



City of Tacoma
Sustainable Tacoma Commission

September 17, 2022

TO: Infrastructure, Planning, and Sustainability Committee

RE: Proposed STGPD Moratorium

Dear IPS Committee Chair Walker and Committee members,

The purpose of the Sustainable Tacoma Commission is to advise City Council and staff on sustainability initiatives, bringing community accountability to implementation of the City's vision for sustainability¹, 2022 Climate Action Plan², and other sustainability policies. We are writing today to express our support for the proposed South Tacoma Groundwater Protection District moratorium as proposed by the Planning Commission, as well as some additional recommendations and considerations.

The South Tacoma Groundwater Protection District, which sits above the South Tacoma aquifer, makes up a substantial portion of South Central Tacoma. In designating this District, the City and County have recognized that certain urban land uses jeopardize the quality of this groundwater, including excessive stormwater runoff, above ground storage tanks, and large quantities of hazardous substances. This area of Tacoma is a hotspot on the City's equity map, indexing it as "very low" opportunity. Frontline areas of Tacoma, like this area of South Tacoma, are deserving of particular attention to environmental hazards and challenges, both through historical practices such as redlining, and current policy and development decisions.

The STC is appreciative of the work the Planning Commission and the Planning Department did in a very short time on investigating the severe concerns expressed by many community members regarding the ongoing safety of the South Tacoma aquifer. The Planning Commission has proposed a one year moratorium pending updates to the STGPD allowable uses on the following land use types:

- New metal recycling/auto wrecking businesses
- New underground storage of hazardous waste
- New auto oriented uses
 - Gas stations
 - Vehicle service and repair

¹https://www.cityoftacoma.org/government/city_departments/environmentalservices/office_of_environmental_policy_and_sustainability

²<https://cityoftacoma.org/cms/One.aspx?portalId=169&pageId=193914>

We support the proposed moratorium, as it is clear that the cumulative effects of intensive uses in the STGPD aren't currently understood. Pending analysis of the best available science to inform updates to the STGPD code, it is imperative to halt potential new sources of pollution.

As Council takes up the issue of this moratorium and other issues related to the STGPD and the South Tacoma aquifer, we recommend that Council also consider the following:

1. The aquifer recharge area extends well beyond the STGPD and the City of Tacoma's jurisdiction down to Frederickson and the Roy Y. Yet with warehouse development and other development taking place above the recharge area, there is no clear indication of how much impervious surface the aquifer can withstand before its natural recharge system is compromised. We recommend that the City work with the County to understand these cumulative effects, and to have a regional strategy for protection of this aquifer.
2. Tacoma Water shared a graph showing that in 2015 they drew 16,000 acre feet of water because the Green River water levels were unusually low due to drought. They shared they could draw as much as 27,000 acre feet if needed, though would need more pumps to do so. The UW Climate Impacts Group No Time to Waste Report³ uses 2015 as a likely scenario in our climate future. What does it take to guarantee an annual recharge of at least 16,000 acre feet of water?
3. STC supports the Planning Commission's effort on a South Tacoma Economic Green Zone. Since the development of appropriate code will take some time, Council should consider designating physical space for green businesses to come to the area. This would be a major win for equity in terms of clean jobs for frontline workers, and a step closer to the City's CAP goals
4. New research is now showing that stormwater pollution from tires is extremely toxic to salmon⁴, and Leach creek is a salmon-bearing creek that receives stormwater runoff from this area of Tacoma⁵. With greatly increased freight traffic to the area from the proposed Bridge Point Warehouse project and the potential New Cold expansion, is the City using the best available science to mitigate tire pollution from road stormwater runoff, for example with special soil gutters⁶?
5. The health impacts of air pollution are well known. Increasing truck traffic will increase the particulate air pollution in an area that is already exposed to significant traffic-related air quality impacts. The City should consider sponsoring a network of air quality monitors to assess this area of Tacoma. Currently, there is only one listed monitor on the PSCAA website in this area.

We appreciate the time the council is taking to study the concerns of its residents and try to find new ways to address equity and anti-racism in the community. The health of each neighborhood's environment directly connects to the health of its residents. STC supports the city's efforts in looking at the city neighborhood by neighborhood.

³ <https://cig.uw.edu/projects/no-time-to-waste/>

⁴ https://www.fisheries.noaa.gov/feature-story/roadway-runoff-known-kill-coho-salmon-also-affects-steelhead-chinook-salmon?utm_medium=email&utm_source=govdelivery

⁵

https://www.ezview.wa.gov/Portals/_1962/images/WREC/WRIA12/201907/30/WRIA%2012%20SoTacomaHoldin gBasinLeach%20Creek%20Alt%206%20Supplemental%20Memo.pdf

⁶ <https://www.fisheries.noaa.gov/feature-story/simple-soil-mixture-reverses-toxic-stormwater-effects>

Thank you.

Sincerely,

Evlondo Cooper III

Evlondo Cooper III, Co-Chair

A handwritten signature in black ink, appearing to read 'Lexi Brewer', with a stylized, flowing script.

Lexi Brewer, Co-Chair

CC: City of Tacoma Office of Environmental Policy and Sustainability
City Manager Elizabeth Pauli
Interim Deputy City Manager Kurtis Kingsolver
Planning Director Peter Huffman
Environmental Services Director Michael Slevin
Planning Commission liaison Lihuang Wung
Transportation Commission liaison Carrie Wilhelme