



AMENDMENT APPLICATION PACKET

TO THE COMPREHENSIVE PLAN AND LAND USE REGULATORY CODE

APPLICATION

Proposed Amendments to the Comprehensive Plan and/or Land Use Regulatory Code

For Office Use Only	Application No.:	
	Date Received:	
	Application Fee: <input type="checkbox"/> \$1,400	
Type of Amendment (Check all which may apply)	<input checked="" type="checkbox"/> Comprehensive Plan Text Change <input checked="" type="checkbox"/> Regulatory Code Text Change <input checked="" type="checkbox"/> Land Use Designation Change <input type="checkbox"/> Area-wide Rezone <input type="checkbox"/> Interim Zoning or Moratorium (As discussed with Planning Dept. staff, we are open to their suggested best direction.)	
Summary of Proposed Amendment (Limit to 100 words)	<p>The time has come for a broad review of South Tacoma, ST-M/IC and STGPD/aquifer recharge areas to eliminate environmental and health risks, promote an Eco-Industrial Green Zone concept in unity with the Comprehensive Plan, Urban Tree Canopy, Tacoma Environmental Act, Climate Justice Action Plan and Groundwater District Protection Code, and create a new non-polluting Green Manufacturing Industrial Area.</p> <p>We propose progressional changes for this protective overlay, aligning with Tacoma's economic and environmental goals, avoiding further costly contamination and bringing additional and progressive industrial revitalization, making South Tacoma a distinct and desirable business destination/manufacturing region unlike anywhere else in Washington state.</p>	
Applicant	Name	South Tacoma Neighborhood Council
	Affiliation / Title	STNC - Board
	Address / City, State, Zip Code	PO Box 112196, Tacoma, WA 98411
	E-mail	Board@SouthTacoma.us
	Phone	See below
Additional Contact	Name	Heidi Stephens
	Affiliation / Title	STNC- At-Large Board Member
	Address / City, State, Zip Code	N/A
	E-mail	HeidiGS@hotmail.com
	Phone	253-671-8232 (house phone, no text)
	Relationship to Applicant	Board Member
<p>I hereby state that I am the applicant listed above and the foregoing statements and answers made, and all the information and evidence submitted are, in all respects and to the best of my knowledge and belief, true and complete. I understand that submitting this application does not result in automatic acceptance of this application or guarantee its final approval.</p> <p>Signature: <i>Heidi Stephens</i> Date: March 27, 2021</p>		





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Required Questionnaire (see separate document)

The applicant is responsible for providing complete and accurate information in response to the following questions. You may type in the space under each question or provide your answers in text and/or graphic form on separate sheets of paper and reference the question numbers in your answer. List and label all applicable attachments that are included with the application. The Planning Commission and Department staff reserve the right to request additional information as needed. Any modification to the application must be submitted prior to the deadline. A pre-application meeting with staff before submitting an application is strongly advised.

1. **Project Summary** – Please provide the following information:
 - (a) A description of the proposed amendment, including the amendatory language, if applicable;
 - (b) A description, along with maps if applicable, of the area of applicability and the surrounding areas, including identification of affected parcels, ownership, current land uses, site characteristics, and natural features; and
 - (c) The current and proposed Comprehensive Plan land use designation and zoning classification for the affected area.
2. **Background** – Please provide appropriate history and context for the proposed amendment, such as prior permits or rezones, concomitant zoning agreements, enforcement actions, or changes in use.
3. **Policy Review** – Please identify and cite any applicable policies of the Comprehensive Plan and/or Land Use Regulatory Code that provide support for the proposed amendment.
4. **Objectives** – Please describe how the proposed amendment achieves the following objectives, where applicable:
 - (a) Address inconsistencies or errors in the Comprehensive Plan or development regulations;
 - (b) Respond to changing circumstances, such as growth and development patterns, needs and desires of the community, and the City's capacity to provide adequate services; (our community changes over time / vision need changing / understanding more about climate change – time to transition to be more responsible of where climate and committee is headed.
 - (c) Maintain or enhance compatibility with existing or planned land uses and the surrounding development pattern; and (STGPWD – compatibility of allowed businesses/zoning)
 - (d) Enhance the quality of the neighborhood.
5. **Community Outreach** – Please provide a description of any community outreach that you have conducted, and the response received, with respect to the proposed amendment.
6. **Supplemental Information** – Please provide supplemental information as you deem appropriate and necessary and/or as may be requested by the Department, which may include, but is not limited to, completion of an environmental checklist, wetland delineation study, visual analysis, or other studies.



South Tacoma Neighborhood Council Board Amendment Application to the Comprehensive Plan and Land Use Regulatory Code

Summary of Proposed Amendment and Purpose:

The South Tacoma Aquifer (providing up to 40% of Tacoma's back-up water supply) is damaged and threatened. The South Tacoma Groundwater Protection District (STGPD) and its current zoning overlay are in serious need of updating to reflect modern-day knowledge for better proactive action, instead of simply reacting to post-contamination which continues to occur.

We propose progressional changes to the Comprehensive Plan, Land Use Designation and Regulator Code for South Tacoma, to promote a Green Manufacturing Area more consistent with Tacoma's economic and environmental goals, as well as leveraging existing possibilities of undeveloped sites within the STGPD and aquifer recharge areas, to avoid further environmental contamination and negative health impacts, while also bringing additional economic opportunities and revitalization.

The time is well-past for developing a present-day approach to enable Eco-Industry and "New Business Incubation" while precluding hazards resulting in costly clean-up. We propose modifications transitioning away from harmful polluting industry, instead toward promoting a Green Manufacturing Zone more consistent with Tacoma's economic and environmental goals.

Our intent is a broad review to align the Comprehensive Plan, the Urban Tree Canopy, Tacoma Environmental Act, Climate Justice Action Plan and Groundwater District Protection Code into a new unified Eco-Industrial Green Zone.

Proposal for SOUTH TACOMA GROUNDWATER PROTECTION DISTRICT and Aquifer Recharge Areas ECO-INDUSTRIAL PARK AND ECONOMIC GREEN ZONE



1. Project Summary –

South Tacoma is a community made up of residential, recreational, school and business districts, yet has the worst air pollution and mortality rates in the city. Our neighborhood council and individual residents have brought concerns to the city for many years regarding the continued increase of heavily-polluting industry allowed in such close proximity to where we live, play, learn and work which has already resulted in health issues which could easily become a crisis.

It is time for a designated review of South Tacoma with special consideration of the South Tacoma Groundwater Protection District (STGPD) and aquifer recharge areas, to realign its superfund sites with EPA covenants and Pierce County policy (which is not referring solely to the notorious 12-A contaminated well; the aquifer district and concerns encompass a much larger area than that).

South Tacoma is rarely specifically cited in the One Tacoma Plan, but the little it is mentioned does not match with current proposals for industrial land use which were primarily written with the Port of Tacoma/Tideflats and not appropriate for in the middle of our city. The existing policy of infrequent "monitoring-then-correcting" does little to actually prevent contamination nor remove it afterward; it only identifies a problem after it has already occurred.

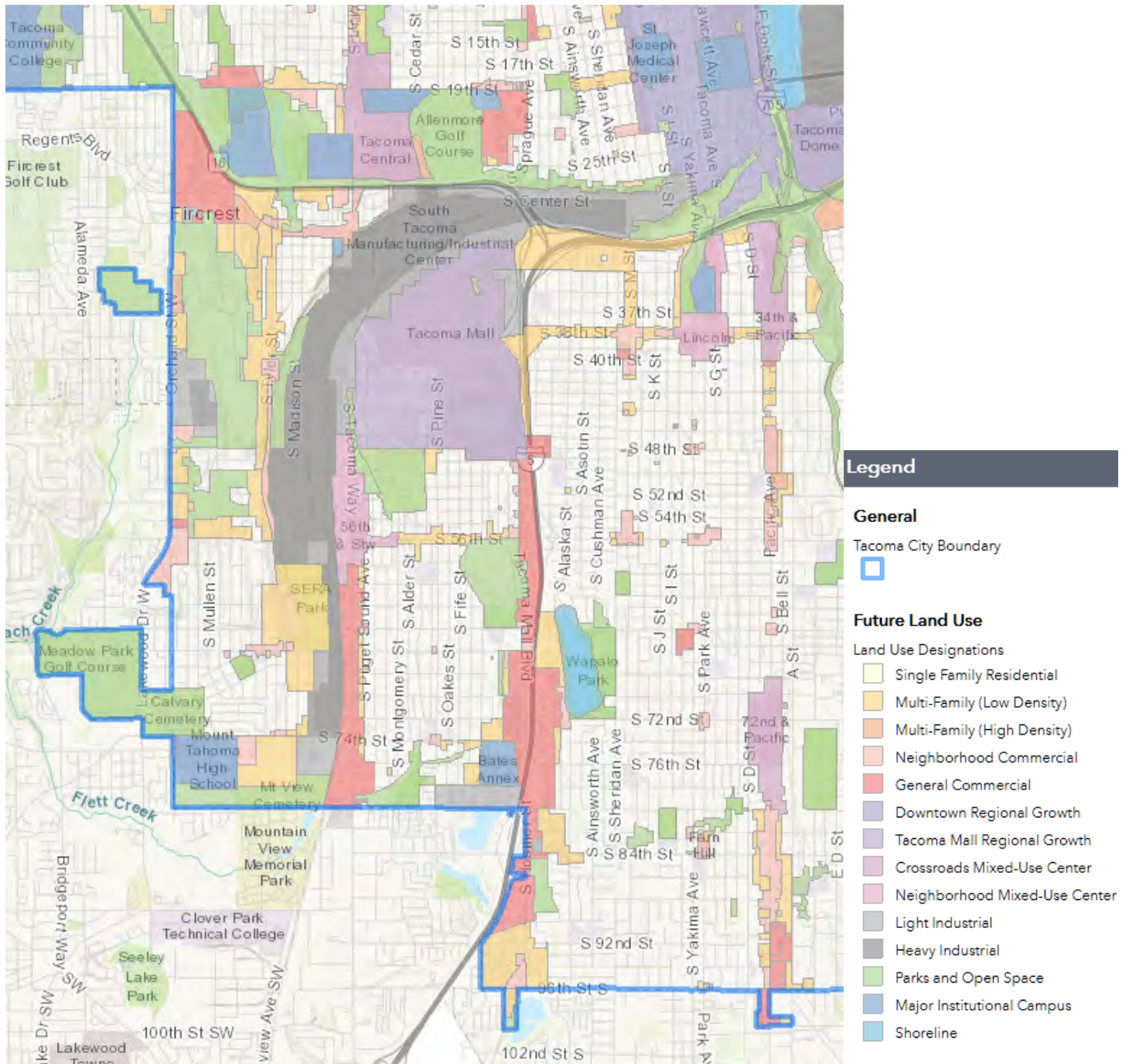
Our goal is to prevent even the possibility of contamination, going forward, by creating better protections plus incentives for non-polluting industry which would then not only avert the need for extensive monitoring and costly long-term clean up but also avoid further health and environmental issues (since, currently, contamination is not found until after damage may already be done). "Periodic review" also needs to be more clearly specified for improved and consistent overview of the STGPD and aquifer recharge areas.

It is time to give South Tacoma the consideration it has always deserved but has not yet been receiving -- especially since the city is pushing for dense in-fill housing close to the border of the current industrial zone. We need to apply climate-change initiatives to newer updated policy and better protective overlays for a more forward-thinking future. We look welcome working with the city toward this new direction, one of encouraging progressive-minded businesses to be part of a new Economic Green Zone as a sought-after location for new businesses and a leading example for our state.

“One Tacoma” Website / One Tacoma Plan Map

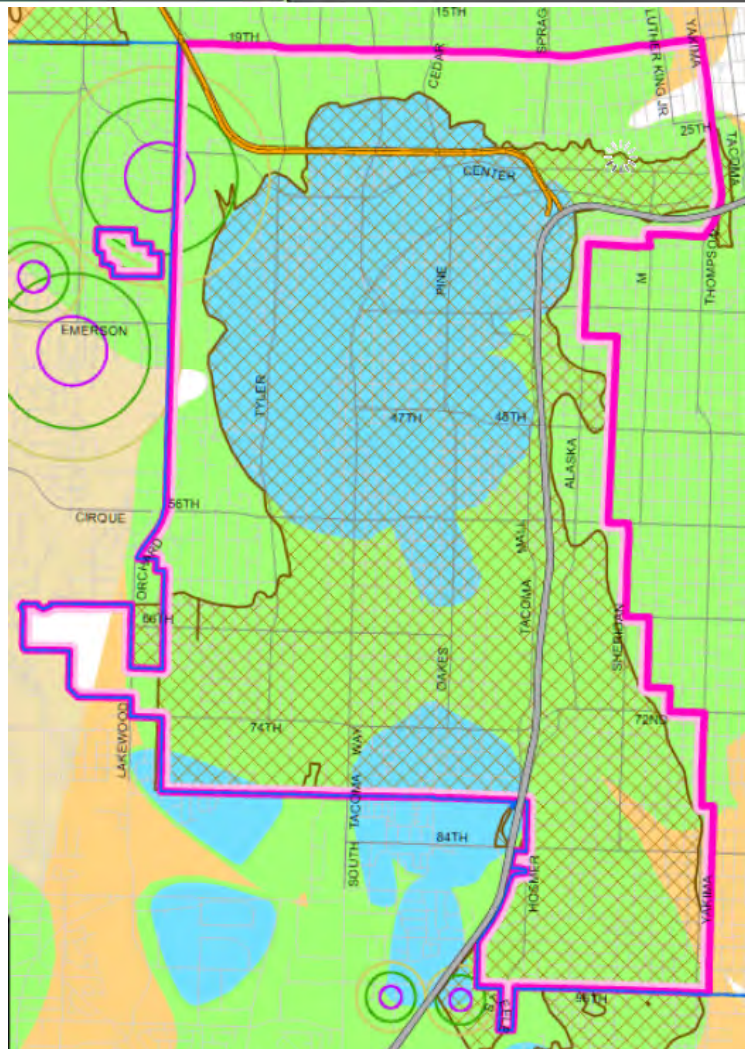
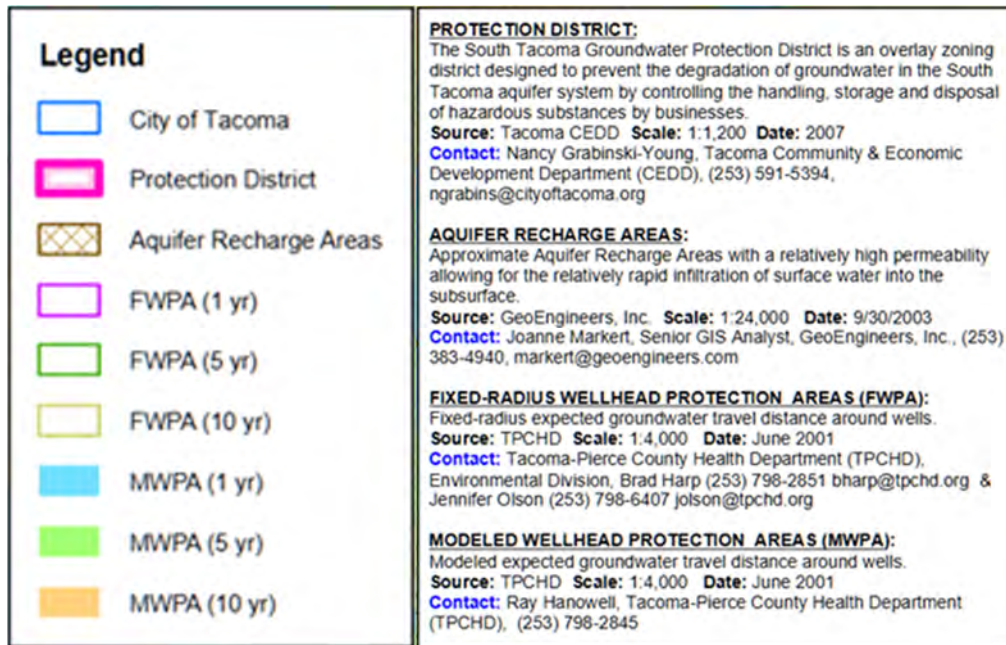
General area of the STGPD and aquifer recharge zones, indicating the scope of applicability, surrounding areas, land uses from current Comprehensive Plan and current zoning classification for affected area.

<https://wspdsmap.cityoftacoma.org/website/PDS/OneTacoma/>



City of Tacoma | Community & Economic Development Aquifer Recharge and Wellhead Protection Areas

https://cms.cityoftacoma.org/Planning/Shoreline/Maps/10_Aquifer.pdf



2. Background –

Before it was known as South Tacoma, indigenous people had named the area after elk hunted here. Early settlers brought dairy farms in the 1870s, but by 1881 a substantial amount of the land was owned by Northern Pacific Railroad. In 1891 land was purchased for the first elementary school using the area's name of "Edison" in hopes of enticing an electrical laboratory to this area, moving away from coal dust, wood and oil smoke of those days toward a brighter future. That same year, though, instead saw the opening of railroad shops (such manufacturing used steam power requiring an abundant water supply), which eventually grew to be the largest rail operation in the west and began a legacy of pollution in the area.

By 1895 the name Edison was replaced with "South Tacoma" when annexed into the City of Tacoma, and between 1892 and 1980 industrial activities at the "South Tacoma Field" resulted in the release of toxic chemicals into the soil and groundwater creating contaminated superfund sites. Over the next decades, heavy industrial zoning here seemed to be accepted as simply the norm by the city leaders; however, the spirit of Edison persists, and the residents of South Tacoma continue to encourage our city to consider new possibilities, moving away from allowing heavily-polluting industry in the middle of our urban area and above the groundwater supply which affects more than just South Tacoma.

South Tacoma seems to have been an after-thought in the currently proposed Tideflats Non-Interim Regulation preparations – only recently in this process does it seem to have been realized that a large area of South Tacoma was still zoned heavy industrial, and only even more recently were the residents of South Tacoma made aware of its inclusion in the Port of Tacoma plan. Not only is South Tacoma vastly different than the industrial tideflats, but these regulations as currently proposed are not in line with the Comprehensive Plan, Urban Tree Canopy, Tacoma Environmental Act or Climate Justice Action Plan, and certainly not the vision of an Economic Green Zone which is the necessary future.

It could be that South Tacoma is routinely overlooked since it is hard to believe that heavily-polluting industry/manufacturing is occurring in this urban location surrounded by residential, recreational and school districts, as well as above a protected groundwater and aquifer recharge areas. Unfortunately, this caustic positioning hasn't been without damage. Plastics, petrochemical, heavy-metals and other toxins have resulted in much of this once-healthy land becoming hazardous waste sites.

However, within the last decade and with the help of the EPA, steps have been taken and some areas have been contained. Still, the contaminated soil above the groundwater aquifer continues to be constant concern, as well as air quality and early mortality rates in South Tacoma being the worst in Pierce County and even the nation (per Tacoma-Pierce County Health Department / Tacoma Environmental Action Plan, siting our city as one of only 32 areas in the US below standard air quality).

Although Tacoma had begun moving in a better direction, the recent allowance of new heavily-polluting businesses in South Tacoma is a terrible step backwards. Not only does the current non-interim proposal not limiting heavily-polluting industry in South Tacoma, it actually restricts the kind of non-polluting businesses we'd like to welcome here.

Putting economy over health is archaic thinking and is also a very real form of discrimination by keeping one area of the city's lowest income residents continually subjected to higher pollution levels, lower quality of life and higher mortality rates. Significant multi-family in-fill being planned will increase the population of South Tacoma, yet the protections being put into place are for the benefit of heavy industry when it should be instead protecting residents and incentivizing non-polluting business practices.

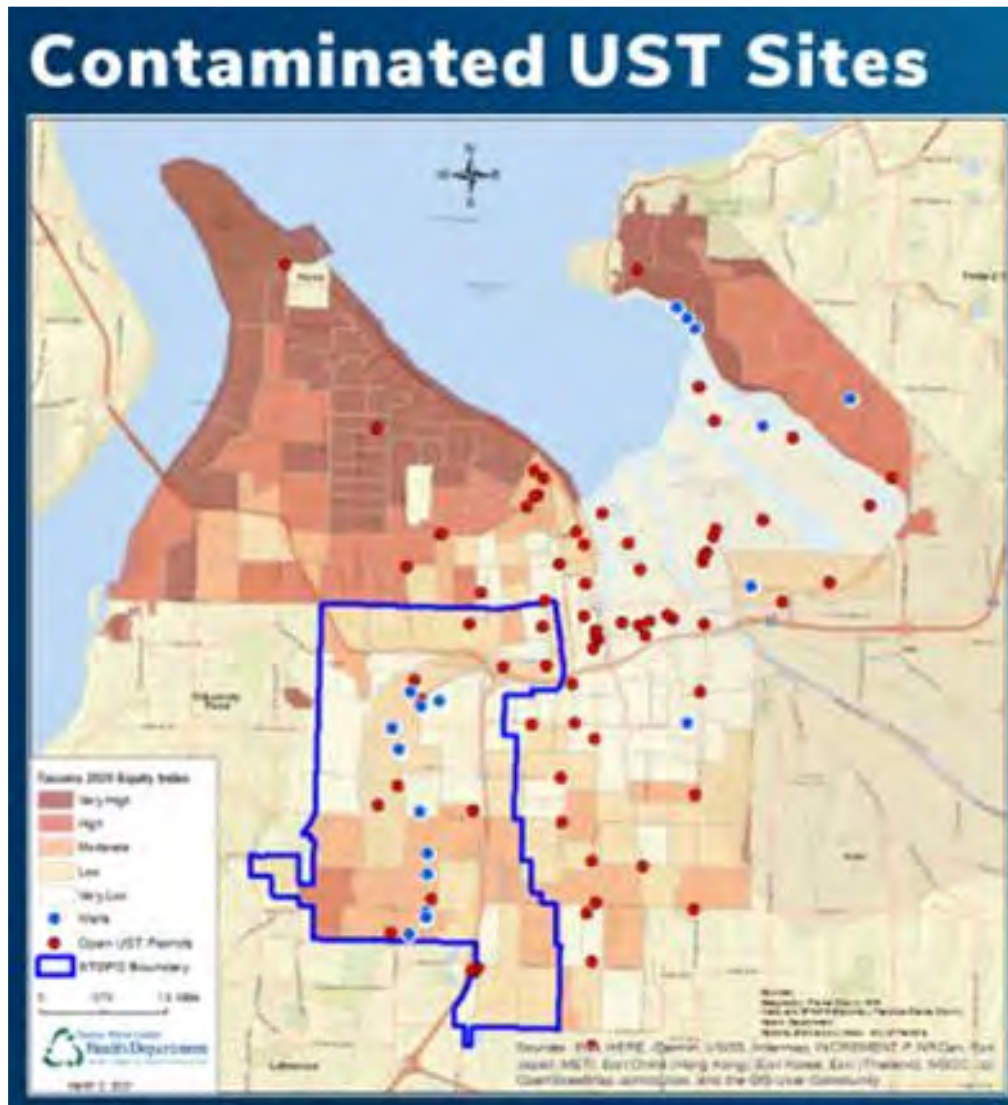
As our residents had 100 years ago, we still believe South Tacoma is worthy of singular review and deserves more than just mirroring regulations which were meant primarily for the industrial port. We must regain a better direction: any heavy industrial businesses currently in the South Tacoma Manufacturing Industrial Center (ST-M/IC) must have better monitoring - and – we also must remove the possibility of new polluting businesses or expansions in this area, going forward.

In following on the EPA's steps to stabilize damaged land and to retain that precarious balance above the aquifer, this is our chance to create a better future for South Tacoma with progressive green industry incentives and ensuring the STGPD and aquifer recharge areas have enhanced protections going forward, which will be a benefit to all of Tacoma.

Present day:

The following information was provided by the Tacoma Pierce County Health Department (TPCHD).

Roughly half of all known contamination are from underground storage tanks (USTs) which have resulted in hundreds of contaminated sites, with up to possibly 20% of businesses currently operating in non-compliance... and the TPCHD purview does not even extend to contaminated sites without UST history.



The state Department of Ecology (DOE) has over 6000 contaminated sites listed and does not have the resources to enforce cleanup on all of them. Last known, the State has over 600 contaminated sites of varying types just in Pierce County. The majority of these fall under state accommodation of voluntary cleanup, so it's not unexpected that only a portion of these sites ever actually undergo voluntary cleanup. In addition, typical examples of non-UST contaminated sites include dry cleaners, spills from vehicles, above ground containers/drums, heavy-metals, poor housekeeping at auto repair facilities, auto accidents, etc.

For many contaminated sites, the extent of contamination and risk level is not well understood. UST sites under our local enforcement are not immune to this; even compliant sites have a hard time getting the full extent of the problem under control and understood. This is the nature of sub-surface issues, which are hard to investigate or gain access to for cleanup. Since we know that even surface pollution can reach the aquifer (see PFAS contamination discussed further down), underground storage tanks are an obvious additional unacceptable risk.

Environmental Racism:

On the above illustration, note the heavy saturation within South Tacoma compared to North or Central Tacoma or other neighborhoods. Such an issue is referred to as “Environmental Racism”, defined as disproportionate health, environmental and economic impacts on “fenceline” communities and especially those of color and/or low-income.

Pierce County Environmental Health

<https://www.tpchd.org/home/showpublisheddocument?id=776>

(Excerpts)

Low-income, minority, and tribal communities have historically borne a disproportionate share of environmental risks, and are more likely to live in areas with increased risks.

Low-income people and people of color are also more likely to have fewer resources and choices about what to eat, where to live and work, and be exposed to multiple hazards.

Unemployment, discrimination, and other stress may make adults and children more vulnerable to environmental hazards.

Who's most vulnerable?

- People living in low-income neighborhoods, communities of color and rural areas with limited geographical and financial access to healthy foods, grocery stores, parks, transportation options, and other resources.
- People who live, work, or go to school near major roads.
- Low-income individuals and communities with fewer resources to adapt to climate change.

TPCHD - vulnerable neighborhood maps

<https://www.tpchd.org/healthy-places/public-health-data/maps>

Age Group Population in the City of Tacoma Living Below Poverty by Census Tract

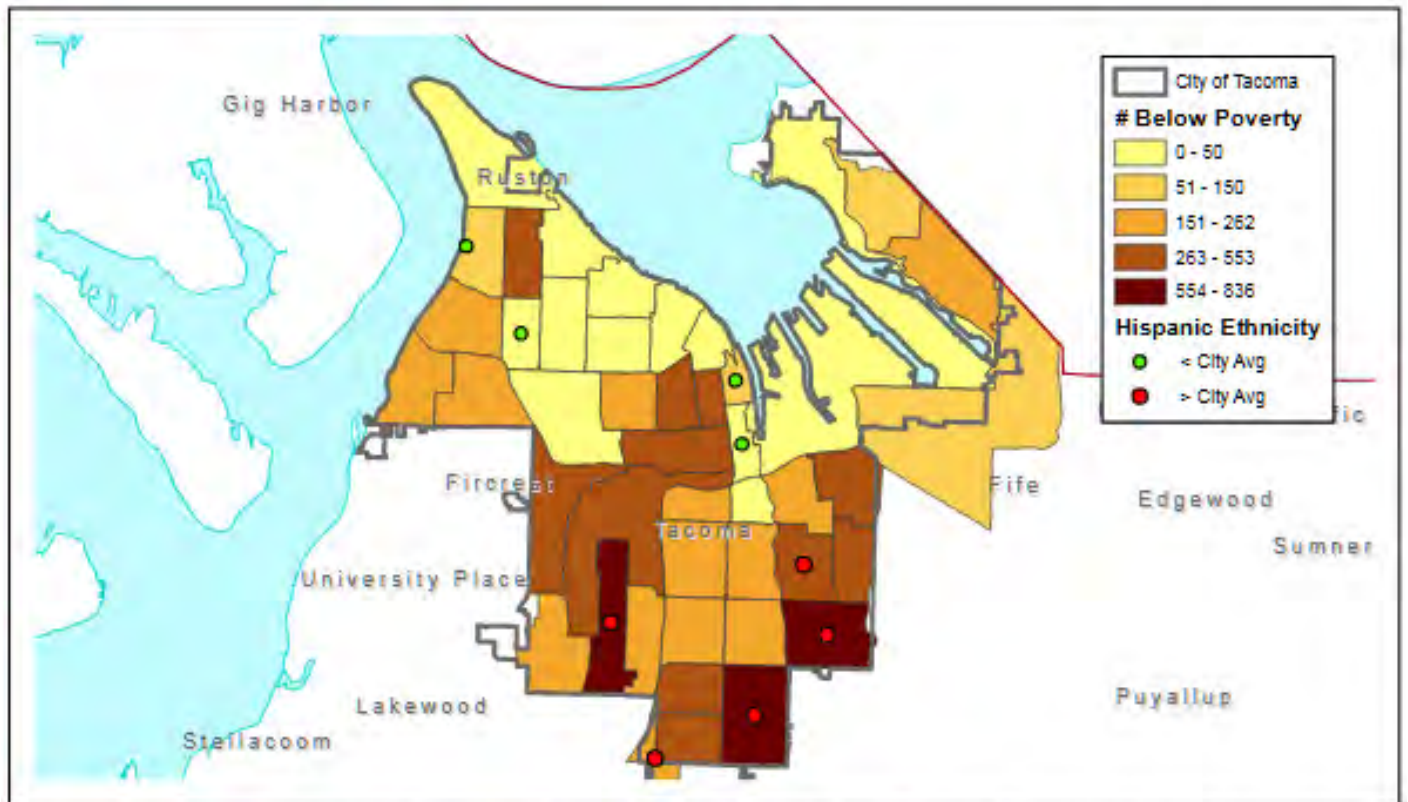
*Note: Mean Hispanic population for the City of Tacoma is 499. Standard deviation is +/- 359.
Census tracts marked with a green dot have a lower Hispanic population than the city mean minus 1 std dev.
Census Tracts marked with a red dot have a higher Hispanic population than the city mean plus 1 std dev*

Office of Assessment, Planning, & Improvement
(253) 798-7668



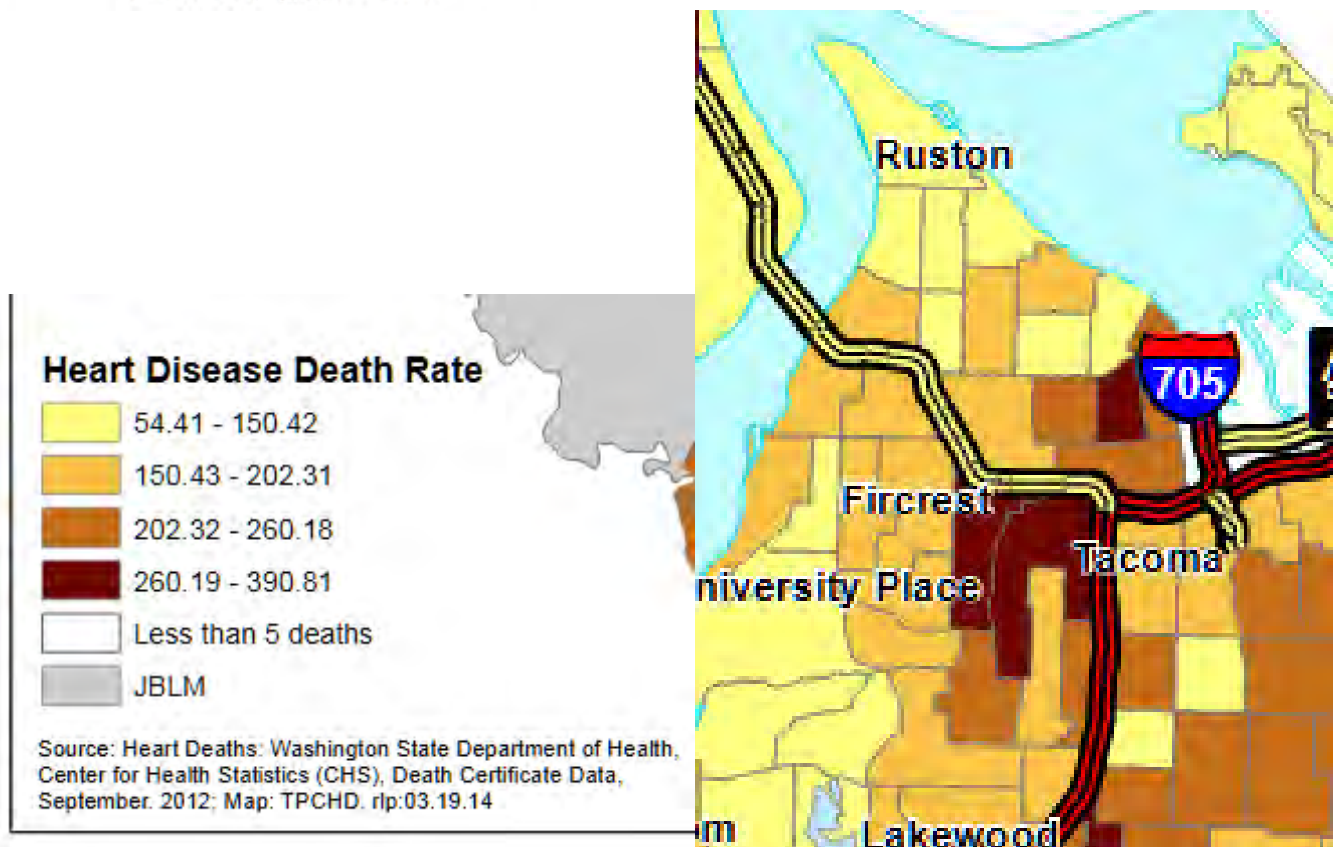
Source: Geography: U.S. Census Bureau 2010, Pierce County GIS;
Poverty Estimates: ACS 5 year Detailed Tables 2006-2010;
Map: Tacoma-Pierce County Health Department: 05.17.2012:rlp

The map features are approximate and are intended only to provide an indication of said feature. Additional areas that have not been mapped may be present. This is not a survey. Orthophotos and other data may not align. The County assumes no liability for variations ascertained by actual survey. ALL DATA IS EXPRESSLY PROVIDED 'AS IS' AND 'WITH ALL FAULTS'. The County makes no warranty of fitness for a particular purpose.

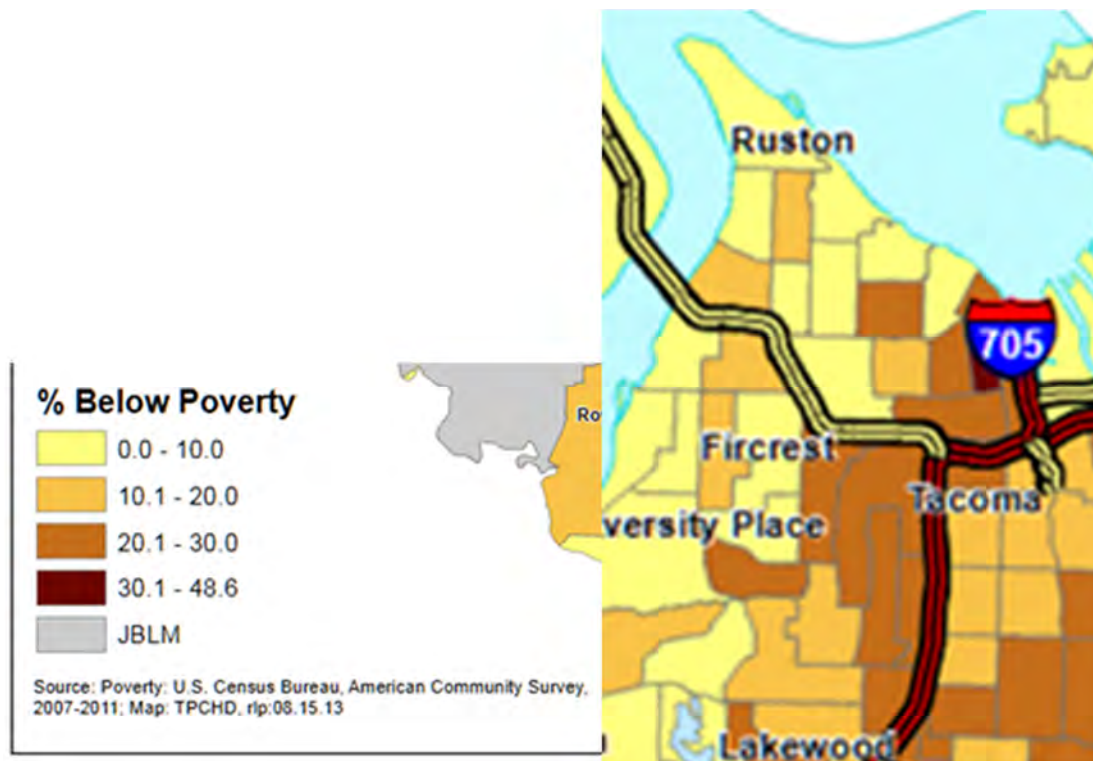


Number of Persons Ages 0-17 Living Below Federal Poverty Level

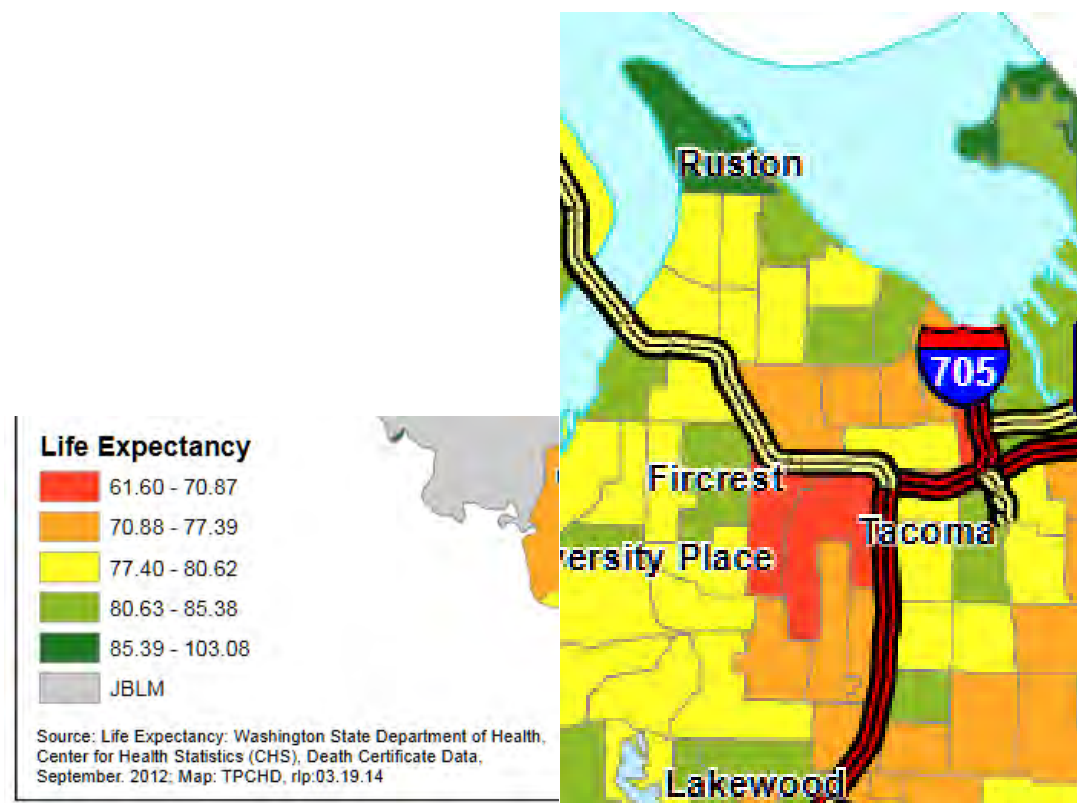
Heart Disease Death Rate by Census Tract
Pierce County, 2009 - 2011



Percent Population Below Federal Poverty Level
by Census Tract, Pierce County, 2007 - 2011



Life Expectancy at Birth by Census Tract
Pierce County, 2011



A city presenter recently spoke of limiting high-density housing near “risky” businesses for minimizing negative impacts to "avoid high-risk situations first" so as not to "jump to compensation" – based on the maps, above, South Tacoma would be the last place to consider high-density in-fill housing, then, until our history of heavily-polluting industry in the area has changed.

Since the city continues offering incentives for developers to build multi-family housing in South Tacoma, we should also be creating incentives to bring clean, eco-minded businesses where people can walk and bike to an eco-industrial park from the many housing in-fill projects currently being built in the Mall Subarea multi-family blocks.

This approach would be more in-line with the city’s Climate Justice Action Plan which encourages being proactive and listening to residents and contemporary scientists and residents, not taking action solely for those few self-promoting voices looking to profit in the short-term. It’s time to instead guide the way for sustainable long-term and more healthy economic successes.

For the sake of future generations, going forward, our goal must be to prevent allowing businesses with any potential contamination possibilities, to no longer need constant monitoring and costly clean up, to reduce health risks and better protect our environment.

***“... it's more economical in the long run
to offer clean incentives
than the cost of correcting
environmental/health issues later.”***

- Climate Justice Action Plan, Tacoma

3. Policy Review –

The One Tacoma Comprehensive Plan, in reference to South Tacoma, focuses on business and social activity, commercial, recreational and residential concentration near employment (2-29/40)... not heavily-polluting industry.

Reference to the aquifer and its protection (4-38/1-1) are in conflict with the Manufacturing Industrial Center (1-2) and green space expectations (1-3).

Action is specifically noted (E-7) for the TPCHD to revise the Tacoma Municipal Code regarding requirements and infiltration of the groundwater aquifer (C-11).

In addition to protecting our ground water, we must also consider air pollution, noise pollution, increased industrial traffic which very much affects a community made up of residents, schools, businesses and recreational areas and deserves better than having heavily-polluting industry allowed nearby.

Urban Form (1-14/27) speaks to improved nature, environmental-minded approaches to cleaner stormwater run-off, new parks and open spaces, more tree cover for improved water and air quality as well as expanded urban wildlife to increase quality of life, better health and property values.

This portion also speaks of “transitions” between housing and the South Tacoma Manufacturing Industrial Center (ST-M/IC) (1-22), yet South Tacoma’s overall air quality and mortality rates are the worst in the city.

Permit notifications of 2500 ft is not adequate and does not reach everyone who would be affected by potential groundwater, air and noise/traffic pollution.

The proposed Tideflats Industrial Land Use Regulations are not consistent with the One Tacoma Comprehensive Plan, nor the Tacoma Environmental and Climate Justice Action Plans when including South Tacoma community in with that heavy industrial zoning.

Potentially contaminating industry should no longer be allowed to establish itself in South Tacoma within the groundwater/aquifer recharge areas, and so near to our residential, school and recreational districts, keeping in line with the Tacoma Municipal Code, Environmental Action Plan and Climate Justice Action Plan.

The way to avoid constant monitoring of possible contamination and after-the-fact (if ever) clean-up, is to better eliminate any possibility of such polluting activity, with additional protections and clean business incentives.

Proposal for prohibiting the following:

- No Metal Recycling/Metal Shredding/Auto-Crushing
(as well as no expansions of current facilities) anywhere within city-limits
but especially within the South Tacoma Groundwater Protection District (STGPD)
and aquifer recharge areas.
- No new above-nor-below ground hazardous substance tanks or storage within
the STGPD and aquifer recharge areas.
- No new polluting industrial/manufacturing within the STGPD and aquifer recharge areas (for
promotion of proposed South Tacoma Economic Green Zone).

Suggested updates to the Tacoma Municipal Code, regarding prohibited uses in the South Tacoma Groundwater protection district.

D. South Tacoma Groundwater Protection District.

5. Prohibited uses.

a. The following “high-impact” uses of land shall hereafter be prohibited from locating within the boundaries of the South Tacoma Groundwater Protection District. Exceptions will be considered by Planning and Development Services, in consultation with the TPCHD, only upon conclusive demonstration that the high-impact use will result in no greater threat to the groundwater resource than that posed by a compliant nonprohibited use.

- (1) Chemical manufacture and reprocessing.
- (2) Creosote/asphalt manufacture or treatment.
- (3) Electroplating activities.
- (4) Manufacture of Class 1A or 1B flammable liquids as defined in the Fire Code.
- (5) Petroleum and petroleum products refinery, including reprocessing.
- (6) Wood products preserving.
- (7) Hazardous waste treatment, storage, or disposal facilities. (“Designated Facility” per Ecology’s Chapter 173-303 WAC et seq.).

(8) Metal Recycling / Metal Shredding / Auto Crushing

b. The Director of Planning and Development Services, or his or her designee, shall consult the North American Industry Classification System (“NAICS”) Manual for assistance in reviewing and making use interpretations pursuant to this subsection.

c. The above high impact uses should be periodically revised, updated, and amended, as appropriate, by Planning and Development Services or its successor agency in consultation with the TPCHD in order to take into account other potential high impact uses or improvements in technology, pollution control, and management.

d. Permanent or temporary storage of hazardous substances on sites with pervious surfaces, the disposal of hazardous substances, and the disposal of solid waste is prohibited, unless such discharge or disposal is specifically in accordance with a valid discharge permit, is approved for discharge into the City’s municipal wastewater system pursuant to Chapter 12.08 of the Tacoma Municipal Code as may be amended from time to time or is conducted in compliance with the requirements of a solid waste handling permit issued by the TPCHD.

In addition to the #8 added (in red), we need to confirm no expansion to existing businesses of any of items listed.

Regarding the yellow highlighted areas, please note that although these prohibitions are to be “periodically” reviewed for revision, they do not seem to have been for decades.

Strike-out area: Zero allowance for storage of hazardous substances, and zero tolerance plus significant consequences for contamination should be the requirement going forward.

***“Preventing contamination is
far less expensive than
cleaning up contaminated groundwater.”***

- WA Department of Ecology

- **Prohibit Metal Recycling/Metal Shredding/Auto-Crushing**

In 2019, Tacoma allowed a metal recycling/auto-crushing facility to build directly above our aquifer, not far from an outdoor recreational center. Auto-crushing requires the draining/storage/disposal of the very liquids on the Tacoma-Pierce County Health Department's list of prohibited contaminants:

Prevent infiltration and contamination

Infiltration within the STGPD.

Pollution occurs when water picks up contaminants along the ground surface. Polluted water can reach the drinking water aquifer. Some common contaminants include:

- Auto fluids.
- Sediment.
- Metals.
- Soaps and degreasers.

<https://www.tpchd.org/healthy-places/waste-management/business-pollution-prevention/south-tacoma-groundwater-protection-district>

In addition to concern of liquids and heavy-metals (contaminating soil, storm water run-off and groundwater), auto-crushing methods add to noise and especially air pollution through microplastics and glass dust. Broken auto glass and plastic are often found along the roads and surrounding areas of such sites. When left to weather and degrade in UV light, these plastic and glass fragments are also being run-over, creating smaller and smaller and more dangerous shards and microparticles. These microparticles become another environmental concern, as eventually smaller and smaller particles enter the air and groundwater, are ingested by people and wildlife, plus inhaled after becoming airborne during auto-crushing (which is now understood as a serious health hazard but only beginning to be researched regarding the damage caused to lungs, especially in children).

Articles regarding microplastics in air to be inhaled, and may also enter water to be ingested:

<https://www.nytimes.com/2019/04/18/science/what-are-microplastics.html>

<https://www.nationalgeographic.com/environment/2019/04/microplastics-pollution-falls-from-air-even-mountains/>

<https://time.com/5601359/microplastics-in-food-air/>

<https://www.theguardian.com/environment/2019/aug/14/microplastics-found-at-profuse-levels-in-snow-from-arctic-to-alps-contamination>

<https://www.theatlantic.com/science/archive/2019/08/microplastic-air-pollution-real/596119/>

These obviously serious health risks (of tiny glass dust/shards produced during the auto-crushing from both glass and fiberglass, now being identified in lungs and bloodstreams) are still being studied.

This permitted South Tacoma facility had initially reported that their planned method of dust control would be to continually hose-down / spray water which will surely result in more uncontrolled water run-off and contamination, and create more of an opportunity to pollute soil above and seep into the ground above the aquifer and aquifer recharge zones (where there is high permeability, resulting in rapid infiltration to the groundwater where this facility was allowed to locate directly above) – or – create toxic stormwater runoff into our streams and bay.

Other countries have instead turned to “dismantling” (not crushing) techniques which better separate recycling and control hazardous liquids. It should be no longer acceptable to simply attempt to reduce and/or later clean-up costly spills and leaks of toxic substances from these outdated methods; such potential hazards should be prohibited from within the STGPD and aquifer recharge areas all together.

Supporting sources:

Danger in air near metal recyclers - HoustonChronicle.com

Dec 29, 2012 - A single Houston recycler, Texas Port *Recycling* in the Manchester ... and dangerous source of air pollution: metal recyclers and *car crushers*, ... latter a *risk* 600 times higher than what is acceptable to federal *health* scientists.

<https://www.houstonchronicle.com/news/houston-texas/houston/article/Danger-in-air-near-metalrecyclers-4154951.php>

Crushing Cars Is a Loud, Smelly Business That's Terrible for Air ...

Oct 17, 2018 - *Crushing Cars* Is a Loud, Smelly Business That's Terrible for Air Quality attorney at NRDC who works on air quality and community *issues*, says even if General Iron ... It's hard, sharp, and potentially a public *health* concern.

<https://www.nrdc.org/stories/crushing-cars-loud-smelly-business-thats-terrible-air-quality>

Removing Mercury Switches from Vehicles

Methylmercury is a persistent, toxic contaminant that bioaccumulates in the tissues of fish. Relatively low concentrations of mercury in fish pose serious health risks to people and wildlife that consume them. Anthropogenic mercury emissions enter water bodies, either directly or through deposition from the air and, through biological processes, transform into methylmercury, which enters the aquatic food chain... mercury can be released into the air, soil and water during crushing...

http://www.4cleanair.org/ECOS_QC_Mercury_LR.pdf

Other cities have recognized the need for significant regulations and oversight of existing facilities or have had the foresight to completely prohibit them.

American Planning Association

<https://www.planning.org/pas/reports/report201.htm>

A number of local governments have completely excluded wrecking and processing yards from their jurisdictions. Interest in this approach is bound to be stimulated by *Oregon City v. Hartke*,⁹ the recent case in which the Supreme Court of Oregon upheld such an exclusion. The court decided that the city was entitled to make a distinction between wrecking yards and other uses that were claimed to have similar characteristics.

The city commission may have felt that the operation of an automobile wrecking yard would produce more noise, smoke or fumes and would be more unsightly than the permitted uses.

The court further concluded that the city could exclude a business solely on the ground that it was "offensive to aesthetic sensibilities."

The prevention of unsightliness by wholly precluding a particular use within the city may inhibit the economic growth of the city or frustrate the desire of someone who wishes to make the proscribed use, but the inhabitants of the city have the right to forego the economic gain and the person whose business plans are frustrated is not entitled to have his interest weighed more heavily than the predominant interest of others in the community.

In an effort to cope with the health hazards of wrecking and processing yards, New Haven, Connecticut, has included the following regulation in the zoning ordinance:

All materials shall be stored in such a manner as to prevent the breeding or harboring of rats, insects, or other vermin. Where necessary, this shall be accomplished by enclosures in containers, raising of materials above ground, separation of types of material preventing the collection of stagnant water, extermination procedures, or other means.

This was the best outlook of what would be going into the soil even after filtering / treatment:

STORMCEPTOR STC

PERFORMANCE TESTING RESULTS

- **COVENTRY UNIVERSITY – FULL SCALE TESTING:**
 - 97.8% OIL REMOVAL
 - 83% INORGANIC SEDIMENT REMOVAL
 - 73% ORGANIC PARTICLE REMOVAL
- **FIELD MONITORING - SEATTLE, WA**
 - 87% TOTAL SUSPENDED SOILDS (TSS) REMOVAL
 - 99% TOTAL PETROLEUM HYDROCARBONS (TPH) REMOVAL
- **FIELD MONITORING – WESTWOOD, MA**
 - 93% TSS REMOVAL
 - 82% TPH REMOVAL
- **FIELD MONITORING – COMO PARK, MN**
 - 76% TSS REMOVAL
 - 65% TOTAL KJELDAHL NITROGEN (TKN) REMOVAL
 - 32% TPH REMOVAL

From a 2019 presentation to the city created by Huitt-Zollars, indicating that water “treatments” are nowhere near 100% (some as ineffective as leaving more than half the toxins still in the “treated” water which would then be put into a swale to contaminate the ground directly above our drinking water before entering a “perforated pipe”).

This is counter-productive to “protecting” our aquifer.

Such contaminants build-up over time, so (since 100% “treatment” results seem unobtainable) any business allowed to operate within STGPD/aquifer recharge areas should have zero run-off/containments. Tacoma has had a history of failing to follow protective covenants (neglecting to include EPA involvement), and spot-monitoring only discovers issues after-the-fact. So the best solution would be to prohibit any possible polluting at all in the STGPD and aquifer recharge areas, going forward.

Regarding metal shredding, although not currently done in South Tacoma (as far as I know) Tacoma has experienced a history of fires and contamination where shredding is allowed. This practice presents an additional level of hazard, so metal shredding must never be allowed within the STGPD or aquifer recharge areas, preferably prohibiting any new/expanded shredding from anywhere within city limits.

It is not an exaggeration to state that people exposed to these toxins are dying; workers, first responders and nearby residents. A recent and tragic example, demonstrating the toxicity of such sites, is this story of a WA State Trooper who investigated wrecking yards / scrap processors and hulk haulers during her career.

Washington state trooper's death was caused by toxic chemicals, officials say

<https://www.seattletimes.com/seattle-news/washington-state-troopers-death-linked-to-toxic-on-the-job-exposure/>

Feb. 15, 2021 at 6:26 am Updated Feb. 16, 2021 at 7:13 pm

By The Associated Press

OLYMPIA — A Washington state trooper's 2018 death has been reclassified as occurring in the line of duty after an investigation determined the cause of her fatal cancer was exposure to toxic chemicals during an illegal auto-wrecking investigation.

Trooper S. Renee Padgett was 50 when she died on Sept. 4, 2018, after a long battle with cancer, according to a Washington State Patrol (WSP) news release.



Officials: state trooper's death caused by toxic chemicals | Tacoma News Tribune

Trooper S. Renee Padgett was a trooper for 27 years, working first in Gig Harbor as a trooper cadet, then in Bellevue after completing her basic training. Courtesy of the Washington State Patrol ...

www.thenewstribune.com

Besides clean/green incentives, there must be strict penalties for non-compliance such as is part of this Vermont final ruling for salvage yards regarding minimum/maximum material removal and immediate cessation of operation:

<https://dec.vermont.gov/sites/dec/files/documents/SalvageYardRuleFinalAdopted-09-01-2015.pdf>

Finding of harm; threat of harm. If the Secretary determines that immediate suspension or revocation of a salvage yard permit is necessary to prevent actual substantial harm or an imminent and substantial threat of harm to the public health, public safety, or the environment under subdivision (e)(3)(F) of this section, the suspension or revocation shall become effective upon the receipt of the Secretary's notice under subdivision (e)(4) of this section. The suspension or revocation shall be effective until any requested hearing has been completed and a final decision issued by the Secretary._

Even if the currently allowed car-crushing/metal recycling facility is meeting minimum requirements (which we have yet to discover), those standards are still unacceptable and shortsighted. What is being presently allowed-for presumes the toxic fluids in swales will never reach the groundwater, but that doesn't take into consideration what may happen in an earthquake. It doesn't consider what may happen if Mt. Rainier erupts and cuts off our other water supply from rivers. It's time to re-evaluate and only allow for companies with zero-chance of contamination within the protection district.

Current "protections" are not impenetrable. To our south, Lakewood is currently suing the Department of Defense for Per-and-polyfluoroalkyl substances (PFAS) contamination which has since also reached South Tacoma (well 10-A) resulting in our residents' only non-fluoridated water source no longer being available for consumption.

Per- and polyfluoroalkyl substances (PFAS)

<https://www.cnn.com/2019/02/14/health/what-are-pfas-chemicals>

A growing body of science has found that there are potential adverse health impacts associated with PFAS exposure, including liver damage, thyroid disease, decreased fertility, high cholesterol, obesity, hormone suppression and cancer. These chemicals can easily migrate into the air, dust, food, soil and water.

<https://www.atsdr.cdc.gov/pfas/health-effects/exposure.html>

- Drinking contaminated municipal water or private well water
- Eating fish caught from water contaminated by PFAS (PFOS, in particular)
- Accidentally swallowing contaminated soil or dust
- Eating food that was packaged in material that contains PFAS

Research has suggested that exposure to PFOA and PFOS from today's consumer products is usually low, especially when compared to exposures to contaminated drinking water.

Just as we see the infiltration of permanent and forever toxins from outside of the GWPD boundaries, the need to protect our surface water runoff is just as critical as an outflow as well. The majority of surface runoff from South Tacoma exits to the south and west, to Chamber bay and Lakewood Water District. External groups have worked diligently to clean up a salmon stream and wildlife refuge. We must take full responsibility and accountability for our contribution to the load of runoff chemicals, to prevent any possibility Tacoma could be sued for failing to abide by either existent protective code or purposeful neglect of best science.

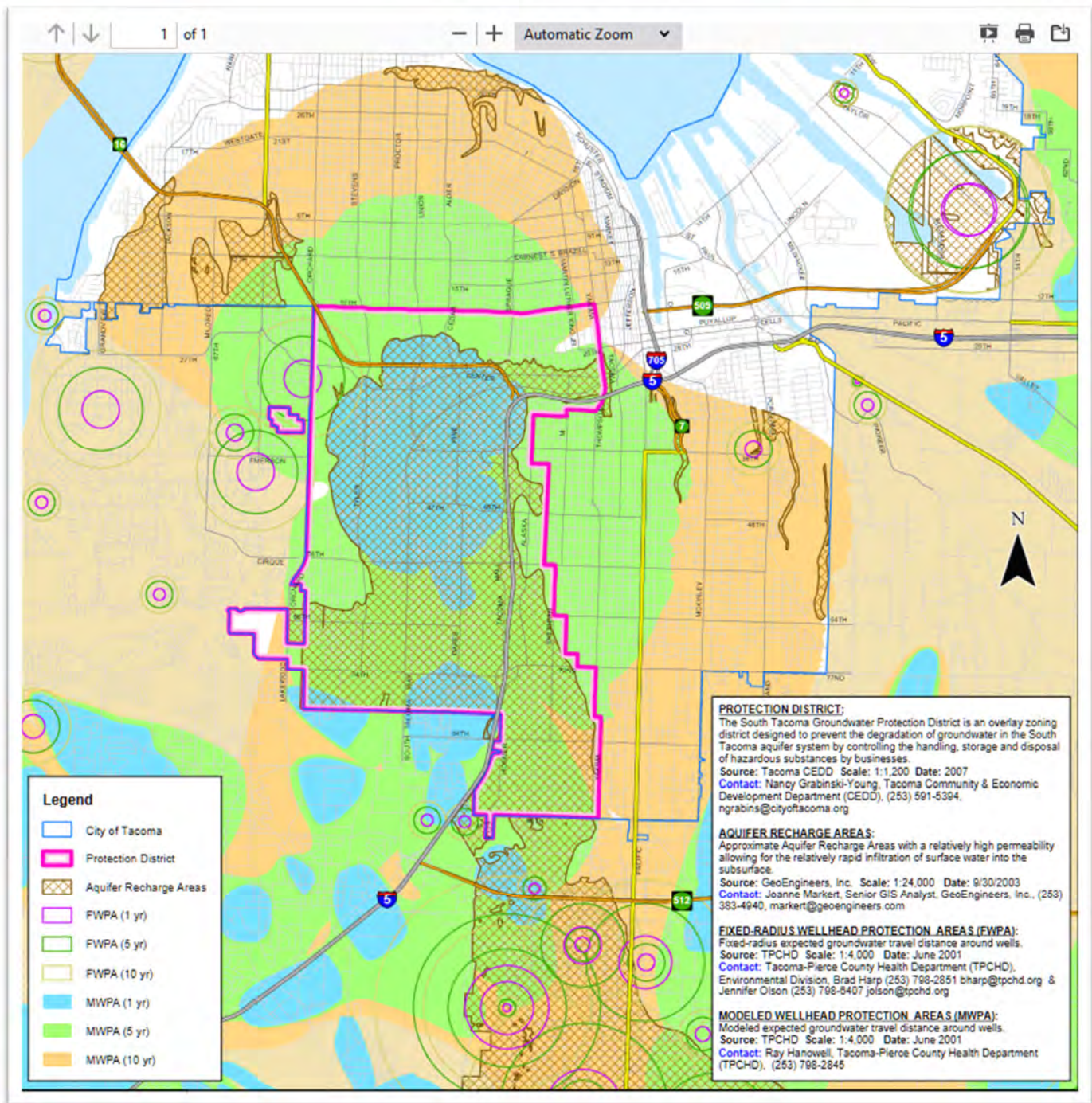
At the March 24, 2021 Infrastructure Planning and Sustainability meeting, the Tacoma Pierce County Health Department (TPCHD) informed us of another recent contamination discovery (petrochemicals) within South Tacoma. Instead of having to manage more superfund sites within the STGPD, we should do everything we can to no longer create them by only allowing practices within STGPD and aquifer recharge areas which pose zero possibility of soil contamination.

As one speaker put it in recent public comments, it's time for Tacoma to "think ahead" – this is no longer the 1950s when the heavy industrial zoning codes were put into place, and when industrialization and economy preempted everything, even personal health. We now know better and have this chance to remove even the remote possibilities of potentially polluting contaminants anywhere near our protected groundwater aquifer and recharge areas.

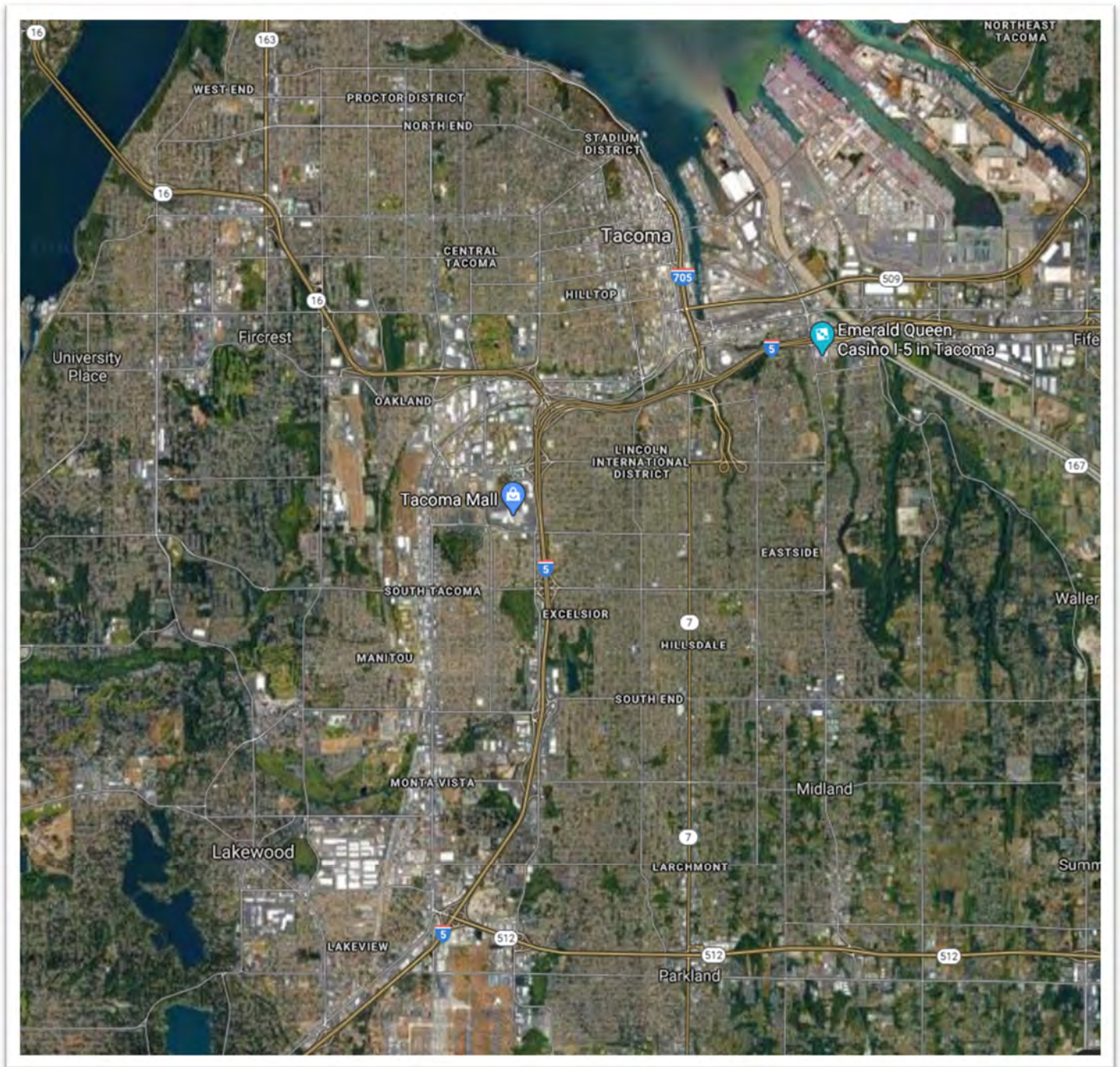
- No new above-or-below ground hazardous substance tanks or storage within the South Tacoma Groundwater Protection District (STGPD).

The city has already been supplied information on this topic (via multiple submissions from other residents / organizations during the Tideflats & Industrial Land Use Regulations process) to reduce pollution, environmental/health hazards and costly clean-up; so, this section will illustrate further the STGPD and aquifer-recharge areas which require different/better protections and to fit into our Economic Green Zone proposal.

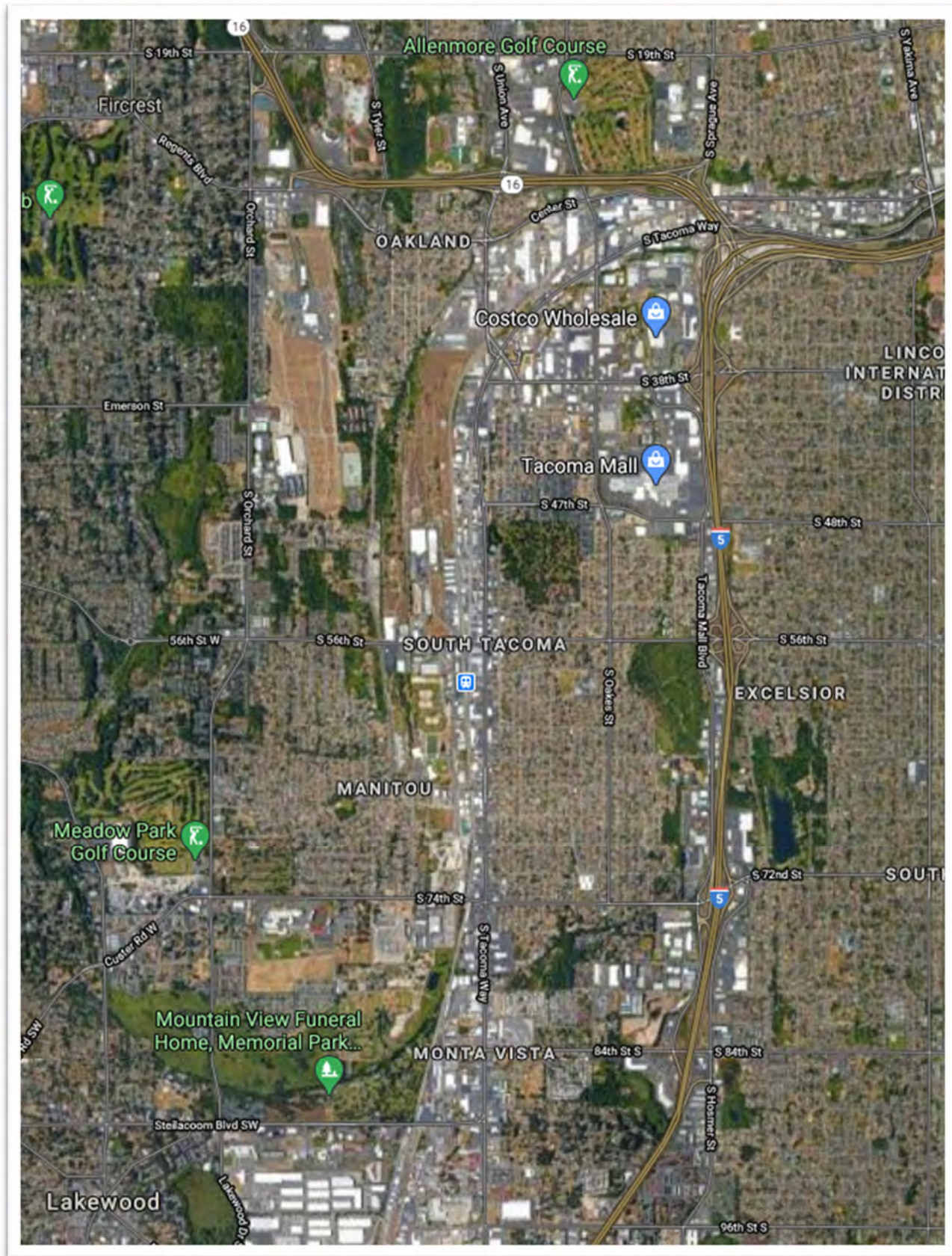
https://cms.cityoftacoma.org/Planning/Shoreline/Maps/10_Aquifer.pdf



Satellite view of same area, to show developed land versus undeveloped, and the few open-space green areas left for our care and consideration:

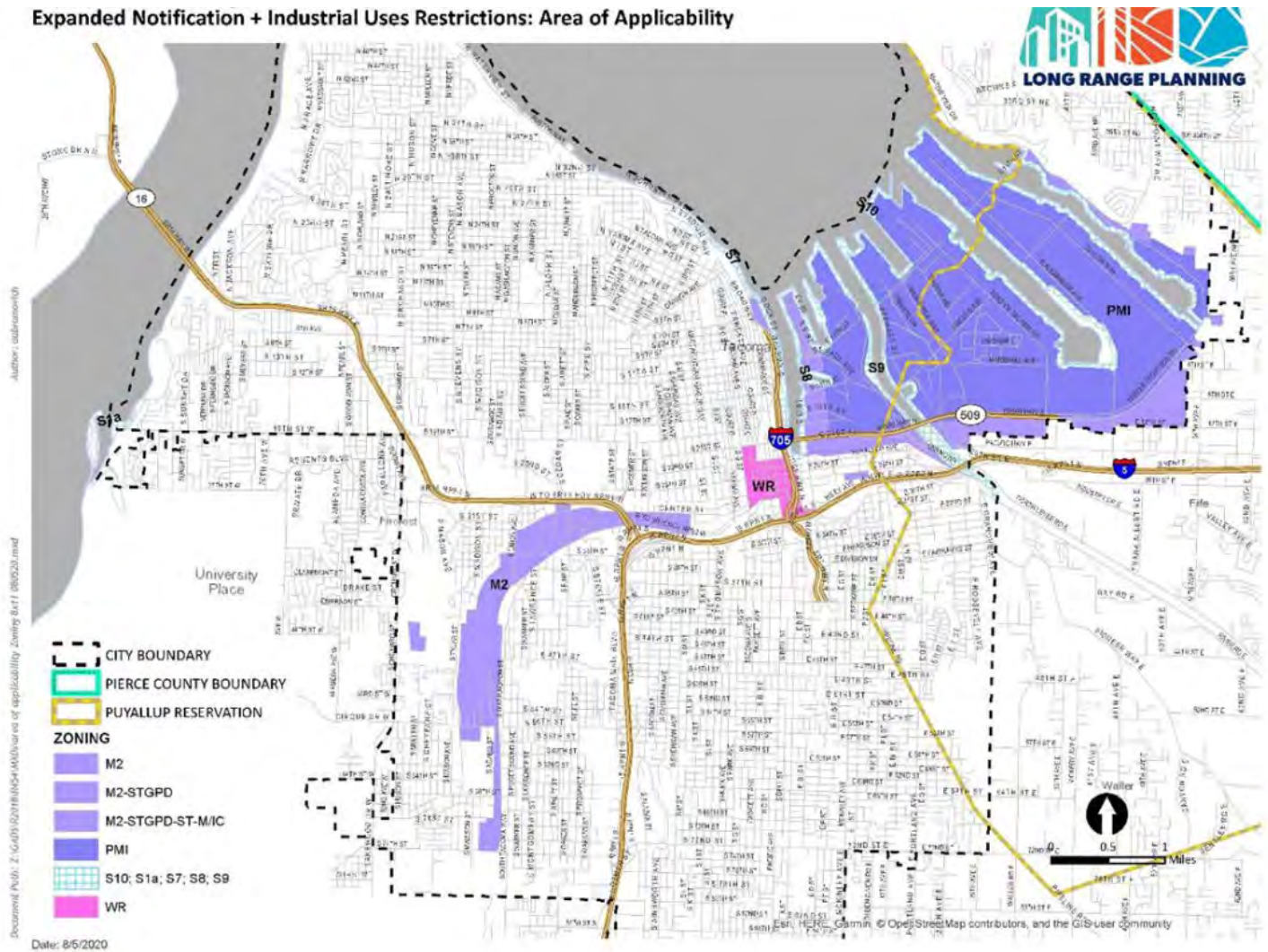


Closer view of the groundwater protection district. Note very little undeveloped land left (not counting the Tacoma Landfill) within the STGPD, yet much is currently specifically zoned as M2 (ST-M/IC) instead of more proactively protective.



Current Planning Department's proposed Non-Interim Land Use:

Expanded Notification + Industrial Uses Restrictions: Area of Applicability



Side by side comparison of those images, illustrating the heavy industry zoning directly over the STGPD and the remaining undeveloped land we still have a chance to change direction for future environmental improvement:



Water will be the most critically important element of the future, and we must protect this essential resource.

It's not enough to hope that the contaminants above the aquifer will never reach the ground water. Although the city seems to be preparing for sea-level rise along the shoreline, in addition we must acknowledge that climate change can also affect groundwater.

As sea levels rise, this won't only affect just shorelines but may seep underground for a mile or so inland causing groundwater to rise and push into contaminated soil becoming contaminated itself plus releasing toxins into the air. So, despite the remedial action taken, we cannot assume contamination may always be safely "contained" in the soil above (simply hoping that infiltration will never go so deep, nor that groundwater could ever reach so high).

<https://www.npr.org/2021/02/08/963673676/near-coasts-rising-seas-could-also-push-up-long-buried-toxic-contamination>



Near Coasts, Rising Seas Could Also Push Up Long-Buried Toxic Contamination : NPR

Near Coasts, Rising Seas Could Also Push Up Long-Buried Toxic Contamination Along some coastlines toxic contamination could seep into basements or broken sewage lines in coming years. In ...

www.npr.org

The change to preclude heavily-polluting industry in the STPGD/aquifer recharge areas and promote more tree canopy cover would help protect the aquifer as well as provide better air quality and possible green space for the many 3-4 story multi-family apartment buildings (currently permitted and in the process of development) within the Tacoma Mall Subarea region (directly to the east of the ST-M/IC), as well as becoming more in-line with the Tacoma Environmental Act, Climate Justice Action Plan and Urban Tree Canopy programs.

Failure to acknowledge and begin addressing this issue now may well result in a situation such as is currently occurring in Flint, MI where former elected officials are being charged for their poorly thought-through choices, neglect to act and for the resulting harm to residents.

Michigan plans to charge ex-Gov. Snyder in Flint water probe

FILE - In this March 21, 2016, file photo, the Flint Water Plant water tower is seen in Flint, Mich. Former Michigan Gov. Rick Snyder, Nick Lyon, former director of the Michigan Department of Health and Human Services, and other ex-officials have been told they're being charged after a new investigation of the Flint water scandal, which devastated the majority Black city with lead-contaminated ...

[apnews.com / https://apnews.com/article/flint-lead-water-crisis-gov-rick-snyder-801ba227340f0ac2e10e37a06a82f08d](https://apnews.com/article/flint-lead-water-crisis-gov-rick-snyder-801ba227340f0ac2e10e37a06a82f08d)

South Tacoma already has some of the highest air pollution levels and mortality rates, yet appears intended for even more heavily-polluting industry and high-density in-fill housing. Inviting only heavily-polluting industry to ST-M/IC would bring more noise, air pollution, large vehicle congestion and possible water contamination -- all of which would be detrimental to the health and quality-of-life for current and future residents.

Quote from Sept. 14, 2019, TNT:

Clousing pointed out that the South End has a history of health disparities compared to other parts of Tacoma. A Washington State Department of Health map shows high levels of diesel emissions and other health risks in the South End compared to northern areas of Tacoma.

<https://www.thenewstribune.com/news/local/article234895557.html>

Eventually, for all open undeveloped land directly above the groundwater aquifer, efforts should be taken to best allow for natural saturation through uncontaminated and native plant filtering ground layers, instead of redirecting precious fresh water away, down greywater pipes and storm drains either to wastewater or polluting the ocean.

It's time South Tacoma received adequate acknowledgement for improvements. South Tacoma is a community, not the industrial port; so, inviting more heavily-polluting industry within such close proximity is a community health issue which could easily become a crisis which we must take steps now to avoid.

***“We have learned that it is much easier
and less expensive to protect aquifers
from pollution and harmful development
than to find new water supplies or
restore ground water quality after
it has been contaminated.”***

- U. S. Environmental Protection Agency

- **Prohibit further heavily-polluting industry in STGPD and aquifer recharge areas to promote Eco-Industrial Parks / Economic Green-Zones**

Ideally the city should be actively working to obtain all remaining undeveloped land within the STGPD and aquifer recharge areas to preserve as green space, for the future protection of our water supply. Second to that, we should be implementing incentives for the owners/occupants to that extent as much as possible.

The concept of an Economic Green Zone is to attract not only businesses which have no chance of a spills/leaks and other harmful polluting which could contaminate our air, ground or water in any way, but to also entice businesses which manufacture products and/or provide services for the betterment of our more environmentally sustainable future.

We propose additional protections in the overlay above/within STGPD and aquifer recharge areas (still complying with all requirements of the environmental covenant). So, for the heavy industrial businesses in the ST-M/IC currently operating, we must 1) be more vigilant about monitoring, and 2) prohibit any new expansion of heavily-polluting industry/manufacturing in this area going forward (any current heavy industry/manufacturing could be grandfathered-in but with the agreement of no future expansion). All other businesses anywhere within the STGPD/aquifer recharge areas would be henceforth held to non-polluting industry/commercial/recreational and/or designated undeveloped green zones, also with no expansion of polluting industry allowed.

The Tideflats and Industrial Land Use Regulations proposal limits businesses within the ST-M/IC to only heavy industry while the "Home in Tacoma" proposes more high-density "affordable" housing within the city's most-polluted area. Not only is this an unfair form of discrimination against the city's lower-income demographic, but it also prohibits numerous non-polluting business options.

Many of the proposed restricted businesses/facilities are the very ones we would actually like to see promoted to come to South Tacoma, not be limited. Restrictions should instead be with the intent of reducing heavily-polluting industry farther away from our homes, schools and recreational areas, and especially away from the STGPD/aquifer recharge areas.

This wouldn't be limiting all industry (even not all heavy industry), it would instead be allowing for more of the right non-polluting kind. For example, currently Pierce County is one of the only counties which doesn't have a horse arena which is a multi-million dollar domain which these proposed regulations would prohibit, while promoting polluting industry instead.

Another example of an up-coming/booming business is industrial hemp, which is not only becoming the future replacement of hardwood but it also improves the land it is cultivated on.

Hemp is the New Oak: America's First Hemp "Wood" Factory is Being Built

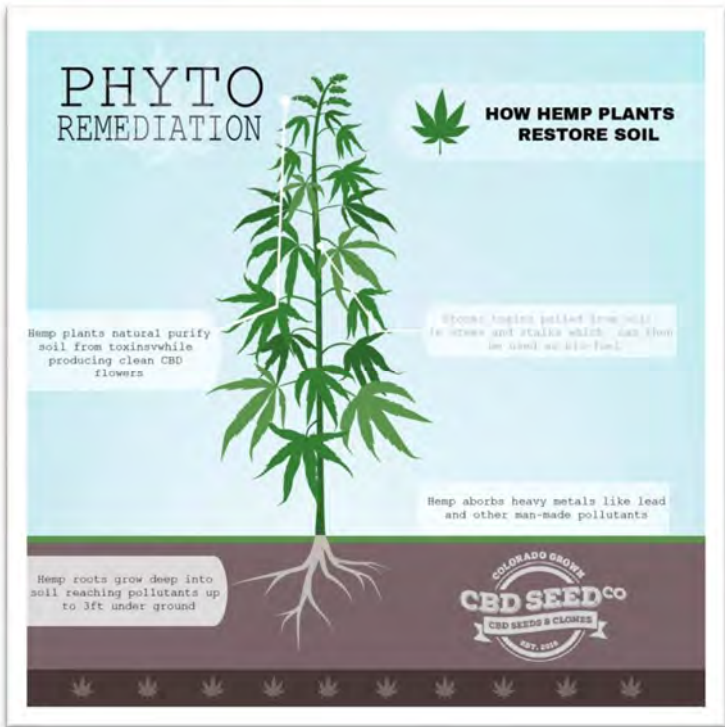
<https://returntonow.net/2019/04/14/americas-first-hemp-wood-factory-is-being-built/>

"HempWood" is 20 percent harder than oak, and grows 100 times as fast. It's a sustainable alternative for hardwood furniture, flooring and more... HempWood will be used to make blocks, boards, flooring, cutting boards and skateboards, all at prices far cheaper than oak, the company said.

Hemp is a non-psychoactive crop which would be beneficial to have planted anywhere there is contaminated soil (which is truly most of Tacoma, due to the Arsarco smelter contamination) with the condition of no pesticide/herbicide usage allowed.

One example of hemp plants used to clean-up toxic areas is in Chernobyl, through the plant's process of "phytoremediation" by penetrating deep into the soil and absorbing both harmful chemicals and rich nutrients. The hemp plants store the toxins in its stalks and stems, but the flowers remain clean. Recent studies have shown that when low-THC plants are used to remove toxic heavy-metals from the soil, the stress on the plant drives up CBD content with no measurable boost in psychoactive THC, thus produced a high demand CBD.

Full study here: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6715179/>



Hemp plants naturally purify soil by pulling man-made pollutants and heavy-metal toxins into the stalk, which can then be turned into bio-fuel or textile fiber or many other uses. The flowers, however, are free of toxins and THC, so can produce high quality CBD products.



4. Objectives –

The time has come for a broad review of South Tacoma, the ST-M/IC and STGPD/aquifer recharge area overlay districts, regarding potential environmental and health impacts of the area, and developing a clear vision to eliminate all possibilities to risks to groundwater and residents, with codes to promote a cleaner Eco-Industrial Green Zone concept.

This may be done in a number of ways, and we are open to explore them all. For this submission, it was recommended we lay out our vision for the city's planning experts to then assist with the specific policy and code changes which will best support this shift toward (and ultimately reaching) these goals while considering possible:

- Increased protection overlay enhancement of the STGPD and aquifer recharge areas for code, plan and/or land designation changes
- Subarea review of all South Tacoma, opening additional options

Example: South Tacoma Green Zoning Development Overlay

An additional protection layer, put into the city code, combining the aquifer protection district, tree canopy, and compatible industries in one comprehensive section. Instead of ever allowing for exceptions to protections, the Green Zone overlay would be a non-negotiable baseline, with credits and advantages given to qualifying businesses after they meet all of the Green Zone overlay controls such as measures in place to resist possible natural disaster catastrophic conditions.

Example: Businesses within the STGPD and aquifer recharge areas could opt to create a natural basin in exchange for various provisions of the Eco-Industry Economic Green Zone benefits. This would not be for holding hazardous substances (as is currently being done) but for improved clean stormwater management with natural basins doing more than just collecting water while also managing it from run-off, with the option to reward efforts taken to allow for natural saturation through undeveloped uncontaminated and naturally filtering ground layers, instead of redirecting fresh water away, down greywater pipes and storm drains either to waste or polluting the ocean.

Just as builders are able to select from a “palette” for exemptions/exceptions, the same concept could be applied to a different “green palette” for any business/development within the STGPD and aquifer recharge areas. Although there would be a firm requirement of no pollutant groundwater run off or storage within this protected zone, there could be options to preserve variations of open space such as is being done in Whitemarsh Township, PA where they have discovered that natural basins with un-mowed native plants and especially tall trees (which are the ultimate tool in stormwater management) are much more effective than mowed swales.

Whitemarsh Township Stormwater Management
<https://www.whitemarshwp.org/275/Stormwater-Management>

There are many resources available, as well as a passionate community ready to assist however possible. With collaborated efforts, South Tacoma has the potential to become a distinct and desirable business destination and manufacturing region unlike anywhere else in Washington state.

5. Community Outreach –

This has been a topic within our community for decades, but it was especially reignited in 2019 with the city's approval of a car crushing/metal recycling facility to be allowed directly over the STGPD not far from an outdoor recreational area. Then, with the recent casual inclusion of South Tacoma into proposed land-use regulations written primarily for the industrial Port of Tacoma, there have been additional discussions at the neighborhood and STNC board meetings, plus outreach to residents, area businesses, landowners and community organizations as well as conversations with TPCHD and Tacoma Police Department (TPD) specifically about concerns/issues due to the metal recycling facility (e.g. increased traffic hazards and congestion, metal/auto theft, a spontaneous street village nearby where the occupants rely on scrapping metal resulting in the subsequent inappropriate unregulated dismantling of vehicles and appliances on the side of the street).

Thus far, we have not met with any objections since we are not suggesting eliminating business, but instead promoting the concept of an Eco-Industrial Green Zone where new non-polluting business could get a foot-hold to "incubate" and clean businesses would desire to permanently establish within.

Examples of neighborhood council communications to the city:



Mayor Victoria Woodards
City Council of Tacoma
747 Market Street
Tacoma, WA. 98402

September 10, 2019

Dear Mayor Woodards and Tacoma City Council,

The South Tacoma Neighborhood Council is concerned regarding the current zoning of the South Tacoma Groundwater Protection District. The concern arose from the recent permit application by Sutter Metals Recycling Center to build an Auto Crushing & Metal Recycling Center at 5312 South Burlington Way.

The South Tacoma groundwater aquifer system serves as a significant source of drinking water for the City of Tacoma. It supplies approximately 40% of Tacoma's total water demand. This resource is important to the City of Tacoma.

The Neighborhood Council recently discovered the zoning of the South Tacoma Groundwater Protection District has been M-2 heavy Industrial since 1953.

The zoning is outdated and not conducive to the current changing times.

The Neighborhood Council is requesting the City Council consider initiating a rezone of the South Tacoma Groundwater Protection District from M-2 heavy Industrial. Please consider initiating an amendment to the comprehensive plan to change the zoning to protect Tacoma's groundwater supply.

Respectfully,

South Tacoma Neighborhood Council
board@southtacoma.us



1/27/2021

Mayor Victoria Woodards
City Council of Tacoma
747 Market Street
Tacoma, WA 98402

Mayor Woodards and the Tacoma City Council,

The South Tacoma Neighborhood Council is once again communicating our urgent request regarding the need for rezoning of land above and near the South Tacoma Groundwater Protection District. We had sent a similar letter on September 10, 2019 but received no action, much less even a reply.

Only recently, we learned the Planning Commission has now been tasked to "fast track" non-interim regulations which were primarily written for the Port of Tacoma tide-flats, yet those are also being applied to South Tacoma even though South Tacoma is vastly different than the heavy industrial port.

South Tacoma is a vibrant community made up of both historic homes and newer multi-family housing, recreational fields, school and business districts. South Tacoma's protected groundwater aquifer serves as a significant source of the city's drinking water, supplying up to forty percent of Tacoma's water demand. South Tacoma's history of railroad industry no longer reflects present day, and the M2 industrial zoning from 1953 is inappropriate and should have been recognized as outdated long ago.

Ironically, the ST-MIC proposes to restrict precisely the kind of non-industrial businesses we would like to welcome to South Tacoma, which CoT recognized as obviously incompatible with heavy industry. For example, the proposed regulations acknowledge that an assisted-living facility should not be near an M2 zone, while at the same time the city's "Home in Tacoma" project is proposing high-density housing in South Tacoma near the very areas the non-interim regulations are trying to retain as solely heavy industry.

South Tacoma needs to be removed from the Tide-flat Non-Interim Regulations, and the industrial zoning must be reviewed and changed. It is no longer acceptable to assume that South Tacoma may someday later get a closer look' as was suggested by the city staffer in a recent Planning Commission meeting. Now is the time to take the obvious action and give South Tacoma proper designation instead of allowing for continued high pollution levels contributing to the unbalanced early mortality rates occurring here (per TPCHD).

We envision a new approach, such as a "Green Zone" which could be realistically obtainable with progressive-minded enticements and rezoning to support economically and environmentally sustainable businesses, while preventing additional health hazards and prohibiting further threat or contamination to the aquifer.

We of the South Tacoma Neighborhood Council are once again formally requesting that this issue no longer go unnoticed, un-responded to and un-acted upon. We look forward to working with the city in determining the best new approach for South Tacoma; either as a separate interim-or-non-interim regulation specific to this area, or an amendment to the comprehensive plan for corrected rezoning, and/or your welcomed solutions to create a better future for South Tacoma which will also be for the betterment of our entire city.

Respectfully,
South Tacoma Neighborhood Council

CC: Tacoma City Council, Tacoma Planning Commission, Tacoma-Pierce County Health Department, Pierce County Council, All Tacoma Neighborhood Councils, Rep. Melanie Morgan, Rep. Steve Kirby, Sen. Steve Conway

PO Box 112136, Tacoma, WA 98411 - board@southtacoma.us



March 27, 2021

Tacoma Planning Department
747 Market Street
Tacoma, WA 98402

RE: Amendment Application Fee Waiver

At our monthly meeting on March 18, 2021, Board Members of the South Tacoma Neighborhood Council voted in unanimous support of submitting this Amendment Application to the Comprehensive Plan and Land Use Regulatory Code.

Thank you for the application fee-exemption of our Neighborhood Council submission due to this formal written confirmation of the STNC-Board's approval.

Respectfully,

Joe Bushnell - Chair
Phone: 253-792-1857
South Tacoma Neighborhood Council

PO Box 112136, Tacoma, WA 98411 • board@southtacoma.us

6. Supplemental Information to Proposal:

The Edison Eco-Industrial Center and Economic Green Zone



Goal: to attract non-polluting businesses – and -- entice the type of businesses with services or manufactured products for the betterment of our more environmentally sustainable future.

Eco-industrial park

https://en.wikipedia.org/wiki/Eco-industrial_park

An eco-industrial park (EIP) is an industrial park in which businesses cooperate with each other and with the local community in an attempt to reduce waste and pollution, efficiently share resources (such as information, materials, water, energy, infrastructure, and natural resources), and help achieve sustainable development, with the intention of increasing economic gains and improving environmental equality.

An example of multiple plans to assist municipalities with the development and implementation:

Green Zones

<https://www.cbcal.org/issues/green-zones/>

Picture a Green Zone as a community transformed—from a highly polluted, economically depressed neighborhood into a vibrant area with green business practices, a healthier environment and a stronger economic future... the Green Zone concept is an affirmative approach to reduce and prevent pollution—one that looks at the overall environmental and economic health of a community.

The definition of a Green Zone varies from community to community, but there is a common concept: A Green Zone designation provides a local framework to protect the environmental and economic health of a community heavily affected by local pollution. A Green Zone's boundaries could be defined by those of a particular area within a city where residents live with heavy concentrations of pollution.

In a Green Zone, you'll find:

- Land use policies that prevent new pollution projects from locating in these communities
- Support for businesses in the Green Zone that want to "green up" operations
- Greening these communities by creating more parks, community gardens and urban farms, and developing green businesses and jobs.

The Environmental Protection Agency endorsed the Green Zone concept at a forum at the White House in December 2010. The EPA expressed support for the Green Zone model to protect environmental and economic health, one that represents a new direction for the environmental justice movement.

This opens the door to more effective work in creating Green Zones in communities around the country to protect the environmental and economic health of low-income residents and communities of color.

Green Economic Zones as a Catalyst for Regional Sustainable Development

https://www.vivideconomics.com/wp-content/uploads/2019/08/Green-Economic-Zone_8bRZ.pdf

Green industrial clusters focus Economic Zone (EZ) activity on the production of green technologies and products necessary for a transition to green growth. The availability of green technologies, which promote efficient use of natural resources and emit fewer greenhouse gas, are instrumental in achieving the green transition. EZs which cluster green industries therefore contribute to both national and international green objectives. Green industrial clusters also provide spillovers to the wider economy, supporting the success of eco-industrial parks and low carbon zones. Examples of successful green clusters include Himin Solar Valley, China's largest geographic zone for the solar industry, and Atlantis Greentech SEZ, designated in South Africa for the manufacture of green technologies and provision of green services.

The Sustainable Development Code

<https://sustainablecitycode.org/brief/create-green-zones-2/>

Offers best practices for community development. Help for all local governments to build more resilient, environmentally conscious, economically secure, and socially equitable communities.

Planning Toolbox: Green Development Codes/Ordinances

<https://www.chescoplanning.org/MuniCorner/Tools/GreenCodes.cfm>

Green land development ordinances provide the following advantages:

- **Energy Conservation:** The use of green development practices and techniques can reduce the long-term use of energy.
- **Financial Benefits:** Houses (as well as non-residential structures) built in developments using green design principles can require less energy to heat and cool, thus allowing financial resources to be directed towards other appropriate areas.
- **Encourages Market Acceptance:** Developments using green technology can stimulate more such developments and can help increase their market acceptance.
- **Lowers Pollution:** Sustainable land developments can reduce air pollution and improve indoor air quality.
- **Environmental Protection:** Green developments can help protect sensitive environmental areas through their preservation and by removing pollutants.
- **Safety:** Green developments stress the safety of their residents, including roadway and environmental safety.

Green Infrastructure Toolkit

<https://www.georgetownclimate.org/adaptation/toolkits/green-infrastructure-toolkit/incentive-based-tools.html>

Financial and Development Incentive-Based Tools

While mandates are the most certain method to change behavior, both financial and development incentives for green infrastructure can be important tools as well. Both types of incentives can stand alone or can accompany mandates; unlike mandates, incentives can influence stormwater management practices on property that is not otherwise subject to zoning or building code requirements (i.e., existing development not planned for renovation). They therefore can be a critical tool for highly-developed municipalities to spur change on private property.

Sustainable: Green zones offer energy-efficiency incentives

<https://finance-commerce.com/2019/04/sustainable-green-zones-offer-energy-efficiency-incentives/>
(One example of green zone incentives effectively and successfully put into practice.)

The idea would be for non-polluting businesses to incorporate land protection practices above the aquifer for even small green-spaces, such as other areas are doing:

Denmark plans to plant one million trees (to combat air pollution and cover groundwater sites to protect their drinking water).

<https://www.sustainability-times.com/environmental-protection/denmarks-tree-telethon-raises-funds-for-forests/>

... forests are one of the most effective means of [absorbing CO₂](#), and much needed to achieve global climate emissions targets and protect biodiversity. In popular terms, the forests are the lungs of the earth,” said the Growing Trees Network Foundation, citing data from the United Nations climate reports. “At the same time, they protect our groundwater reservoirs, create new habitats for plants and wildlife, and new areas of recreation for citizens.”

King County moves closer to planting one million trees

<http://www.mi-reporter.com/news/king-county-moves-closer-to-planting-one-million-trees/>

Naturalization of land, even small plots, is less expensive than run-off infrastructure, and easily economical in the short and long-term since naturalized plot require little-to-no-maintenance but attracts birds, butterflies and other essential pollinators. Eventually, with the advent of climate change, all fresh water will likely need to infiltrate into aquifers for the future of our drinking water supply, never directed into wastewater or the salt-water bay.

Other groundwater protection approaches have been to donate land:

Nature Conservancy

<https://www.nature.org/en-us/about-us/where-we-work/united-states/texas/stories-in-texas/edwards-aquifer-protection/>

This kind of natural land covering is economical in the long run, since it is self-maintaining (no mowing) made of native plants and trees, as well as benefitting nearby residents and the drinking water quality. Such improvements may also open additional federal incentive options.

Conclusion:

It is time to give South Tacoma the consideration it has always deserved but has not yet been receiving, especially since the city is pushing for dense in-fill housing in South Tacoma close to the border of the industrial area, and because our climate is reaching a state-of-no-return if we don't begin making better choices now. This is our time to correct these oversights, and our very realistic chance to begin turning South Tacoma into a contemporary green business district of the future, unique to anywhere in Washington State.

Submitted by:

South Tacoma Neighborhood Council - Board

Heidi Stephens, Resident of South Tacoma, At-Large Board Member