion:** The subject property is on the corner of Barksdale Avenue and DuPont-Steilacoom Road. The plans submitted indicated a sight distance triangle extending 30 feet in either direction from the point of intersection depicting clear unobstructed sight lines that meet the requirements of this section.*

viii. DMC Chapter 25.115 Transportation Concurrency review

Transportation Concurrency Review requires a concurrency test for projects requiring site plan and design review.

***Staff Analysis and Conclusion:** The project is in full compliance with the Transportation Concurrency requirements, as documented in a June 17, 2025 memorandum by the City's Transportation Engineer.*

ix. 25.116 Sign Code

Any proposed signage is subject to the requirements of this section.

***Staff Analysis and Conclusion:** A request for a sign permit was not submitted with the proposal. A sign permit shall be required if signage is proposed.*

x. DMC Chapter 25.120 Tree Retention

***Staff Analysis and Conclusion:** A Tree Modification Permit application was submitted with this proposal for which review comments and conditions are provided in Section 3 of this report.*

xi. 25.125 Wireless Communication Facilities

This section includes provisions for wireless communication facilities.

***Staff Analysis and Conclusion:** No wireless facilities are included with the proposal.*

COMPREHENSIVE PLAN

Per 25.175.040, in addition to consistency with the development regulations applicable to the proposal, the city is required to evaluate proposal consistency with the DuPont Comprehensive Plan and applicable Village, addressing the following:

- i. The type of land use permitted at the site, including uses that may be allowed if the criteria for their approval have been satisfied;
- ii. The level of development, such as units per acre, density of residential development in urban growth areas, or other measures of density;
- iii. Availability and adequacy of infrastructure and public facilities identified in the comprehensive plan;
- iv. Whether the plan or development regulations provide for funding of these facilities as required by Chapter 36.70A RCW; and

- v. The character of the proposed development, as authorized by development standards.

Staff Analysis and Conclusion:

The project site is within the Commercial Designation of the Comprehensive Plan. The purpose of this district is to permit uses that are allowed in the commercial district, the office district, and residential zone district. This area is intended to provide office space, goods and services to the entire community or larger market. As discussed in the Zoning District Requirements of this Staff Report, churches are an allowed use within the Commercial zoning district. Regarding development intensity, the project is consistent with the allowed maximum height and setback requirements of the Commercial zone. The project has been reviewed by the Public Works Department and Fire Department, and no infrastructure deficiencies have been identified.

The subject property is in the Historic Village planning area, which is recognized in the 2015 DuPont Comprehensive Plan as the birthplace of the community. The Historic Village is approximately 166 acres and includes park land, open space, lower density residential, multi-family residential, and commercial uses. The Historic Village is listed on both the State and National Register of Historic Places due to its significance as one of the few remaining company towns in the state and because of the purity of the historic architecture. The purpose of the National Register is to record those tangible remainders of United States history deemed important enough to be worthy of preservation. The listing also assures protective review of Federal projects that might adversely affect the character of the historic district. Because of DuPont's local, state and national historical importance, every attempt should be made to preserve the character of the original company town as the city grows. The Historic Village discussion within the Comprehensive Plan states commercial and other development uses near the entrance to the Historic Village (at DuPont-Steilacoom Road and Wilmington Drive and exit 119 off I-5) should also reflect DuPont's historic character and unique charm. The proposed church is separated from the Historic Village by a four-foot boundary wall and landscaping, including a row of trees. This wall is of concrete block, which is compatible with the stone construction of the nearby village entry markers on either side of Barksdale Road. The proposed church building is separated from the Historic Village residences by approximately 200 feet and includes colors and materials that are compatible with the village, such as scored concrete painted brown, blue, and shades of grey.

2. CRITICAL AREAS PERMIT

a. DMC 25.105.040 Applicability.

This chapter establishes regulations for the protection of properties which contain or are adjacent to critical areas. Critical areas are those which are now or may in the future be identified under the provisions of this chapter. The provisions of this chapter apply to development projects and actions undertaken by individuals and private or public entities.

Staff Analysis and Conclusion: *The subject property includes critical areas and are therefore subject to the regulations specified under DMC Chapter 25.105 – Critical Areas.*

b. DMC 25.105.050 Critical areas.

Within the jurisdiction of the city of DuPont, there are four critical area categories known to exist. This section provides descriptions and requirements for critical area identification and delineation; required buffers for critical areas; required mitigation sequence and measures if development or alteration impacts are unavoidable in or adjacent to a critical area; and requirements for management and protection of critical areas.

The subject property includes two of the critical area categories in this section and is therefore subject to the following regulations under this section:

DMC 25.105.050 (1) Wetlands and Lakes (a-d)

DMC 25.105.050 (2) Fish and Wildlife Habitat Conservation Areas (a-i)

A critical areas report was prepared for the subject property by Grette Associates dated July 2019, [revised in May 2024](#). Grette Associates visited the subject property on April 30, 2019, to conduct an assessment to identify any wetlands or streams within 200 feet of the subject property.

Grette Associates collected wetland delineation data and delineated one wetland feature (Wetland A - Bell Marsh) that contained all three wetland criteria defined in the U.S. Army Corps of Engineers (USACE) Federal Wetland Delineation Manual (1987), and the USACE's Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0) (2010).

Wetland A was rated according to DMC 25.105.050 and the Washington State Department of Ecology's (Ecology) Washington State Wetland Rating System for Western WA – 2014 Update (Hruby 2014). A summary of the delineated wetland is provided in Table 1.

Table 1. Wetland delineation summary

Feature	Size	Cowardin Class ¹	Hydrology Modifier	HGM Class	Wetland Category	Buffer Width ²
A/Bell Marsh	20 acres	PAB/EM/S S/FO	Permanently Flooded and Seasonally Flooded	Depressional	II	100 ft.

¹ Classification based on Cowardin et al. (1979).

² Buffers are based on DMC 25.105.050.

One natural water feature consisting of a stream (PS-1) was identified within 200 feet of the subject property in the critical areas report prepared for the proposal by Grette Associates dated July 2019. An ordinary high-water mark (OHWM) determination was not completed given its location within Wetland A.

This stream flows into the southern portion of Wetland A where a large stormwater pipe discharges. A summary of the stream is provided below in Table 2.

Table 2. Natural water feature identification summary

Feature	Water Type ¹	Buffer ²
PS-1	F	100 ft.

¹ Natural water features were rated according to DMC 25.105.030 and WAC 222-16-030.

² Buffers are based on DMC 25.105.050

Grette identified the Fish and Wildlife Habitat Conservation Areas (FWHCAs) within 200 feet of the subject property in the critical areas report. Stream PS-1 as well as Bell Marsh are classified as a Type F stream/feature. Mapped distribution of salmonids within PS-1, Bell Marsh, and the stream associated with the outlet of Bell Marsh is limited to resident coastal cutthroat trout (WDFW 2019a and 2019b).

Furthermore, PS-1 and Bell Marsh are part of a mosaic wetland and stream complex that forms the headwaters of Sequelitchew Creek, which is only mapped (presumed and/or documented) as providing habitat for coho salmon (*Oncorhynchus kisutch*) and resident coastal cutthroat trout (WDFW 2019b). No state or federally listed salmonid species are mapped within the Sequelitchew Creek system.

In addition to the critical areas report, Grette Associates prepared a wetland buffer mitigation plan and a habitat management plan for the proposal dated November 22, 2024, and updated

August 5, 2025.

Staff Analysis and Conclusion: Ecological Land Services (ELS) provided peer review of the Champions Centre critical areas report, wetland buffer mitigation plan, and habitat management plan submitted with the application.

- ELS found the Bell Marsh wetland identification and delineation of the boundaries to be in accordance with DMC 25.105.050(1)(a)(i).
- ELS found the categorization of the Bell Marsh wetland as a Category II to be conducted in accordance with DMC 25.105.050(1)(a)(ii).
- DMC 25.105.050(1)(b)(i) describes Category II wetlands as requiring a 100-foot buffer. The current project design proposes a reduction of the recommended 100-foot buffer to between 36 feet to 100 feet along the wetland edge. Per DMC 25.105.050(1)(b)(iv), buffers can be reduced with enhancement when an applicant can prove the buffer fits the following criteria: (A) The existing condition of the buffer is degraded; and (B) Additional protection to the wetland is provided through the implementation of a buffer enhancement plan. Accordingly, a buffer mitigation plan was prepared for the project by Grette Associates dated November 22, 2024 and revised on August 5, 2025. The enhancement plan was peer reviewed by Ecological Land Services (ELS) on January 25, 2025, August 2, 2025, and October 30, 2025. The peer review concluded the buffer mitigation/enhancement plan meets the DMC requirements and adequately improve the function of the buffer and provide additional protection to the wetland through removal of invasive plants and installation of native trees and shrubs.
- The proposal includes stream and stream buffer alterations described in DMC 25.105.050(2)(a). When a stream buffer is encroached by a development that is not an allowable activity, mitigation is required per DMC 25.105.050(2)(c)(i). Per DMC 25.105.050(2)(g), the stream is identified as a natural water feature and meets the criteria for a Type F water for which a 100-foot buffer is required. A reduced buffer for 55 feet is proposed for a short portion of the stream, with the remainder of the stream having 100-foot buffer. Per DMC 25.105.050(2)(i), a habitat management plan (HMP) is required. An HMP was prepared for the proposed development by Grette Associates, LLC, dated August 5, 2025. The ELS peer reviews found the HMP to meet the requirements of the DMC because it proposes additional protection to the wetland through removal of invasive plants and installation of native trees and shrubs. In addition, permanent and temporary impacts will be compensated for through the enhancement plan.

c. 25.105.080 Critical area permit submittal requirements.

The critical areas permit review procedures, submittal requirements, and criteria for approval are established under this section.

Staff Analysis and Conclusion: The permit application will be processed as a Type III permit as specified under DMC 25.105.080(1). The applicant included all necessary items as specified under DMC 25.105.080(2) and (3).

Per DMC 25.105.080 (4)(a), an application for a critical areas permit may be approved, approved with conditions, or denied based on the proposal's ability to comply with all the criteria listed under this section. ELS's review of the critical areas report, habitat management plan, and buffer mitigation plan confirm that these criteria have been met:

- (i) The proposed development includes mitigation measures that will minimize the impact on the critical areas in accordance with this section.

- (ii) *The proposal does not pose an unreasonable threat to the public health, safety, or welfare on or off the development proposal site;*
- (iii) *The proposal is consistent with the general purposes of this chapter and the public interest;*
- (iv) *Any alterations permitted to the critical area are mitigated in accordance with the mitigation requirements and standards of this chapter;*
- (v) *The proposal protects the critical area functions and values consistent with the best available science; and*
- (vi) *The proposal is consistent with other applicable regulations and standards. The granting of a critical areas permit should not be construed as approval of any other required underlying permit or approval for the development proposal.*

In conclusion, the proposal meets the applicable critical areas requirements under DMC Chapter 25.105 and approval is recommended with conditions.

3. TREE RETENTION MODIFICATION REQUEST

a. DMC Chapter 25.120 Tree Retention

This chapter applies to all new development projects that require site plan approval.

b. DMC 25.120.030 Tree retention.

DMC 25.120.030 (2), requires all landmark Oregon white oak trees to be retained, along with any native understory within a protection zone one and one-half times the radius of the oak's canopy.

Per DMC 25.10.120.005, landmark trees include Oregon white oak, pacific yew, or madrona with a DBH of 24 inches for single trunk and 30 inches for multi-trunk and doug fir, western red cedar, western hemlock, or big leaf maple with DBH of 30 inches for single trunk and 45 inches for multi-trunk.

DMC 25.120.030 (3) requires a minimum of three trees per acre be retained in the commercial district. This number does not include street trees and is expressed as an average over the entire site plan, however no more than half of the existing trees, other than oak, require the retention.

DMC 25.120.030 (5) prohibits clearing, grading, trenching, impervious surfacing, or other construction within the drip line of any tree being retained.

Staff Analysis and Conclusion:

An arborist report prepared by Greenforest dated January 29, 2025, and a tree retention plan prepared by LeRoy Surveyors & Engineers dated January 28, 2025 was submitted with the application and included the following existing tree inventory and proposed retention and removal:

Total trees on site: 84

Total trees on site, in ROW, and off-site: 109

Total landmark trees on site: 22

Total landmark oak trees: 7

Total landmark oak trees to remain: 4 (57%)

Total landmark oak trees to be removed: 3

Total landmark non-oak trees: 15

Total landmark non-oak trees to remain: 9 (60%)

Total landmark non-oak trees to be removed: 6

Total specimen trees on site (including oak trees): 49
Total specimen trees to remain: 19 (60%)
Total specimen trees to be removed: 30
Total trees in ROW and off-site: 25
Total trees in the ROW and off-site to be retained: 19
Total trees in the ROW and off-site to be removed: 6
Total landmark and specimen hazard trees to be removed: 13
Total trees to be retained on site: $32/84 = 38\%$
Total trees to be removed on site: $52/84 = 62\%$

The subject property is approximately 4.12 acres and therefore a minimum of 12 trees are required for retention. The proposal includes retention of 32 trees total, meeting this requirement. Some proposed construction is within the retained trees drip lines; however, tree protection fencing is indicated on the plans.

The proposal includes removal of three landmark oak trees, which does not meet the required retention specified in this section requiring a tree retention modification request. However, the applicant has planted 72 Gerry Oaks to compensate for the removal of these trees.

c. DMC 25.120.040 Oak management mapping units.

DuPont contains several Oregon white oak stands, some of which have been mapped, and include special regulations specified under this section.

Staff Analysis and Conclusion: The subject property does not contain any of the mapped oak units, therefore this section is not applicable.

d. DMC 25.120.050 Modifications.

Under this section, any landowner can request a modification from the provisions of this chapter based on special circumstances pertaining to the land. Per this section, tree retention modification requests will be reviewed based on DMC 25.120.010 Purpose.

Staff Analysis and Conclusion: The applicant is not meeting the requirements of this chapter and accordingly submitted a tree modification request, which will be processed as a Type III permit application as specified in this section.

The proposed tree retention plan, arborist report, and modification request was peer reviewed by Sound Urban Forestry and were found to meet the purpose and intent of this chapter as stated under DMC 25.120.010:

(1) The purposed of this chapter is to:

- (a) Protect natural habitats, air quality, and ground water recharge;*
- (b) Improve the appearance of the community;*
- (c) Provide shade and wind protection;*
- (d) Reduce stormwater discharge; and*
- (e) Conserve water supplies.*

(2) This chapter is intended to help achieve these purposes by:

- (a) Retaining trees, without reducing developmental densities from those indicated in the comprehensive plan.*

In summary, the request protects an existing stand of native Oregon oak trees by constructing the building around the tree area, thus avoiding their removal and by planting native understory vegetation to support the oaks. The request will result in removal of invasive plants infesting the oak grove, replacing it with native plants, improving the site's appearance. Additionally, 72 new Gerry Oaks will be planted throughout the site, further improving the site's appearance and providing shade and wind protection.

In conclusion, the proposed tree retention modification meets the purpose and intent of this chapter as specified under DMC 25.120.010 and approval is recommended with the following conditions (included as Conditions 7 and 8 in Section D, Recommendation):

- 1. The irrigation plans as part of the landscape plans, Sheet IR1.1 present lateral lines and Hunter MP rotator spray heads being installed within the protection areas of the landmark and significant trees. No trenching or underground installation of lateral lines, spray heads or any other irrigation hardware should be allowed within those areas. All trenching and/or digging shall be prohibited within identified tree protection areas. Additionally, no equipment should be allowed within these areas. Irrigation lines or heads can be placed above ground and all spray heads shall be installed so that they do not spray any water against the trunks of any retained oaks. The irrigation notes on Sheet IR1.3 should clearly state these guidelines.*
- 2. Per DMC 25.120.030 (7) all trees retained by means of this chapter shall remain protected for their life. The plat or site plan on which the tree is located shall contain the following note: "This plat is also subject to an approved tree retention plan which requires that certain trees be preserved. That plan, which is binding on all owners, is on file with the City Planning Department." To further inform future lot owners, a copy of the approved tree retention plan shall be provided each owner at closing on each lot.*

4. DESIGN REVIEW

a. DMC Chapter 25.70 Commercial and Mixed Use Design Regulations and Guidelines

This chapter applies to all new development projects requiring site plan approval.

b. DMC 25.70.020. Site Design. The application was reviewed in accordance with the requirements of this section.

Analysis: Both project buildings are attractively designed with a unified, contemporary theme based on concrete wall panels painted blue, brown, and grey. The street-facing walls are articulated with recessed and projecting planes, as well as large windows and a defined primary entry. Safe pedestrian access is provided by adjacent public sidewalks connected internal sidewalks along the building leading to entry and pedestrian plaza areas. Auto and truck access are provided by a separate network of driveways and drive aisles serving parking areas for both the church and commercial building. The site plan is designed in a manner that allows phasing.

The proposed church building and commercial building would be developed in a coordinated manner by situating them adjacent to the street with street-facing entries and substantial glazing. The buildings are of similar style, employing concrete panels with reveal lines, and wall plane recesses and projections. A dedicated and continuous network of sidewalks is provided both on- and off-site. Parking areas include substantial planters defining distinct areas and avoiding long uninterrupted rows of parking. Parking areas are screened from adjacent streets by landscaping planters and trees.

c. DMC 25.70.030 Parking Areas. The application was reviewed in accordance with the requirements of this section.

Analysis: The majority of the proposed parking is located at the rear of the church and commercial building, screened from view from the street. Where parking is located along the street, it is visually buffered by ten-foot-wide planters with shrubs and trees. Adjacent to and within the parking areas, a ratio of approximately one tree is provided for each two parking spaces. Parking rows consist of no more than 12 abutting stalls, separated by a minimum eight-foot-wide planter, and parking rows are capped by six-foot-wide planters. All landscape

areas are proposed to be planted with a dense pattern of trees and shrubs. A condition of approval (Condition 5) is included requiring the specific planting densities and height of Section 25.70.030(2) be shown on the landscape construction drawings, prior to issuance of building permits.

Five-foot-wide pedestrian pathways from the parking areas to the building sidewalks are provided, and crosswalks are provided at parking lot entries and exists. A condition of approval (Condition 4) is included requiring a lighting plan with details listed in Section 25.70.070(12), prior to issuance of building permits.

- d. **DMC 25.70.060 Public Areas and Landscaping.** The application was reviewed in accordance with the requirements of this section.

Analysis: The project contains no commercial public plazas; therefore, the public area landscape provisions of this code section do not apply. The streetscape provisions of this section do apply to the project. This section is similar to the street tree requirements in DMC 24.90.030(1), which require spacing at 40 to 50 feet. Per DMC 25.05.040(3), the stricter requirements to plant street trees at no more than 30 feet on center of DMC 25.07.060 apply. The new street trees proposed along DuPont–Steilacoom Road are show on the plants to be planted at greater than 30 feet on center; therefore, a condition of approval (Condition 8) is included requiring the plans be revised to show compliance with this section. Existing street trees along Barksdale Avenue are proposed to remain in place except for one tree proposed to be removed for the required driveway, and one dead tree proposed to be removed. All of these existing trees are spaced at 30 feet or less on center. To maintain this spacing, the above condition of approval also requires the dead tree proposed for removal to be replaced with a new tree.

- e. **DMC 25.70.070 Architectural Building Character.** The application was reviewed in accordance with the requirements of this section.

Analysis: The proposed buildings are of similar style and character, incorporating concrete panels with recesses and reveal lines, with wall plane recesses and projections. Regarding surrounding context, the buildings are similar to the hotel across Steilacoom-DuPont Road in that they include a rectilinear form, flat roofs, recesses and projections in wall plane, and of concrete finishes. Horizontal accent bands are also common to both buildings, as well as vertically oriented windows. Both the project buildings and the hotel are situated at the street frontage. While of a different form an orientation to the gas station building across Barksdale Road, both buildings include vertical glazing, concrete finishes, and flat roofs, similar to the gas station building, and are therefore compatible in appearance.

C. CONCLUSION

1. **Site Plan Review.** The proposal was reviewed for consistency with the zoning district requirements, general development requirements, and the 2015 DuPont Comprehensive Plan, analysis for which is included under section B.1 of this staff report. The site plan and associated materials are found to meet the site plan approval criteria specified under DMC 25.150.030.
2. **Critical Areas Permit.** The proposal was reviewed for consistency with DMC Chapter 25.105, analysis for which is included under section B.2 of this staff report. The plans and reports prepared for the proposal are found to meet the critical areas permit approval criteria specified under DMC 25.105.080 (4).
3. **Tree Retention Modification Request.** The proposal was reviewed for consistency with DMC Chapter 25.120, analysis for which is included under section B.3 of this staff report. The request

is found to be consistent with DMC 25.120.010 as required for tree modification approval as specified under DMC 25.120.050.

4. Design Review. The proposal was reviewed for consistency with the commercial and mixed use design regulations and guidelines, the analysis for which is included under section B.4 of this staff report. The site plan, building elevations, and associated materials are found to meet the design regulations and guidelines in DMC Chapter 25.50.

D. RECOMMENDATION

Based on the findings and conclusions in this report, City staff recommends approval of the following applications:

- [Type I – Design Review \(PLNG2023-010\)](#)
- [Type II - Site Plan Review \(PLNG2023-010\)](#)
- [Type III - Critical Areas Permit \(PLNG 2023-014\)](#)
- [Type III - Tree Modification \(PLNG2023-011\)](#)

The following conditions apply:

1. The proposal shall be consistent with the Findings and comply with the Mitigation Measures provided in the SEPA Mitigated Determination of Nonsignificance dated October 20, 2025.
2. Prior to issuance of building or grading permits, a Boundary Line Adjustment shall be approved and recorded, including perfection and recording of easements shown thereon, consistent with the conceptual lot lines shown on the project site plan.
3. The refuse enclosures shall be constructed and painted to match the walls of the proposed buildings, and shall include solid, closeable gates.
4. Lighting plan details meeting the requirements of Section 25.70.070(12) shall be submitted for review and approval prior to issuance of building permits.
5. Calculations shall be provided on the landscape plan construction drawings demonstrating compliance with Section 205.70.30 (2).
6. Prior to issuance of grading and building permits, the project plans shall be revised to indicate all street trees to be planted no greater than 30 feet on center, in accordance with DMC 25.07.060. Additionally, the existing dead tree shown to be removed along Barksdale Avenue shall be replaced with a new tree in order to maintain the required 30 feet on center spacing.
7. The irrigation plans as part of the landscape plans, Sheet IR1.1 present lateral lines and Hunter MP rotator spray heads being installed within the protection areas of the landmark and significant trees. No trenching or underground installation of lateral lines, spray heads or any other irrigation hardware should be allowed within those areas. All trenching and/or digging shall be prohibited within identified tree protection areas. Additionally, no equipment should be allowed within these areas. Irrigation lines or heads can be placed above ground and all spray heads shall be installed so that they do not spray any water against the trunks of any retained oaks. The irrigation notes on Sheet IR1.3 must clearly state these guidelines.
8. The project shall adhere to the inadvertent discovery plan protocols included in the project cultural resource assessment (Drayton Archaeology, August 15, 2023.) In addition, in accordance with the Memorandum of Agreement (MOA) dated August 7, 1989, executed between Weyerhaeuser Real Estate Company (WRECO) (the previous landowner), the City of DuPont, and the Washington State Historic Preservation Officer regarding the discovery of cultural resources within the City of DuPont, archaeological monitoring during soil disturbing activities, shall be required, including extending an invitation to the Nisqually Tribe to be present during such activities, and preparation of a closing report.

9. Tree protection measures shall be implemented as specified on the landscape plans prepared by ARW Landscape Design dated August 1, 2025.
10. Per DMC 25.120.030 (7) all trees retained by means of this chapter shall remain protected for their life. The plat or site plan on which the tree is located shall contain the following note: "This plat is also subject to an approved tree retention plan which requires that certain trees be preserved. That plan, which is binding on all owners, is on file with the City Planning Department." To further inform future lot owners, a copy of the approved tree retention plan shall be provided each owner at closing on each lot.
11. The Wetland Buffer Mitigation Plan prepared by Grette Associates dated August 2025 shall be implemented.
12. The Habitat Management Plan prepared by Grette Associates dated August 2025 shall be implemented.
13. Prior to issuance of building or grading permits, the permittee shall enter into an agreement with the city to be responsible for implementing the Buffer Mitigation Plan and Habitat Management Plan, for a period of five years. The year during which construction of the site is completed (including buffer plant installation) will be year 0. The applicant shall bond with the city for the maintenance of said plantings for a five-year period.
- ~~13.~~14. Parcel C shall be conveyed to the city only after mitigation plantings have been installed in accordance with the Buffer Mitigation Plan and Habitat Management Plan, subject to approved by the City. An easement shall be granted by the city to the owners of Parcel A and B to allow access and maintenance of the plantings.
15. The site shall be developed in accordance with the civil engineering plans listed in Summary of Records Exhibits 2 (b), (d), (e), (n), (o), (p), as modified by the revisions made in accordance with Summary of Record Exhibit 2(u), subject to the following conditions:
 - a. A temporary erosion and sedimentation control plan (TESC) shall be prepared for the project, for review and approval, prior to issuance of grading and building permits. The TESC shall include the Erosion/Sedimentation Control Notes and Construction Sequence listed in the City Standards 11.2,
 - b. Profiles for water, storm, and sewer systems shall be included in the plan check drawings for the project
 - c. Design and sizing of the Level (Flow) Spreader (V-1.4.2 of the Stormwater Manual) shall be addressed in the Final Engineering Storm Drainage Report and Plan Submittal.
 - d. The overflow route for Infiltration Trench B shall be addressed within the Final Engineering Storm Drainage Report in the plan check drawings for the project.
16. Public Works Variances from City Standards 3.1.2.1, 3.1.1.1 (driveways), 3.23.2 (frontage improvements), and City of DuPont Drawing No. 2.4-2.1 (roadway widening) shall be obtained prior to issuance of grading or building permits.

E. SUMMARY OF RECORD

1. The following materials were submitted for all permit applications associated with the subject proposal:
 - a. Title Report provided by Fidelity National Title Insurance dated December 11, 2023
 - b. SEPA Environmental Checklist signed and dated November 25, 2024
 - c. Agent Authorization Affidavit for Wendy Garrison signed and notarized on March 1, 2023

- d. Agent Authorization Affidavit for Champions Centre signed and notarized on March 6, 2023
- 2. The following materials were submitted specifically for site development review:
 - a. Land Use Application signed and dated October 2, 2023
 - b. Site Plan prepared by LeRoy Surveyors & Engineers dated July 18, 2025
 - c. Existing Conditions Plan prepared by LeRoy Surveyors & Engineers dated December 9, 2024
 - d. Grading Plan prepared by LeRoy Surveyors & Engineers dated July 18, 2025
 - e. Stormwater and Utilities Plan prepared by LeRoy Surveyors & Engineers dated July 18, 2025
 - f. Drainage Report prepared by LeRoy Surveyors & Engineers dated September 22, 2023
 - g. Maintenance and Source Control Manual prepared by LeRoy Surveyors & Engineers dated September 2023.
 - h. Stormwater Pollution Prevention Plan prepared by LeRoy Surveyors & Engineers dated September 2023
 - i. Landscape Plan prepared by ARW Landscape Design dated August 1, 2025
 - j. Arborist Consultant Memo prepared by Greenforest dated December 4, 2023
 - k. Architectural Elevations prepared by Elevation Home Designs dated November 15, 2023
 - l. Lighting Plan prepared by Tres West Engineers dated November 19, 2024
 - m. Parking Plan Exhibit prepared by LeRoy Surveyors & Engineers dated July 18, 2025
 - n. Fire Truck Exhibit prepared by LeRoy Surveyors & Engineers dated July 18, 2025
 - o. Entering Sight Distance Exhibit prepared by LeRoy Surveyors & Engineers dated April 17, 2025
 - p. Stopping Sight Distance Exhibit prepared by LeRoy Surveyors & Engineers dated April 16, 2025
 - q. Refuse Enclosure Exhibit prepared by LeRoy Surveyors & Engineers and signed October 31, 2023
 - r. Traffic Impact Analysis Report prepared by Heath & Associates dated September 1, 2023.
 - s. Letter of Water Availability
 - t. Letter of Sewer Availability
 - u. Response letter to March 5, 2025 Request for Revisions, dated April 23, 2025
- 3. The following materials were submitted specifically for the critical areas and tree modification permits:
 - a. Tree Modification Request Letter prepared by LeRoy Surveyors & Engineers dated December 20, 2023
 - b. Biologist Memo prepared by Grette Associates dated December 4, 2023
 - c. Arborist Report prepared by Greenforest revised January 29, 2025
 - d. Tree Retention Plan prepared by LeRoy Surveyors & Engineers dated July 18, 2025
 - e. Critical Area Report prepared by Grette Associates revised May 2024
 - f. Geotechnical Report prepared by LeRoy Surveyors & Engineers dated October 14, 2024

- g. Cultural Resources Study prepared by Drayton Archaeology dated August 15, 2023
 - h. Buffer Mitigation Plan prepared by Grette Associates dated August 5, 2025
 - i. Habitat Management Plan prepared by Grette Associates dated August 5, 2025
4. The following notices were issued by the City during application review:
- a. Notice of Complete Application dated January 16, 2024
 - b. Notice of Application & Optional DNS dated January 19, 2024.
 - c. Notice of Public Hearing, issued October 28, 2025
 - d. Notice of Decision to Issue a Mitigated Determination of Nonsignificance, dated October 20, 2025
5. The following comments were received on the application:
- 1. Emily Griffith, Northwest Landing Owners Association, February 2, 2024
 - 2. Brad Beach, Nisqually Indian Tribe, January 30, 2024
- a. The following parties provided comments in general support of the proposal:
- 1. Eddie Anderson, January 29, 2024
 - 2. Hunter Bungert, January 22, 2024
 - 3. Tristan J. Ellingsworth, January 29, 2024
 - 4. Tammie Pitzler, January 22, 2024
 - 5. Amber Blair, January 21, 2024
 - 6. Dustin Blair, January 21, 2024
 - 7. Valerie Marmolejo, January 22, 2024
 - 8. Kevin Torg, January 31, 2024
 - 9. Nikki Macias, February 1, 2024
 - 10. Chaise Music, January 28, 2024
 - 11. Isabel Olds, January 30, 2024
 - 12. Dan Otchere, January 28, 2024
 - 13. Isaac and Jaime Paulson, January 28, 2024
 - 14. Loujanna Rohrer, February 3, 2024
 - 15. Sandon McCoy, January 30, 2024
 - 16. Tashara Smith, January 23, 2024
 - 17. Monet Thompson, January 28, 2024
 - 18. Sherrell Young, January 28, 2024
 - 19. Mary Zepeda, January 28, 2024
 - 20. Don Zimmerman, February 1, 2024
- b. The following parties provided comments of general opposition or concern for the proposal:
- 1. Chrystal Patterson, February 2, 2024

2. Sean Arent, February 2, 2024
 3. Chris Barnes, February 2, 2024
 4. Karen Burch, February 2, 2024
 5. Kathleen Trotter and Ruth Egger, February 2, 2024
 6. Beth Elliot, February 2, 2024
 7. Jessica Fester, February 2, 2024
 8. Asa and Candice Frederick, February 2, 2024
 9. Maria Gudaitis, February 2, 2024
 10. Judy Norris, February 2, 2024
 11. Bridget King, February 2, 2024
 12. Nicole McNeil, February 2, 2024
 13. Karen Nolan, February 2, 2024
 14. Krista Novak, February 2, 2024
 15. Krystal Richards, February 2, 2024
 16. Alicia Roubicek, February 2, 2024
 17. Michelle Ryder, February 2, 2024
 18. Portland Williams, February 2, 2024
6. The following comments were provided on the proposal by City staff and consultants:
- a. Department of Ecology comment, dated January 22, 2024
 - b. City Traffic Engineer review of Champions Centre Development, Dated February 20, 2024
 - c. Building and Fire Department Comments, dated February 21, 2024
 - d. City Engineer Review of Land Use Application, dated February 22, 2024
 - e. Peer Review of Type III Tree Modification Request, Dated March 11, 2024
 - f. Peer Review of Champions Center Development Critical Areas, dated April 16, 2024
 - g. Request for Revisions, dated April 19, 2024
 - h. Peer Review of Champions Centre Development Critical Areas, dated January 26, 2025
 - i. Building Department review of resubmitted plans, dated January 29, 2025
 - j. Fire Department review of resubmitted plans, dated January 31, 2025
 - k. Peer Review of resubmitted Type III Modification Request, dated February 17, 2025
 - l. Request for Revisions, dated March 5, 2025
 - m. City Engineer review of site distance analysis, dated February 28, 2025
 - n. Transportation Concurrency, Dated June 17, 2025
 - o. Peer Review email of revisions to HMP, dated August 7, 2025
 - p. Peer Review email of revisions to HMP, dated October 30, 2025

F. PARTIES OF RECORD

Wendy Garrison

David Yadon

All parties listed in Section E Above.

cc: File No. PLNG2023-010,-011,-012,-013,-014

Applicant: Wendy Garrison, LeRoy Surveyors and Engineers

City of DuPont: Patrick Kelly, AHBL, Inc., Land Use Consultant to the City

Geralyn Reinart, PE, Traffic Consultant to the City