

**From:** Cathie Raine <cjrrd@hotmail.com>  
**Sent:** Monday, February 19, 2024 4:21 PM  
**To:** City Clerk's Office  
**Subject:** STGPD Moratorium extension (comments for City Council members review: 'Public Hearing' scheduled for 2/20/2024 during Council Meeting)

**Follow Up Flag:** Flag for follow up  
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Dear Mayor Woodards, Deputy Mayor Hines and Council Members,

I am writing to support and recommend the approval of the time extension of the 'STGPD Moratorium'. However, this extension of the moratorium time period needs to come with the addition of 'impervious surface'/ mature tree removal limitations to the previously written 'moratorium' with the STGPD.

The Planning and Development Services Dept Planners, with their presentations to the Planning Commission and City Council members, now have a plan to coordinate/integrate the STGPD updates in with other (now required) code updates. So, the STGPD updates completion is forecasted to be delayed for 1 1/2+ total years from the start of this moratorium.

While it may seem to be a reasonable plan to integrate the STGPD updates in with other code and plan updates, I have the following concerns with the 'time extension' of this 'moratorium' as currently written:

1. Further housing and business development plans (over the next year) in South Tacoma will further increase the amounts of impervious surfaces. The 'build out' of the Tacoma Mall sub-area with housing plans will further increase housing density (removal of lawns/plants/trees) in an area already with inadequate tree canopy. Most of the housing development construction will also be occurring PRIOR to any of the updated 'Home in Tacoma'(HIT) building guidelines are in place. Construction Companies will have fewer restrictions for new construction if the projects are approved prior to HIT.

Unbelievable to imagine, a new 100+ apartment complex has been approved to be built on a forested/ yet to be developed piece of land across the street from the Bridge Industrial 'warehouse' site (near South Tyler and South 56th intersection). I believe that I read that maybe 8 mature/limited number of trees will remain from that forested piece of land for that apartment project.

Additional business development is also planned in the Tacoma Mall area..with the addition/expansion of impervious surfaces.

With the additional development, increases in traffic also will occur (increased tire-related pollutants)

2. Will the critical study of our Aquifer status (with the 'Climate Change' and Mega-warehouse' adverse aquifer impacts included) be conducted by an outside (non-City, non-Tacoma Water affiliated) objective consultant? The current Planner plan seems to be to use the Tacoma Water's IRP update already scheduled to be done in 2024.

The main overall concern with this delay with the STGPD updates: the amount of development (both business and residential project-related) that can occur over the next year in South Tacoma. All of the land area planning (industrial, commercial and residential) needs to be included with these STGPD updates...as ALL project development impacts the quality and quantity of water in our Aquifer!

The Planners need to assure the residents that this STGPD update delays will be worth the wait as this extra time (with the moratorium extension) will provide the time needed for a thorough, objective study of our Aquifer's future capacities. Placing impervious surface limitations on now is also needed to avoid further decreases in the Aquifer. Otherwise..this extension is just being used as a 'stalling tactic' to allow the completion of certain projects within the STGPD area.

Respectfully submitted,  
Cathie (Raine) Urwin  
(South Tacoma resident)

**From:** Heidi S. <heidigs@hotmail.com>  
**Sent:** Monday, February 19, 2024 4:16 PM  
**To:** City Clerk's Office  
**Subject:** Public Comments re: STGPD Moratorium Extension

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**February 20, 2024 Public Hearing**  
**Re: South Tacoma Groundwater Protection District Moratorium Extension**

I support the extension (for as long as the STGPD code is outdated); however, this Council did not include, in the initial limited moratorium, the main reasons which residents had first called for it; so the limited moratorium didn't go far enough and is still needing consideration of:

- Impervious surface limitations for industry/commercial but also for residential zoning and construction, including
- Tree canopy preservation and open green space minimums,
- Prohibiting any "exceptions" to the code, as is currently allowed and is being misused, and preferably a
- Moratorium on all development (private, commercial, city, industrial, residential) until the STGPD code has been appropriately updated.

... because:

- The STGPD overlay supersedes zoning, but somehow the city has allowed PDS to somehow get that flipped,
- Residential construction is now just as "high impact" as commercial / industrial, due to many multi-unit constructions,
- The STGPD code update requires expert scientists, not the same city departments which have neglected and gotten us to this point,
- There's not adequate action/consequences for violations,
- The Green River will not be a lasting source of water (see articles, below); regardless of possibly more rain, the climate change is eliminating snowpack/river run-off, but will instead cause lower elevation stormwater flooding while not properly allowing best infiltration to recharge our vitally important aquifer.

Some information noticeably absent from last week's PDS Study Session presentation:

- PDS has not correctly been conducting critical area permitting, completely omitting critical aquifer recharge in their reviews (the STGPD code is not a substitute for this) despite acknowledging in the 2/13/24 Study Session and in previous meetings confirming this is a critical area and that "critical aquifer recharge" is a category, yet PDS does not conduct required analysis of critical aquifer recharge in their Critical Area Permit reports (another example of City words opposite of City actions) and allowing for potential devastating and irreversible damage.
- Environmental Services addresses stormwater runoff, but that is different than groundwater aquifer infiltration,
- TPU-Water has discovered contaminant PFAS and needs to improve testing and well protection,
- TPCHD only does cursory monitoring of limited businesses,
- Nearly none of the public input was included in the original moratorium and needs to be.

Applicable Articles:

**When More Rain Means Less Water**  
**In the Pacific Northwest, snowpack recharges our drinking water and powers our lives. Now winter precipitation is increasingly falling as rain.**

[https://replica.seattletimes.com/popovers/dynamic\\_article\\_popover.aspx?artguid=e32a83ab-a76f-4eee-b0df-92f13cf5876c&appcode=SEATTL&eguid=d1fd3cd1-27a8-4b4d-964b-0180c315635c&pnum=4&fbclid=IwAR1sZNFN4XdEfoQW-uO7EtOmueRsJPZnCTneFazmq5MuGvF4w\\_K2ultX1Q8#](https://replica.seattletimes.com/popovers/dynamic_article_popover.aspx?artguid=e32a83ab-a76f-4eee-b0df-92f13cf5876c&appcode=SEATTL&eguid=d1fd3cd1-27a8-4b4d-964b-0180c315635c&pnum=4&fbclid=IwAR1sZNFN4XdEfoQW-uO7EtOmueRsJPZnCTneFazmq5MuGvF4w_K2ultX1Q8#)

**Washington state drinking water, hydropower at risk as Pacific Northwest snowpack shrinks**

[https://www.columbian.com/news/2024/feb/12/washington-state-drinking-water-hydropower-at-risk-as-pacific-northwest-snowpack-shrinks/?fbclid=IwAR0Zw6RR43cp4HfkayvcOzpbXGkMluifaROkaSMaSeVT6n\\_DVChEqPcoGns](https://www.columbian.com/news/2024/feb/12/washington-state-drinking-water-hydropower-at-risk-as-pacific-northwest-snowpack-shrinks/?fbclid=IwAR0Zw6RR43cp4HfkayvcOzpbXGkMluifaROkaSMaSeVT6n_DVChEqPcoGns)

**WA's mountain snow recharges our drinking water, powers our lives. Now it's turning to rain.**

[https://www.seattletimes.com/seattle-news/environment/wa-drinking-water-hydropower-at-risk-as-pnw-snowpack-shrinks/?utm\\_source=facebook&utm\\_medium=social&utm\\_campaign=article\\_inset\\_1.1&fbclid=IwAR0CrEggAercu89yvZwisICfqwYM2t5eja\\_SWVH7HtQ6FH8RcEBDEFuKJEc](https://www.seattletimes.com/seattle-news/environment/wa-drinking-water-hydropower-at-risk-as-pnw-snowpack-shrinks/?utm_source=facebook&utm_medium=social&utm_campaign=article_inset_1.1&fbclid=IwAR0CrEggAercu89yvZwisICfqwYM2t5eja_SWVH7HtQ6FH8RcEBDEFuKJEc)

**WA Dept. of Ecology: July drought declaration still in effect (into 2024)**

[https://ecology.wa.gov/blog/february-2024/washington-s-july-drought-declaration-still-in-effect/?fbclid=IwAR0bAG-onvHkmu15s603FwkXXxUIQI9vT3FvtLK00KKkqV\\_YpGIF8-Rnets](https://ecology.wa.gov/blog/february-2024/washington-s-july-drought-declaration-still-in-effect/?fbclid=IwAR0bAG-onvHkmu15s603FwkXXxUIQI9vT3FvtLK00KKkqV_YpGIF8-Rnets)

Related questions/comments to the City Council following the 2/13/24 Study Session discussion of the above issue:

CM Bushnell referred to possible other moratoriums... what additional moratoriums?

(The point of this moratorium is to pause for environmental protection, not to create "immediate clarity" for businesses.)

Glen George, TPU-Water mentioned the IRP final in the fall for public to see, and of an Advisory Committee... who will be invited to / involved in that committee?

Possible South Tacoma Health Impact Assessment: mentioned of a MOU for pilot program into long-range planning... but when will this actually result in a completed HIA for South Tacoma?

Still no outside expert or other agency input yet for the STGPD code update?

After decades of South Tacoma being ignored and/or overburdened, are residents in other areas of the City really asking why attention is (finally) focusing a bit on South Tacoma? As of yet, nearly none of the previous Strategic Planning (for South Tacoma over the decades) has ever fully been followed-through/implemented, so real action is now needed, not more never-to-be-applied consultant studies which are used to only make it look like South Tacoma was given attention. We urgently expert data to determine swift improvements as soon as possible.

Thank you,  
Heidi Stephens

**From:** Anneliese Simons <tacomasummer@gmail.com>  
**Sent:** Monday, February 19, 2024 3:45 PM  
**To:** City Clerk's Office  
**Subject:** Comment, Moratorium Extension for South Tacoma Groundwater Protection District

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City of Tacoma Representatives,

I respectfully request that you continue and make permanent the moratorium to prohibit new development or expansion of existing underground storage tanks or metal recycling/auto wrecking facilities in the STGPD.

I would ask that you extend the moratorium, permanently to include all industrial purposes, including warehouses and fulfillment centers. The STGPD needs protection and should be maintained as an aquifer for the City of Tacoma.

We need open ground so water can be absorbed into the water table of Tacoma. Having the STGPD as a park or restoring it to a nature preserve would serve the community by allowing for aquifer protection and green space for all community members to enjoy, people and wildlife.

Sincerely,  
Anneliese Simons  
2905 South 17th Street  
Tacoma, WA 98405

**From:** Amanda Swarr <amandaswarr@yahoo.com>  
**Sent:** Monday, February 19, 2024 2:07 PM  
**To:** City Clerk's Office  
**Subject:** South Tacoma Groundwater Protection District

**Follow Up Flag:** Flag for follow up  
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Hello,

I am writing to submit my comments on the moratorium extension currently under consideration in the South Tacoma Groundwater Protection District.

As a resident and homeowner in South Tacoma since 2007, I am strongly opposed to underground storage tanks and metal recycling and auto wrecking facilities in this region. This is a highly populated urban area of Tacoma that already faces a number of environmental challenges, and scientific research has already shown that development of this kind would be severely detrimental to groundwater in this area.

I strongly support the extension of the moratorium and, indeed, call for policy that would prohibit this kind of development and threat to the well-being of residents and property owners interests indefinitely.

Thank you for your consideration.

Amanda Swarr  
414 S 34th St  
Tacoma, WA 98418

**From:** Dale Bickenbach <BickDaleN@outlook.com>  
**Sent:** Monday, February 19, 2024 1:49 PM  
**To:** City Clerk's Office  
**Cc:** Moeinian, Maryam  
**Subject:** South Tacoma Groundwater Protection District

**Follow Up Flag:** Flag for follow up  
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The Moratorium to protect subject should be made permanent. At the time of my birth, time to graduate from Stadium High, and for decades after ground water was an afterthought, if at all considered. Geologists may know a good deal, but the importance has only become a public issue in very recent years. As stated previously the snow level is getting higher up, but the mountains are not increasing in height. Our protections are too limited and the coordination between the vast area of communities sparse.

More needs to be done restricting water consumption. Lawns do not have to be green, and brown lawns recover. Hydropower and our drinking water are two major resources. Quality drinking water is not a good to have, it is essential.

Thanks.

dnb

Dale N Bickenbach  
5232 South Mason Avenue  
Tacoma, Washington  
98409-1817

+ 1 253 475 5242 (Please e-mail, first)

**From:** Andrea Reay <andrear@tacomachamber.org>  
**Sent:** Tuesday, February 20, 2024 11:08 AM  
**To:** City Clerk's Office; Woodards, Victoria; Rumbaugh, Sarah; Scott, Jamika; Bushnell, Joe; Hines, John; Ushka, Catherine; Daniels, Kiara; Diaz, Olgy; Walker, Kristina  
**Cc:** Ryan Spence  
**Subject:** STGWPD Letter  
**Attachments:** STGWPD-Moratorium-TCC-Letter-FINAL.pdf

Hello Mayor Woodards and Council,

I realize that we missed our deadline to submit comments prior to your meeting tonight. I will be there to provide comment in person and want to thank you for continuing to solution find with us.

As always, please feel free to reach out to Ryan, copied here, or me if we can provide any further context or clarify.

Many Thanks,  
Andrea

**Andrea H. Reay, IOM**

**President & CEO**, Tacoma-Pierce County Chamber

**Direct:** (253) 682-1736

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[www.tacomachamber.org](http://www.tacomachamber.org)

## TACOMA - PIERCE COUNTY CHAMBER

February 20, 2024

Council Members,

We are providing public comment in opposition to the extension of the South Tacoma Groundwater Protection District Moratorium. The moratorium is unneeded and unwarranted when considered in the context of the existing regulations. We do not have a crisis in South Tacoma. There is no indication of groundwater contamination in South Tacoma Groundwater Protection District. The current regulations for the Groundwater Protection District and the ongoing monitoring of well sites are working and have been a successful strategy since their adoption in 1988. As written:

“The South Tacoma Groundwater Protection District is an overlay zone that protects the aquifer by imposing regulations on businesses in the area for the handling, storage, and disposal of hazardous substance. In order to preserve public health and safety, this overlay zoning district imposes additional restrictions on high-impact land use development.” Per cityoftacoma.org.

The moratorium puts an undue burden on our industrial recyclers. Industrial recycling is a key component of sustainability and is in alignment with the City’s Green Economy strategy. Allowing these industrial operations to scale is critical to expanding workforce and capacity to meet the needs of our growing community. Scaling will allow existing operations to activate rail lines and reduce truck traffic in South Tacoma. Transitioning to rail from trucking is an important step in reducing both carbon and particulate emissions as well as reducing traffic volumes. Industrial recycling supports our regions shipyards, manufacturing, and building sectors. The ability to process these materials locally greatly reduces environmental impacts and supports economic development.

If the Council chooses to extend the moratorium, we are requesting to amend the moratorium to exclude existing permitted industrial recycling operations in South Tacoma. These permitted facilities are regulated and inspected for compliance every other year.

This proposed amendment to exclude permitted industrial recyclers from the moratorium is consistent the recommendations of the IPS Committee relating to the moratorium:

“Expansion of Existing Uses: The IPS Committee found that a moratorium that is too restrictive on the expansion of existing uses could have the counter effect of prohibiting improvements that provide environmental benefit or reduce the risks and impacts of existing uses. Therefore, the moratorium should allow for reasonable facility and site development that improves environmental outcomes while avoiding the introduction of new risks to the City’s groundwater resources.” Per cityoftacoma.org.

It is important that the City differentiate between large scale permitted recyclers who are compliant with environmental regulations and have contemporary groundwater containment and mitigation infrastructure in place from pop-up scrap recycling operations that are largely unregulated or permitted and lack groundwater protection infrastructure. In addition to exemptions for permitted facilities, we suggest that the City apply the same classification system for recycling operations as recommended for the exemptions to the tax on commercial recycling operations.

Thank you for your consideration.



Andrea H. Reay, President & CEO Chamber of Commerce



Ryan Spence, Director Manufacturing Industrial Council

