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September 12, 2018

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Comments Regarding the Proposed Determination of Non-Significance for the Construction of an Industrial Park on Historic Properties Next to Sequelitchew Creek (City File Nos. PLNG 2018-008, -009 and -047)

Mr. Wilson,

Please consider the comments below regarding the proposal for a large industrial park on historic property next to Sequelitchew Creek and the Sequelitchew Creek Trail, submitted on behalf of the Nisqually Delta Association (“NDA”). NDA is a volunteer, community organization dedicated to preservation of the natural and cultural resources of the Nisqually Delta and its surrounding environment, which includes the City of DuPont.

The SEPA checklist and associated documents are deficient in that they do not adequately disclose many significant impacts, including impacts to the historic sites on the property and the potential to form a long-sought historic district, as well as water quality impacts to Sequelitchew Creek. The impacts and mitigation of this significant project appear to be largely unknown and delayed for later consideration. A project of this scope and uncertainty is inappropriate for the optional DNS process.

To the extent the impacts are discernible from the SEPA checklist, they demonstrate probable significant adverse environmental effects. An EIS is required and is important to allow for full consideration of impacts to important public resources. RCW 43.21C.031. The proposal

would create significant effects, including more than 50,000 cubic yards of cutting and filling of soils likely containing historical artifacts, major road construction, paving or building on approximately 15 acres of currently undeveloped land, moving historical markers and destroying historical sites, destruction of a rare landmark white oak tree, greatly increased traffic, and changes to a popular recreational trail. As presented, the proposal contradicts the City's long-term vision set forth in the 2015 Comprehensive Plan, which is to develop Sequelitchew Village for residential use and to protect natural and historic features in public parks. The proposal is particularly significant given the precedential impacts, which would severely undermine development of a proposed historic district on the same site, the vision set forth in the City's Comprehensive Plan, and legally-required stream restoration efforts in Sequelitchew Creek. Indeed, the Department of Ecology and prior landowners have recognized "the historical and archaeological significance of the Site" in a binding legal agreement. *See* 1991 Settlement Agreement, Part V, subpart G.

If the City does not require an EIS at this time, NDA requests that the City at a minimum allow additional comment once the impacts and mitigation are determined, such that the public may have an opportunity to provide public comment on a fully-developed project.

The SEPA threshold determination hinges on consideration of the context and intensity of the likely impacts. Accordingly, this letter proceeds by providing context and history of the site of the proposal and NDA's involvement in its protection. The letter then details inadequacies in the SEPA Checklist and attached Parus Report, and then explains why a Determination of Significance and an additional comment period are warranted.

Context of the Proposal

The proposed development site consists of approximately 21 acres located on the north side of Sequelitchew Creek. The site and its surroundings have had special significance since time immemorial. Ancestors of the Nisqually and Puyallup Tribes camped at the mouth of the creek for thousands of years, and Sequelitchew Creek was used for fishing and an important trading site.

As described in the Tacoma News Tribune (see article in submitted materials), British traders landed in the area in 1832 and established what became known as Nisqually House near the beach. By 1833, the Hudson's Bay Co. built a first Fort Nisqually on a hillside on the south side of Sequelitchew Creek and were regularly moving supplies overland to and from the Columbia River, overland with oxen to prairies above Sequelitchew Canyon, and onto boats traveling up the Salish Sea and into present day Alaska, where they were engaged in the fur trade.

Americans arrived in 1839 to open a Methodist-Episcopal mission, (a.k.a.: the Nisqually Mission), on the north side of the creek as part of an effort to strengthen territorial claims. The

mission was located on what is currently proposed for construction and paving in “Lot Y.” The mission, which the U.S. government sanctioned and supported, marked the first permanent American settlement on Puget Sound and the first religious institution on Puget Sound. The site featured a remarkable series of “firsts,” witnessing the arrival of the first U.S. settlers in Western Washington, the establishment of the first school for Native American and Euro-American children in the region, the first marriage of U.S. citizens west of the Cascades, the first birth of a child to U.S. citizens, and the first Protestant mission to be established in Western Washington.

In 1841, a U.S. Navy expedition landed in the area. Accounts of expedition leader Charles Wilkes indicate he made crucial observations from a nearby hillside point overlooking the water. That same year, Wilkes' party and settlers from the mission held the first known celebration in the area marking the anniversary of U.S. independence.

In 1904, a roughly 2,000-member contingent of the 9th U.S. Cavalry, known colloquially as the “Buffalo Soldiers,” camped in the area, built stables and other infrastructure, and carried out war games. This area was known as “Camp Nisqually.” From 1927-1976, the DuPont Powder Works was located on the site.

These sites collectively comprise an integral piece of Washington history, which have been subject to ongoing archaeological and historical research. The Nisqually Mission and Buffalo Soldier Encampment are both recognized as eligible for the National Register for Historic Places, and the surrounding area has been nominated and considered as a potential historic district.

In more recent history, the area has been the subject of land use disputes, resulting in settlements of which the Nisqually Delta Association has been a party. A 1994 settlement (detailed further below) helped settle a long dispute over the shoreline use and led to the creation and enhancement of the Sequelitchew Creek Trail, which is now a very popular, family-friendly trail that draws visitors from afar to the City of DuPont. According to the Washington Trails Association, the creek and trail are “a fantastic find in the middle of DuPont,” and the trail receives frequent enthusiastic visitors.¹ A 2011 settlement sets out an ambitious restoration plan for Sequelitchew Creek, which could one day result in restored flows and habitat conditions that could restore lost salmon runs. A free flowing Sequelitchew Creek would itself be a centerpiece of a Nisqually-Sequelitchew National Historic District.

NDA and Site Background

The Nisqually Delta Association came into being nearly 50 years ago, when concerned citizens learned of a City of Seattle plan to place a landfill on what today is a National Wildlife Refuge. Later the Atlas Powder site in Thurston County was proposed as a new private port. A

¹ See <https://www.wta.org/go-hiking/hikes/dupont-sequalitchew-creek>.

popular uprising amongst the citizens of Thurston County helped propel the Thurston County Commissioners to shut that proposal down, in the interest of protecting the environmental values of the Nisqually Reach.

Concerned citizens and members of the Nisqually Delta Association went on to promote statewide shoreline regulation and NDA members helped craft and pass Washington's Shoreline Management Act (SMA). As might be expected, all of Nisqually Reach, from DeWolfe Bight, Thurston County to Tatsolo Point, Pierce County, was called out in the Shorelines Management Act as one of the only five specifically named, "Shorelines of Statewide Significance" (1971 SMA).

Organized to represent that Statewide interest in protecting the ecological benefits of the Nisqually Delta, the Association did political advocacy to gain a federal designation of the Nisqually as a National Wildlife Refuge. Seeking to enforce the protections afforded to a Shoreline of Statewide Significance, the Nisqually Delta Association came into a conflict with the private investment proponent of a new, private super-port, initially envisioned as a vertically integrated timber products industrial complex, complete with a world class dock capable of servicing three 600' ocean going freighters at the same time.

The SEPA documents that produced to seek permits for the dock described a huge, T-shaped concrete deck, extending north and south from the center of the Sequelitchew Creek estuary, along what is today City of DuPont shoreline. The Nisqually Delta Association lead a legal challenge to the proposal, objecting to the major industrial development within the sweep of the Shoreline of Statewide Significance, and abutting industrial use directly to ecological preserve designated lands. The proponent argued they were only replacing an earlier dock, and that the impacts would be small — they only intended to export law logs, and had no further plans.

That NDA case, opposing the dock proposal, wound its way through the Shorelines Hearings Board, the lower courts, and eventually made its way all the way to the State Supreme Court. The first time around, the Court was unable to come to a timely decision, and that led to a second Supreme Court review of the contest. In the end, the Supreme Court granted the proponent the right to permit the project but restricted the use of the dock to only those purposes declared in the SEPA analysis.

That legal contest, which started in the late 1970's, and was still simmering into the 1990's, kept the sides engaged until the land owner announced a new plan to build a dock in the same place, but use it to load gravel onto ships. Again, the Nisqually Delta Association raised objections to the proposal to the Shorelines Hearing Board (SHB). This second time around, the SHB remanded the parties to mediate, and a negotiation quickly got under way. Those talks ran all the way through 1994, resulting in a finally executed agreement at the end of 1994. When the Nisqually Delta Association (and a group of allied environmental organizations), signed the 1994

Settlement Agreement with the City of DuPont, the Department of Ecology, the land owner, and the proponent of a new gravel mine, it represented a compromise by all parties. That Settlement Agreement included provisions to:

- Allow construction of a ship loading facility, off of the Shoreline of Statewide Significance, but serving the same upland area;
- Protect the shoreside bluffs along the Puget Sound and Sequatchew Creek, and protect the natural flow of groundwater into the Nisqually Reach;
- Designate the Sequatchew Creek Canyon as an environmental reserve, to one day serve as a community park;
- Establish an environmental trust fund to help support acquisition of lands that might advance the ecological purposes of the Nisqually National Wildlife Refuge.

While the dispute over the shoreline use was wending its way through the courts, the legacy of explosive manufacture eventually caused much of the land around Sequatchew Creek to be recognized as a Priority Hazardous Waste Cleanup Site. Cleanup work was to be done under the State's authority, as defined by Washington State's Model Toxics Control Act. In its original form, the Model Toxics Control Act had a provision to support communities in implementing Cleanup Action Plans. Those efforts were made possible by small grants to qualifying organizations willing to provide "in-kind" support for the grant efforts.

Nisqually Delta Association received one of the first of these Public Participation Grants (PPGs). Initially it was thought the cleanup effort would take a year or two. In fact, the cleanup effort lasted over a decade, and the NDA sought and received a series of PPG grants. The PPGs were intended to help local citizens engage more effectively in the policy decisions required during contaminated site cleanup planning.

The Nisqually Delta Association supported the Citizens of DuPont through the work of the DuPont Toxics Citizen Oversight Project. The DToxCOPs used grant funds to hire technical reviewers to look over design documents and help explain the implications to the community. Using an open bid process, according to agency-provided accounting standards, the DToxCOPs selected a consultant. The main concern of the DToxCOP was technical excellence in the work, with the end goal of long-term protection of DuPont's community and environment. The cleanup effort initially was so narrowly focused on the environmental risks associated with the cleanup, that cultural resources impacted were not addressed. Notably, the settlement documents expressly "recognize the historical and archaeological significance of the Site." *See* Settlement Agreement, Part V., subpart G.

A couple of incidents dramatically illustrate the risk to cultural resources and the subsequent recognition of the historic importance of the site:

At one time, on a tour of sites with a project manager from the cleanup team, I was shown where the crews had built a new haul road, directly across the 1833 Fort Nisqually footprint, the Hudson Bay Company's first such Fort. The tour guide pointed out where it was possible to discern the line of log ends that witnessed the former colonnade. I immediately noted that driving over a recognized archeological site was likely unlawful. A few weeks later it was announced that the land owner had gifted the site to a third-party preserver of historic sites, who, incidentally, immediately fenced the fort site to guard against further degradation.

On another occasion, citizens of DuPont complained that a decades old monument, made of concrete and bronze, had disappeared. That monument was placed to commemorate the Nisqually Mission: the first American structure on the Puget Sound and site of the First American Wedding, the First American School, and first American Celebration of the Fourth of July. Significant to understanding the political forces at work over the landscape, the Nisqually Mission was intentionally placed north of the Hudson Bay Company's Fort Nisqually (1833), and on the northern shore of the Sequelitchew Creek watershed (the site of the currently proposed project).

The Nisqually Mission Monument was but one of a series of significant memorials constructed to honor historic events occurring along the Sequelitchew Creek. The former land owner developed the monuments to honor and preserve sites of historic significance that shaped the development of this State. At the Nisqually Mission site, they knew to have been identified and marked by a firsthand witness to the Nisqually Mission, the son of the man who bought the site from the Hudson Bay Company after the dissolution of the Puget Sound Agricultural Company (an HBC spin-off). Given the size, shape and weight of the Nisqually Mission Monument, it was clear that it had not be pilfered as a prank. Heavy equipment was required.

As though that disappearance was not enough, the monument had been replaced by a pile of dark soils, which were later understood to be contaminated wastes hauled from other areas of contamination. At the next available Site Remediation Project Management meeting, I informed the land owner that removal of the monument was likely unlawful. The monument had stood on the site for seven decades, and that monument was itself a replacement of an earlier wooden commemoration. The Nisqually Mission Monument was placed in the right place, a long time ago, by people who knew where the building had stood! Relatively quickly, they returned the marker to its rightful place.

About this same time, Ms. Lorraine Overmier, who had been a DuPont community organizer for decades where she had lived most of her married life in the Old DuPont Village, reached out the representatives of the DToxCOPs and suggested that there are enough of those historically significant sites to qualify as a National Historic District. The historic preservationists decided to move forward with two important efforts.

One was the development of a brief petition to the Department of Ecology, noting the recognition of Historically Significant sites, requested the Agency reconsider its planned project work plan, at least so long as the concerns for protection of historic/archeologic/cultural resources were unresolved. Signature gatherers collected several hundred signatures in a couple of weeks and brought them to Department of Ecology Headquarters.

The other important effort was a push for the recognition of an “eligible for listing” National Historic District. Motivated by the threat of “destruction by cleanup,” Ms. Overmeyer and her friends, (notably the Dr. Rev. James Edgren), formed a fledging not-for-profit to promote the cause. They called their organization the “Nisqually Point Defense Fund”, and they went to work on defining what they believed to be appropriately defined National Historic District.

The volunteers of the Nisqually Point Defense Fund, assisted by a few able technicians trained in the art and science of historic preservation, (working pro bono for the cause), put together a reasonably complete and strong nomination to form a new “Nisqually-Sequalitchew National Historic District.” Subsequently that proposal was endorsed by the State Historic Preservation Officer, the present-day Director of the Department of Archaeology and Historic Preservation, Dr. Allyson Brooks. Subsequently the nomination’s worthiness was also endorsed by the Governor’s Historic Advisory Committee, which unanimously endorsed the National Historic District Nomination, in spite of request for denial by the land owner.

Subsequently, an effort was convened to address the interests of historians and archeologists and allow for the long-term establishment of a National Historic District. The City, the Department of Ecology, and the land owner hammered out a deal over a number of months. The land owner objected to the Historic District listing but agreed to implement restrictive covenants into the deeds of property parcels as they were sold, compelling subsequent land owners to accept the Historic District designation. The idea was to set up a situation where eventually, when all (or most) of the development sites were sold, a National Historic District could be established.

The purposes of that 2000 Settlement have not been realized. A rough plan to allow for a historic district, with interconnecting trails, numerous comparative signs and an interpretive center, anchored by the Nisqually Mission site, has been slow to develop but is recognized as a goal in the 2015 Comprehensive Plan. Today, those cultural resources are once again at imminent risk.

Site Background

Inadequacy of the Checklist

The checklist fails to adequately disclose environmental impacts and suggests but does not define mitigation. Based on currently available information, the public cannot possibly adequately assess the impact of the project or propose less impactful alternatives, and there is no

basis upon which the City can reasonably conclude that the impacts to the environment will be non-significant. The bulleted list below details deficiencies in the SEPA Checklist that must be remedied for additional City and public review.

B. Environmental Elements

- 1.e. The checklist details removal and addition of approximately 75,000 cubic yards of fill and stripping material, and states only that there will be an unspecified erosion control plan. This disclosure is insufficient to assess impacts. It also fails to acknowledge that the fill removal will likely remove historical artifacts, and fill addition and subsequent paving is likely to forever obscure any remaining artifacts.
- 3.a.1. The proponent admits that there will be work carried out within 200 feet of Sequalitchew Creek but does not describe the extent or nature of that work as required by the SEPA Checklist. Tree removal, paving, construction and runoff within 200 feet of an already heavily impacted stream is highly likely to create significant impacts to the creek and the canyon, which the City has previously recognized for its environmental and historical significance (for example, in the 1994 Settlement Agreement).
- 3.c.1. The proponent notes that there will be runoff created by the project but fails to quantify the quantity of runoff or detail the impacts created. The checklist mentions, but does not provide, an infiltration system. Given the addition of 15 or more acres of impervious surfaces, 99 parking spaces, additional road length and frequent vehicle traffic, there is likely to be significant stormwater pollution which must be described in much greater detail. The impacts must discuss impacts to Sequalitchew Creek as well as the estuary downstream, which is eligible for inclusion in the Billy Frank Jr. National Wildlife Refuge.
- 3.c.2. The proponent fails to acknowledge that pollutants from runoff are likely to enter surface waters and ground waters, despite elsewhere stating that a National Pollution Discharge Elimination System permit is required.
- 3.c.3. The claim that the project would not alter the current drainage pattern of the area is plainly incorrect given the conversion of undeveloped land to impervious surfaces.
- 4.b. The description of tree removal references an "Arborist Report/Tree Retention Plan" that does not appear to be included with the checklist for public comment. The provision references DuPont Municipal Code but fails to provide or analyze application of potentially applicable ordinances concerning tree

retention on the north side of Sequalitchew Creek (Exhibit A to Ordinance 95-521, page 36, section 9) and for Oregon white oak trees (*see* Ord. 02-707 § 1).

- 5.a. The checklist fails to acknowledge documented presence of coho salmon in Sequalitchew Creek (see WDFW SalmonScape map in included materials) and fails to discuss impacts to aquatic species from runoff and development near the creek. The discussion should include impacts on the restoration project, which is a required condition of the 2011 settlement agreement.
- 5.d. The only mitigation provided for wildlife impacts is a “landscaping plan,” with no details provided. This is insufficient to assess impacts.
- 7.b.2. The checklist divulges that “on a long term basis” there will be noise from vehicular traffic “24 hours a day/7 days a week.” The Checklist should provide far greater information regarding the nature of the traffic and the project generally. As written, it is impossible to assess the significance of the impacts. For example, if the warehouses are intended as a trucking distribution center, regular truck traffic throughout the night and associated light, air, and sound pollution would have a significant impact to nearby residents. Please note that elsewhere in the checklist, the proponent projects “**444 total daily trips**,” with “43 trips expected during the AM peak hour and 49 trips during the PM peak hour.” *See* checklist 14.f (emphasis added). This large number of trips (for 90 anticipated employees), focused on off-peak hours, strongly suggests that the warehouses are intended for some sort of distribution center and that there will be significant, ongoing noise impacts.
- 8.c.1. The checklist states that the project is compatible with existing and projected land uses and plans. This statement appears to be incorrect, as the proposal is inconsistent with the approved Comprehensive Plan’s designation of the site as part of the Sequalitchew Village Planning Area. That Area is envisioned for long-term use residential use, with set-asides for historical and natural preservation. The Comprehensive Plan reads in part: “Any future development located adjacent to Sequalitchew Creek, or its associated nature trail must be done with significant care to protect and preserve the full length of the Sequalitchew Creek Trail in a natural and uninterrupted state.... In addition to trails that will connect this village with other neighborhoods, a seven to ten-acre community urban design feature is located within this area, just north of Sequalitchew Creek and west of Center Drive in the vicinity of the historic 1838 Nisqually Mission site. The intent of this feature is to emphasize and preserve historic elements through the development of

a community focal point involving water, nature, and linkage between Sequelitchew Village and the villages south of the creek.”²

The proposed development of large parking lots and industrial warehouses is inconsistent with and undermines the long-term plan for Sequelitchew Village, and those impacts must be disclosed in the checklist.

- 12.b. The checklist claims lack of impact to recreational uses. In fact, it will significantly impact use of the Sequelitchew Creek Trail. Instead of undeveloped, open property, hikers will view construction and eventually parking lots and warehouses. This will significantly decrease recreational value. Construction is also likely to alter the trail and associated access.
- 12.c. The checklist describes a potential public park, which appears to be the main mitigation feature provided. However, there is no description of the size or features of the park. It is impossible to assess the adequacy of the mitigation from the checklist.
- 13.a. The claim that there are no structures on the site or areas determined to be eligible for preservation is false. The marker for the Nisqually Mission is on the site, and the site is also the location of Camp Nisqually, (9th U.S. Cavalry Bivouac Site).
- 13.b. The checklist claims, based on one paid study by Parus Consulting which appears to have been conducted for a separate project, that there is “no evidence” of the Nisqually Mission (Methodist Episcopal Missions Site) or Camp Nisqually (9th U.S. Cavalry Bivouac Site). The referenced study is insufficient to conclude that there is a lack of significant adverse environmental effects for several reasons.

First, the Parus Consulting report contradicts the already accepted eligibility of the two sites as eligible for the National Register of Historic Places and fails to acknowledge extensive evidence (such as the longstanding location of the site marker for the mission on the property, based on first-hand accounts) indicating that the historically significant events took place on the site proposed for development. Numerous previous studies by independent researchers have chronicled the site’s importance. Moreover, the site itself is significant whether artifacts remain or not. As the location of momentous events in Washington it is an “area of cultural importance” under SEPA.

² See 2015 approved City of Dupont Comprehensive Plan, page 61.

The checklist must further disclose the preclusive impacts of the proposal, which include forever covering historical artifacts, changing the surrounding viewshed, and eliminating the possibility of a proposed historic district. Furthermore, in making the threshold determination the City may not take the Parus Consulting report at face value, but rather must conduct an independent analysis taking into account the extensive evidence detailing the significance of the site. WAC 197-11-330(1)(a)(i).

In sum, the checklist repeatedly fails to disclose the information necessary to adequately assess environmental impacts. References to mitigation, such as a stormwater runoff system and a public park, are cursory and do not allow for a reasoned determination of non-significance. As discussed below, the City should either make a determination of significance based on knowledge of the site or require further public comment and make a threshold determination based on a completed application.

A Determination of Significance is Warranted

SEPA requires preparation of an EIS for projects with “probable significant, adverse environmental impact.” RCW 43.21c.031(1). Per Department of Ecology regulations:

- (1) "Significant" as used in SEPA means a reasonable likelihood of more than a moderate adverse impact on environmental quality.
- (2) Significance involves context and intensity (WAC 197-11-330) and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact.

The referenced threshold determination regulation, WAC 197-11-330, details the process by which a lead agency must determine significance. Of particular pertinence here, the regulation notes that “[t]he same proposal may have a significant adverse impact in one location but not in another location,” “[s]everal marginal impacts when considered together may result in a significant adverse impact,” and a proposal may be significant where it “[a]dversely affect[s] environmentally sensitive or special areas, such as loss or destruction of historic, scientific, and cultural resources...” or “[e]stablish[es] a precedent for future actions with significant effects.” WAC 197-11-330(3). Where an agency is unsure of potential impacts, it may delay consideration pending independent analysis or provision of additional information by the project proponent. WAC 197-11-335.

Here, although the project is poorly defined, there is sufficient information to make a determination of significance. The proposal would excavate, fill, and pave 70-75% of the 21-acre area, and in the process largely eliminate access to over 150 years of Washington history. It would impact an important recreational trail and corridor and undermine the Comprehensive Plan’s vision of residential development with associated park land and preservation of natural

and historical features. The traffic impacts—444 trips every day, 24 hours a day, seven days a week—would disrupt nearby housing and operations at City Hall.

Perhaps most concerning is the long-term precedential impact of the project. The industrial use will at the least undermine, if not preclude, a broadly-held desire to protect and enhance the City of DuPont's unique natural and historical resources. Local non-profits, citizens, and the City have spent decades seeking to restore and revive the City's legacy by returning robust salmon runs to Sequelitchew Creek, protecting and enhancing water quality, and developing an attractive historic district. The proposal is significant in its likely capacity to greatly undermine that vision and establish a precedent for industrial use.

Given the great public importance of the site and its value to the City's long-term plans, an EIS is not only required by SEPA but would be highly beneficial. For example, an EIS could develop an alternative in which the Nisqually Mission marker and landmark Oregon white oak are retained, and reconfigure the proposed park so it accommodates cultural and historic values. If a public park is being formed, the public should have a real and meaningful opportunity to evaluate the best size and configuration.

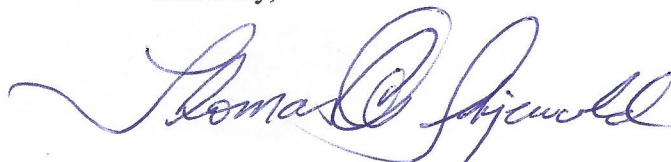
An Additional Comment Period Based on the Final Proposal is Warranted

The checklist makes abundantly clear that the proposal is only partially developed and likely to change. At this point, the proposal and associated mitigation are so uncertain that it is impossible for the public to assess whether mitigation will be adequate to render impacts non-significant, and the City cannot comply with SEPA's mandate to consider environmental impacts before reaching a decision. In particular, the public must be able to review and comment on the planned public park, the proposed stormwater runoff system, the tree permit application and the actual likely traffic patterns and have more information about the proposed use of the property.

The optional DNS process is ill-suited to this proposal because it forecloses public comment on the actual environmental impacts. Pursuant to WAC 197-11-355(4)(d), NDA requests that the City delay making a threshold determination and allow public comment on the final proposal, complete with associated studies and permits and responses to the deficiencies identified in this letter.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Skjervold", with a stylized flourish at the end.

Tom Skjervold, President

Nisqually Delta Association