



City of Tacoma
Planning Commission

Christopher Karnes, Chair
Anthony Steele, Vice-Chair
Morgan Dorner
Robb Krehbiel
Brett Marlo
Matthew Martenson
Jordan Rash
Payton Swinford
(District No. 4 - vacant)

Public Comments

Meeting: Wednesday, October 16, 2024

Submittal: Written comments received at planning@cityoftacoma.org

Subjects: Comments are addressing the following Discussion Item(s) on the agenda:

F2 – Planning Commission Annual Report and Work Program

No. of Comments: Two



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¿Necesitas información en español? Cần thông tin bằng tiếng Việt? 한국어로 정보가 필요하십니까? ត្រូវការព័ត៌មានជាភាសាខ្មែរ?

Нужна информация на русском? Потрібна інформація українською мовою? Contact TacomaFIRST 311 at (253) 591-5000.

From: [Cathie Raine](#)
To: [Planning](#)
Subject: Public Comments for October 16th Meeting
Date: Wednesday, October 16, 2024 12:00:04 PM

Dear Commisioners,

I am submitting the following concerns (and questions) regarding the STGPD UPDATES portion (# 4) in the 'Planning Commission Annual Report 2023-2024 and Work Program 2024-2026' (draft) report submitted by Brian Boudet at the October 2nd 2024 meeting:

1. Require the use of a Consultant Company that have consultants credentialed to provide the "best available science" for these STGPD studies of the Aquifer status, infiltration information....the use of a hydrogeologist consultant is the most appropriate choice for completion of an accurate and thorough groundwater and aquifer system study and report/recommendations. The Planners/PDS Dept has chosen to use the HDR Company for studies and recommendations for the updates with the STGPD codes. Does this HDR Company employ or use hydrogeologists for evaluations if aquifer/groundwater situations? Is the use of these HDR Company Consultants the best choice to study Tacoma's drinking water situation??

I am asking this question because the 'Robinson-Noble Company' Consultants (hydrogeologists) were previously used (2016) for studies connected with the 'Tacoma Mall Growth Center Neighborhood Project'....also located within the STGPD boundaries. Why isn't this same company being used for the study of the entire STGPD?

2. The information (data regarding the loss of pervious surfaces/infiltration areas) from the Bridge Industrial warehouse/'Bridge Point Tacoma' site..to be completed in 2026..needs to be included in the studies of the STGPD.

The PDS Dept staff/Consultants should NOT be excluding the infiltration rate changes information related to this project site from any studies and STGPD Updates. This project construction (permit # LU21-0125) is underway with building foundations already in place.

3. The Planning Commission to encourage the continued communication/involvement between the Planners and the STNC Board regarding the language used for writing the updates with codes and regulations connected to the STGPD updates.

Please consider..and include the above concerns/suggestions as part of an 'update' for the STGPD Updates 'Work Plan'.

Thank you,

Cathie (Raine) Urwin

From: [Heidi S.](#)
To: [Planning](#)
Cc: matthewgmartenson@gmail.com; assteele@msn.com; jordanrash.tacoma@gmail.com; TPCDorner@gmail.com; sandeshtpc@gmail.com; bsanthuff@gmail.com; robb.krehbiel@gmail.com; brettmarlo18@gmail.com; chris.tacoma@gmail.com
Subject: Public Comments to Planning Commission 10/16/2024
Date: Wednesday, October 16, 2024 11:09:45 AM

Note: I don't have an email address for Payton Swinford, Council District 3, if you could please forward this public comment to that commissioner -and- provide that address to me, thanks.

Public Comments re: STGPD Work Plan
 10/16/2024 Planning Commission Meeting

It's discouraging that, despite having signed-up for South Tacoma Groundwater Protection District project updates and the repeated requests for meaningful involvement in the process, I received no advisement of tonight's STGPD agenda topic except by the community's own short-notice discovery.

It's also frustrating that STGPD items are scheduled for Planning Commission meetings on nights which directly overlap with that of the South Tacoma Neighborhood Council (the entity which submitted the annual amendment application on this STGPD/STEGZ issue), preventing a number of community members from giving oral comments to your commission. We are having to consider changing our long-standing meeting times, to avoid repeats of this continually conflicting scheduling.

However, in review of the agenda packet, the details are unclear of the "work plan" being proposed (much less still no code draft to review), to even fully comment on, except to note it seems unacceptable for the "Economic Green Zone" portion continue being pushed so far out:

From this meeting's agenda packet:

"Expected Work Program for 2026 (very preliminary)"

- *2027-2032 Capital Facilities Program (CFP)*
- *South Tacoma Economic Green Zone – Subarea Plan (pending budget consideration)*

Resolution excerpt:

*WHEREAS, the Planning Commission has accepted the application from the South Tacoma Neighborhood Council to consider the establishment of an Economic Green Zone in South Tacoma, and
 WHEREAS the City Council acknowledges that this effort will likely entail a Subarea Plan and Environmental Impact Statement ("EIS") that will require several years to complete and is contingent upon further budget decisions;
 Now, Therefore, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF TACOMA: Section 1. That the work plan for the South Tacoma Groundwater Protection District amendments to the Tacoma Municipal Code, as recommended by the Planning Commission as part of the 2022 Annual Amendment to the Comprehensive Plan and Land Use Regulatory Code, as set forth in the attached Exhibit "A," is hereby adopted. ~ June 28, 2022*

The city can apparently afford ongoing multifamily-development tax-breaks, and to continually avoid applying impact fees, but when it comes to studying aquifer protections we see repeated stalling and endless deflecting to budget considerations of consultant funding, resulting in little action.

Instead of actually presenting "best available science" at this point, that term now seems to be used as another delay tactic.

Quite some time ago, PC had strongly instructed PDS to review surrounding municipalities' groundwater/aquifer recharge limitations of impervious surface, but that still hasn't seemed to have been done. An impervious surface policy should have been put in place decades ago, but (when residents brought the oversight to the City's attention) the city should at least have already been reviewing similar policies from surrounding cities. The amendment application had been submitted in 2021, but while other cities and the county are now updating their aquifer recharge critical area policy, Tacoma still has none.

As an example, here is Pierce County's most current Critical Areas code update draft ordinance:

<https://online.co.pierce.wa.us/cfapps/council/model/otDocDownload.cfm?id=39255868&fileName=O2024-553s%20Ordinance%20with%20Exhibits.pdf>

Considering the immense importance of the South Tacoma Groundwater Aquifer in the near future, Tacoma's protection policy should be even more restrictive than the county's (and Tacoma should have been advocating to the county to protect the outlying recharge areas affecting the STGPD), but at least this example could be a start for incorporating our first CARA protections (which Tacoma has been out of compliance of, for decades).

Instead, from the community's view, it seems PDS proposes their prepared plans for PC to pass (so PDS is essentially acting as pre-decision makers, not as simply staff assistants for PC), and then PDS is able to tell the community that their hands are tied (since PDS must follow the PC approved plan, even though it's the plan PDS, themselves, created).

So, I'm requesting that this commission please bump PDS out its holding pattern, and insist for appropriate examination of Critical Aquifer Recharge Area, impervious surface limitations — not just a consultant's compilation of general information, but actual focused study of this particular geohydrographic environmentally sensitive area, specifically pertaining to and directly supporting any final code update conclusions.

Thank you,
Heidi Stephens