



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

ENVIRONMENTAL & TECHNICAL SERVICES DIVISION

911 NE 11th Avenue - Room 620

PORTLAND, OREGON 97232

503/230-5400 FAX 503/230-5435

F/NW03:507

FEB 4 1992

RECEIVED

FEB 6 - 1992

CITY OF DUPONT

City of DuPont
Post Office Box 455
DuPont, Washington 98327

Re: Draft Environmental Impact Statement - Pioneer Aggregates
Mining Facility and Reclamation Plan

Dear Sir or Madam:

Thank you for providing this office with a copy of your Draft Environmental Impact Statement for Pioneer Aggregates mining facility and reclamation plan (DEIS).

The National Marine Fisheries Service (NMFS) has responsibilities pertaining to the protection and enhancement of marine, estuarine, and anadromous fishery resources and their supporting habitats. Based on our review of this document, NMFS has several concerns about the proposed bridge site. These include the following.

Marine Waters and Facilities:

- Piling removal and replacement, and construction of the conveyor systems should not be done between March 15 and June 15, to avoid impacts to outmigrating juvenile salmonids.
- Pilings and other in-water structures should not be treated with creosote to avoid possible contamination impacts.
- Measures must be installed at the loading dock to prevent gravel spillage. This is a condition required by NMFS for issuance of Lone Star Northwest's (proponent of Pioneer Aggregates) Army Corps of Engineers permit, OYB-1-013471, to construct pier modifications, dolphins, a conveyor, and install a mooring buoy for loading gravel and barge moorage at this site.
- The conveyor must be enclosed to prevent any gravel spillage into the eelgrass areas. This is a condition for issuance of permit, OYB-1-013471.



- An apron should be placed underneath the conveyance system to catch fine material (DEIS, page 97). Removal of the accumulated fine material from the apron must be done to avoid losses of this material into the marine ecosystem, which could impact the existing eelgrass in the area.
- The selected location of the barge staging area should be the preferred alternative site, 1,400 feet offshore, since no eelgrass beds or other intertidal habitat would be impacted.
- Before a determination is made to redistribute the salvaged sand and gravel lost from barges in the benthic habitat (DEIS, page 145), in-depth studies would be needed to determine the habitat values lost and the benefit of the proposed new, created habitat. Increased structural diversity and subsequent floral and faunal diversity do not preclude adverse impacts to the existing benthic habitat.

Freshwater:

- Stormwater runoff from road surfaces must go through biofiltration prior to entering Sequelitchew Creek.
- During the replacement of the railroad track with a road, measures should be taken to ensure that no increased sedimentation and turbidity occurs in Sequelitchew Creek.
- Measures should be taken to ensure that the removal of the forest growth on the project site does not adversely affect Sequelitchew Creek by increasing sedimentation, erosion, or turbidity, and by decreasing flow in the creek.

Groundwater:

- The processing plant should be located to minimize possible groundwater contamination, which could impact Sequelitchew Creek or the waters of Nisqually Reach. NMFS recommends the selection of Option 1, siting northwest of the northeast corner of the lease area (DEIS, page 98).
- Measures should be taken to ensure that leachate from Fort Lewis Landfill No. 5, which influences the groundwater quality of the Vashon Drift Aquifer, does not reach Sequelitchew Creek from the truncation of the Kitsap Aquitard. This could occur due to changes in groundwater flows caused by the project, particularly since the groundwater flow in the Vashon Drift Aquifer may be modified by increased water infiltration from gravel processing activities (DEIS, page 110).

- ~~Any pumping from aquifers contributing to the flow of Sequelitchew Creek should be avoided, particularly from the Vashon Drift Aquifer.~~ Pumping from these aquifers could reduce the flow of Sequelitchew Creek, by reducing groundwater recharge, thus increasing contamination of the creek's waters.

Sincerely,



Merritt E. Tuttle
Division Chief

cc: WDE
WDW
WDF
USFWS, Olympia
EPA, Seattle