



## CITIZENS FOR A HEALTHY BAY

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January 21, 2009

Ms. Molly Harris, Urban Planner  
Planning Division,  
Tacoma Community and Economic Development  
747 Market Street, Ste. 1036  
Tacoma WA 98402

Re: City of Tacoma SMP draft Restoration Plan

Dear Ms. Harris:

This letter presents comments by Citizens for a Healthy Bay to the above referenced restoration plan. Additional comments are attached to this letter.

In general, CHB recognizes the extensive efforts City staff has made toward an update of the City's Shoreline Master Plan (SMP). We look forward to continuing to work with the City and local stakeholders to achieve an SMP update that can become a model for Puget Sound cities.

Overall the draft plan offers general actions that, if completed, could help to restore some functions and values to Tacoma's aquatic ecosystems and shoreline environments however the measures listed are non-specific as to sites or reaches where projects can be accomplished as well as opportunities to facilitate restoration goals in Tacoma. CHB anticipated that the draft restoration plan would provide more specificity and build on the tremendous restoration efforts already implemented by the City of Tacoma and other local stakeholders.

CHB appreciates the important role water quality improvement efforts and public education hold in efforts to achieve a healthy, vibrant Puget Sound; we are concerned however by the emphasis placed on these activities in the draft restoration plan. These are required actions under the City's NPDES permit as well as the Superfund Consent Decree with EPA and although they may contribute to the improved quality of Tacoma's aquatic environment, they are not restoration actions in and of themselves. CHB also recognizes that some issues can only be addressed at the watershed scale along with other stakeholders; however Tacoma's restoration plan must focus on actions within the city limits.

CHB is a community based, non-profit environmental organization representing the community stakeholders in Tacoma and South Central Puget Sound.

Thank you for your consideration of our remarks.

Sincerely,

*Leslie Ann Rose*

Leslie Ann Rose  
Senior Policy Analyst  
Citizens for a Healthy Bay

## 2.0 Introduction

- For the purposes of consistency, the final Restoration Plan adopted by the City of Tacoma must incorporate the Commencement Bay Natural Resource Restoration Plan (the Plan) (1997). The Plan has been the basis for siting and designing all mitigation and restoration actions undertaken in Commencement Bay and the Puyallup River Estuary since 1997. (page 1, 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs) CHB highly recommends that City of Tacoma staff meet with the Commencement Bay NRDA Trustees to discuss how the NRDA process and the SMP restoration plan can work together.

## 3.2 Defining Restoration

- *“...restoration can be broadly implemented through a combination of programmatic measures (such as surface water management or public education) and site specific projects (such as riparian plantings or habitat creation).”* (page 5, 3<sup>rd</sup> paragraph) The restoration plan adopted by the City of Tacoma should include quantifiable and measureable results. Surface water management and public education, while an important component of the City’s NPDES permit, the outcomes of these activities cannot readily be translated in terms of re-established functions and values of nearshore habitat. We encourage the City to focus its restoration efforts under the SMP to efforts strongly rooted in best available science with quantifiable and measureable outcomes.

## 4.2 Open Space and Habitat Plan

- Verify that the final plan adopted by the Tacoma City Council is consistent with the restoration plan under SMP, which was drafted before the plan was adopted. (page 6)

### 4.3.1 Hydrology

- A number of goals and objectives are detailed for reaches potentially outside the Tacoma city limits (such as reconnecting the Puyallup River and Hylebos Creek channels to the floodplain and increasing flood storage along the Puyallup River. The draft restoration plan identifies high costs due to land acquisition expenses and the amount of work required to reverse habitat modification as a limiting factor to restoration (page 6). As such, Tacoma’s restoration resources must be confined to projects with the Tacoma’s jurisdictional boundaries. (pages 7 and 8)

### 4.3.2 Sediment Generation and Transport

- *“...reduce sediment loading in the Puyallup River, Hylebos Creek...”* (page 8) See remarks to 4.3.1 – Hydrology, above. How much of the 300,000 yds<sup>3</sup> per year of sediment delivered to Commencement Bay stems from the glacial origins of the Puyallup River system?
- *“...implement stormwater quality measures in the Hylebos Creek Basin Plan.”* (page 8) See remarks to 4.3.1-Hydrology, above. Approximately 0.5 miles of Hylebos Creek lies within Tacoma’s jurisdictional boundaries. As CHB understands the Hylebos Creek basin plan is the governing document for the City of Federal Way and Pierce County.

### 4.3.4 Habitat

- *“...reintroduce LWD along the Puyallup River through plantings and wood placement as consistent with levee management standards.”* (page 9) To the best of CHB’s knowledge, the Army Corps of

Engineers, who oversees levee management, does not allow either plantings or wood placement on or near the levees.

- “...re-establish native riparian plan and forest community along Hylebos Creek.” (page 9) See remarks to 4.3.1-Hydrology, above.

#### 5.1 Opportunities

- “Restoration opportunities were identified based on the findings of the Shoreline Inventory and Characterization (2007).” (page 10) Opportunities need to be identified in concert with the Bay Natural Resource Restoration Plan (the Plan) (1997) and the Commencement Bay Aquatic Ecosystem Assessment (2000). These documents have been the basis of all mitigation and restoration projects to date implemented by all local, state and federal stakeholders in Commencement Bay. Both documents are founded on sound scientific principle and identify the functions and values that require restoration.

#### Table 2 – Ecological Process, Restoration Goals and Objectives, and Associated Actions

- S-1 and S-4 need to be added to the table.
- Proposed restoration activities need more specificity (i.e., specify sites or reaches and identify projects and possible partners). The table does not detail barriers to restoration. For example, removal of barriers to sediment delivery from bluffs and replacement of existing bulkheads are stated as restoration actions for S-2 and S-3. The table does not detail that shoreline armoring is associated with the BNSF right of way and that sediment delivery from bluffs is blocked by the rail system, therefore, without BNSF cooperation, these restoration activities in these shoreline reaches are not possible.
- The table excludes details for site specific restoration opportunities, i.e., of the Titlow Pond, restoration of kelp beds at Point Defiance and Brown’s Point, shoreline softening pilot project sites along Ruston Way, etc.
- Water quality improvement measures and BMPs are required measures under the City’s NPDES permit and should not necessarily be considered as active restoration efforts.
- Measure of success for establishment of native plant species along Hylebos Creek is stated as “...number of trees and plants surviving 2 years after planting.” Plant community establishment in Tacoma/Commencement Bay requires 5 – 10 years of monitoring and active adaptive management.
- Pollutant loading through wastewater treatment facilities is not addressed as part of the restoration activities although these operations have been identified as posing a risk to Puget Sound from discharges of pharmaceuticals and personal care products not captured in the treatment process.
- “Do not allow wetland fill in or adjacent to shoreline districts.” This issue is captured in the Critical Areas Ordinances for the City of Tacoma along with the mandate to “prevent, avoid or mitigate”. As such, this should not be considered a restoration action.

#### 5.2 Criteria for Prioritizing Restoration Projects

- “High level guidance on appropriate shoreline enhancement actions from the Commencement Bay Aquatic Ecosystem Assessment (2000) **can help guide** restoration decisions.” The assessment, completed by Dr. Charles Simenstad of the University of Washington, was, in part, commissioned by and paid for by the City of Tacoma. As such CHB urges that all restoration actions within Commencement Bay **will be guided** by this assessment as it details the framework for the lost critical functions and values within the Commencement Bay estuary.

#### 7.3 Strategies for Measuring and Ensuring Effectiveness

- ***“Environmental Education and Volunteer Coordination - ...create a shoreline restoration initiative... Volunteers could be provided with shoreline stewardship training...”*** CHB’s Adopt-a-Wildlife-Area (AWA) citizen stewardship plan has successfully recruited and training community volunteers to maintain and monitoring numerous existing habitat restoration sites in and around the Tacoma area since 2000. Through the AWA hundreds of community members provide thousands of hours per year to ensuring that the local investment in habitat restoration is protected and enhanced including those made by the City of Tacoma. CHB is willing to partner with the City of Tacoma in such an undertaking, bringing our expertise, resources and wealth of experience to the table to ensure a quality program.

#### 1.2.2.3 Scrap & Ores

- *“...that these firms will remain in their present location...”* Highly likely that, should these operations be required to relocate, it is highly unlikely that they would remain in the Commencement Bay area due to lack of suitable shoreline property.

#### 1.2.2.4 Forest Products

- The reliance for delivery of logs by water has diminished significantly in the last 10 years and is likely to continue to do so in part because loss of timber associated with in-water delivery is estimated by some to be as high as 10%. In-water log storage space has decreased approximately 90% and further reductions are anticipated in the next several years which could further limit the reliance for water access for delivery of forest products.

#### 1.2.3.1 Commercial Vessel Moorage

- *“Additional moorage of this type could be provided in the Hylebos Waterway...”* The size of vessels able to access the upper Hylebos Waterway is limited by the *pinch-point* at the head of the waterway created by the Hylebos Bridge and surrounding uplands.

#### 1.3.1 S-1 Western Slope South

- The property owner plans a mixed use redevelopment of the property possible including residential. The property owner is not required to enhance/expand recreational boating facilities at this site.

#### 1.3.4 S-4 Point Defiance Natural

- *“There are no waterfront facilities in this area.”* Due to currents, tidal energy and lack of accessible uplands in this shoreline reach, waterfront facilities are not feasible.

#### 1.3.5 S-5 Point Defiance Conservation

- *“Metro Parks is completing a plan for redevelopment that would enhance boating facilities in this area.”* Point Defiance is an important pedestrian corridor for shoreline access and a significant component of the shoreline trail starting at Point Defiance and terminating at the head of Thea Foss Waterway. It is important that any redevelopment by Metro Parks not adversely impact pedestrian shoreline access and enjoyment.

#### 1.3.7 S-6 Ruston Way

- *“The current SMP encourages the development of more public waterfront access in this district.”* Public waterfront access is not and should not be limited to commercial endeavors such as restaurants and marinas but includes pedestrian access as well access for diving, non-motorized vessels and other recreational activities.

#### Table 1 – City of Tacoma Acreage within Shoreline Districts

It appears that existing habitat restoration and mitigation sites have been lumped into the “vacant” matrix category. This designation is not appropriate or technically correct. The waterfront lands analysis must recognize restoration and mitigation as a specific shoreline use and be designated separately in Table 1.

#### 2.1.1 S-1 Shoreline District – Western Slope

- Pedestrian public shoreline access located at the southern most corner of Titlow Park and is limited by BNSF.
- Titlow Beach is a marine habitat of special significance.

#### 2.1.4 S-5 Shoreline District – Point Defiance - Conservation

- *“The Tacoma Yacht Club is located adjacent to the Breakwater Marina.”* The Tacoma Yacht Club is a private facility limited to the use of its members.
- *“...development of a Peninsula Park on the peninsula ground adjacent to the Breakwater Marine...”* It is important to note that this site is part of the Asarco Superfund Problem Area and is subject to remedial action before the park can be completed *“There are numerous commercial businesses in this area...”* It is important to note as well that this is one of Tacoma’s single largest quasi open space/public shoreline access corridors. Future development must preserve this valuable shoreline use.

#### 2.1.8 S-8 Shoreline District – Puyallup River

- *“According to parcel information for this district, nearly half of the 109 acres are in uses...”* There are 3 habitat mitigation sites located on this reach of the Puyallup River, 2 constructed by the Port of Tacoma and 1 constructed by the City of Tacoma which accounts for up to as much 10% of the 109 acres in this district.

#### 2.1.9 S-10 Shoreline District – Port Industrial

- The Superfund remedial action in the Hylebos Waterway incorporated several areas where contamination was capped in place. These capped areas may place limitations on future use and development of the Hylebos Waterway and/or will require removal and disposal of contaminated sediments to accommodate development/expansion.
- Figure 54 illustrates the fact that the major portion of Middle Waterway has been reconstructed as restoration/mitigation. This important restoration site is one of many sites that have been completed to achieve a continuous habitat corridor that extends across Commencement Bay from the mouth of the Foss Waterway to the mouth of the former Milwaukee Waterway and incorporates the expanding neo-delta at the mouth of the Puyallup River.
- Figure 55 illustrates Simpson Kraft and Lumber Mills at the St. Paul Waterway. The St. Paul is the site of the confined sediment disposal facility constructed by the City of Tacoma in conjunction with the Foss Waterway Superfund remedial action as well as incorporating important restoration components at the mouth of the Puyallup River.
- (page 52, bottom paragraph) *“The area between the Puyallup River and the Sitcum Waterway...”* A significant habitat mitigation site is located at the mouth of the former Milwaukee Waterway located between the Puyallup River and Sitcum Waterway.
- (page 65, bottom paragraph) *“Berth space on the Hylebos Waterway will also be available for moorage of vessels.”* The size of vessels able to access the upper Hylebos Waterway is limited by the *pinch-point* at the head of the waterway created by the Hylebos Bridge and surrounding uplands.
- (page 66, second paragraph) *“Adjacent to the Earley Business Center on the Hylebos Waterway is a vacant property which once housed a chemical plant...”* This is a RCRA/Superfund site under the oversight of EPA and Dept. of Ecology. Remedial investigation is presently underway. Cleanup is not anticipated to begin before 2013.

S-11 Shoreline District – Marine View Drive So.

- For the purposes of consistency and ease of administration, the boundary to this shoreline district should be moved north to include all of the Ole and Charlie's Marina site owned by the Puyallup Tribe.

S-12 Shoreline District – Marine View Drive No.

- This shoreline reach is an important restoration corridor in Commencement Bay including sites that have been completed and a 30-60 acre site under design by the Port of Tacoma. The uplands are characterized by steep, unstable slopes unsuitable for development.
- The history and composition of the residential community in the S-12 Shoreline District is very like that of the Salmon Beach Community. Therefore the Marine View Drive community should be regarded and regulated like the Salmon Beach Community.