

**From:** Cathie Raine <cjrrd@hotmail.com>  
**Sent:** Monday, February 3, 2025 1:53 PM  
**To:** City Clerk's Office  
**Cc:** Debbie Cockrell  
**Subject:** City Council Meeting (2/4/25)

These comments submitted for the February 4, 2025 Public Hearing for the extension of the 'South Tacoma Groundwater Protection District'(STGPD) moratorium.

\*\*\*\*\*

Dear Mayor Woodards, Deputy Mayor Daniels and City Council Members,

Well...we have yet another delay with getting an update of the STGPD to include (but, not limited to):

(1) STUDIES... (reportedly 'best available science' used to conduct objective studies..and, NOT 'scoped' studies per usual PDS Dept 'adopted practices). These studies to also include impervious surface/housing and industrial development considerations and impacts on the aquifer water supply AMOUNTS and water QUALITY.

(2) TMC UPDATES..to include monitoring parameters and enforcement regulations that WILL be used in the future.

(3) EXPAND the geographical/hydrogeological areas beyond the City of Tacoma boundaries..to include other cities and communities in Pierce County.

(4) COORDINATION and INPUT from other entities and communities

Back in 2022, the City of Tacoma officials/PDS Dept staff/Planning Commission had the opportunity to move forward on these STGPD updates...to assure that our groundwater/back-up drinking water supply would be the number "1" priority for our residents.

Also...around that same time: pre-application meetings had started with the PDS Dept staff to build that 2.5 million sq ft warehouse project..over that aquifer. 'Tough' choices involved..

And, we already know, the PDS Dept/City of Tacoma chose to 'delay' the STGPD Updates.. to continue with the 'heavy industrial' zoning in South Tacoma, to continue with heavy development (Bridge Industrial Warehouse project) in unimaginable ways!

I mean..this South Tacoma area was "supposed to continue as the 'industrialized' area" of residential Tacoma....an 'opportunity' area for businesses.

Then...much later on..work on these STGPD Updates..when convenient for the PDS Dept.

NONE of these STGPD Moratoriums would have been needed IF these STGPD updates had been handled responsibly and with careful consideration of the Tacoma residents back in 2022. The work effort could have started immediately.

The PDS Dept staff have claimed that coordination was needed with other 'land use' planning and with the Comprehensive Plan updates etc...that the whole process of having the STGPD 'overlay' with land zoning may need to be changed..that these STGPD updates amounted to nothing.

These 'moratorium' delays have continued because the City officials did not place a high value on our drinking water supply quality and quantities! Pretty irresponsible and reckless to gamble with our future water supply situation. Also...more than the 'drinking water' is at risk with these cont'd delays..with the potential harms also inflicted on the environment...impacting both State and Federal waters.

So..of course..continue with this 'moratorium' extension plans...vote to approve this ordinance.  
However, all of you City Council members need to insist that these STGPD code updates are written to fully protect the South Tacoma aquifer/groundwater situation. Do not allow any shortcuts with studies if the aquifer. Also..remember that residents and the environment in Tacoma have been sacrificed for future business activities...with these continued delays..

Respectfully submitted,

Cathie (Raine) Urwin

**From:** Ryan Spence <RyanS@tacomachamber.org>  
**Sent:** Monday, February 3, 2025 1:06 PM  
**To:** City Clerk's Office  
**Subject:** Public Comment STGPD Moratorium  
**Attachments:** Public Comment STGPD Moratorium 2\_3\_25.pdf

Please find our attached written public comment for the STGPD Moratorium extension.



**Ryan Spence**

**Director**

Manufacturing Industrial Council for the South Sound

A Program of the Tacoma-Pierce County Chamber

T (253) 682-1720 | E [ryans@tacomachamber.org](mailto:ryans@tacomachamber.org)



2/3/2025

Dear Mayor and City Council,

The Tacoma Pierce County Chamber and the Manufacturing Industrial Council are providing public comments 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 substances. To preserve public health and safety, this overlay zoning district imposes additional restrictions on high-impact land use development.”  
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 region’s 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 with 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.” Cityoftacoma.org

It is important that the City differentiates between large scale permitted recyclers who compliant with environmental regulations and have contemporary groundwater containment and mitigation infrastructure in place from pop-up scrap recycling operations that are largely unregulated for 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.

