

**From:** Esther Day <Dayesther214@outlook.com>  
**Sent:** Friday, January 27, 2023 5:55 PM  
**To:** Woodards, Victoria; Ushka, Catherine; Walker, Kristina; Blocker, Keith; Hines, John; Diaz, Olgy; Daniels, Kiara  
**Cc:** City Clerk's Office; Pauli, Elizabeth  
**Subject:** Video Of Alexandria Ocasio-Cortez Told To 'Educate Yourself' Goes Viral

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mayor and City Council,

I am sending you a video from the internet. I am sending this to you because Ocasio-Cortez makes a very good point about people studying science to learn that we need to work on our climate change issues.

If we do not do something about protecting our precious rechargeable water aquifers and other precious resources, we will have serious issues of survival.

Please listen. We cannot waste precious time. Just ask the people in Arizona what is happening to them with the lack of water.

Think fires also. Listen to this.

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I thought you would be interested in this story I found on MSN: Video Of Alexandria Ocasio-Cortez Told To 'Educate Yourself' Goes Viral - <https://www.msn.com/en-us/weather/topstories/video-of-alexandria-ocasio-cortez-told-to-educate-yourself-goes-viral/vi-AA16NHAY?ocid=msedgdhp&pc=W000&cvid=e1c7f10dd43b49d2b0f0f1635713298b>

**From:** Marshall McClintock <marshalm@q.com>  
**Sent:** Monday, January 30, 2023 10:41 AM  
**To:** City Clerk's Office  
**Subject:** moratorium on South Tacoma Groundwater Protection District.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mayor Woodards and City Council members:

Please support the proposed moratorium on Underground Storage Tanks and Metal Recycling/Auto Wrecking facilities within the South Tacoma Groundwater Protection District. However, the moratorium should be expanded to include large, non-permeable parking lots and buildings until we fully understand how the South Tacoma aquifer is recharged. With declining snow pack, Tacoma with its increased density due to Home in Tacoma will increasingly rely on this aquifer.

Marshall McClintock

**From:** Dale Bickenbach <BickDaleN@outlook.com>  
**Sent:** Monday, February 6, 2023 10:27 AM  
**To:** City Clerk's Office  
**Subject:** Moratorium South Tacoma Aquifer, Support of

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

With questionable practices of Tacoma Water and a very poor video produced I support the weak subject Moratorium. Better understanding of the actual, close as possible, infiltration/recharge of the aquifer, and effects of develop around and over need further study.

Thanks.

dnb

Dale N Bickenbach  
5232 South Mason Avenue  
Tacoma, Washington  
98409-1817  
1 253 475 5242

**From:** DeeBee Cooper <mr\_tjsmith@hotmail.com>  
**Sent:** Monday, February 6, 2023 1:05 PM  
**To:** City Clerk's Office; Sorum, Doris (Legal)  
**Cc:** EPAULI@cityoftacoma; Pauli, Elizabeth  
**Subject:** Comments for 07 FEB Public Hearing on a Moratorium for the STGWPD  
**Attachments:** Comments for 07 FEB Moratorium.docx

**Importance:** High

**Follow Up Flag:** Follow up

**Flag Status:** Flagged

Please submit my comments for the record during this public hearing.

Thank-you,

Tim Smith

Please pass this limited moratorium; however, please make it stronger. The original reason the public had called for the moratorium was to put impervious surface limits to protect infiltration recharge. This very limited moratorium review cannot be considered scoping for the groundwater code update (as this process has not come close to including all necessary information nor the required agencies and stakeholders).

In 1988 the City of Tacoma found that it was necessary and in the public interest to establish the South Tacoma Groundwater Protection District. The code, itself, contains language requiring periodic review, yet a full review of the governing zoning overlay is long overdue and must incorporate up-to-date best science. The entire South Tacoma Groundwater Protection District has been designated an environmentally critical area, which the city has acknowledged but isn't properly following critical preservation code. The groundwater code calls for protection of aquifer volume; however, the city is not addressing this with any current best science.

Information from independent experts have been presented, indicating many items the city has not been adequately addressing regarding aquifer hydrology. The inadequate city/county panel has not included required agencies and are mostly focusing on what is currently prohibited but ignoring the many areas still lacking which was the point of this moratorium request.

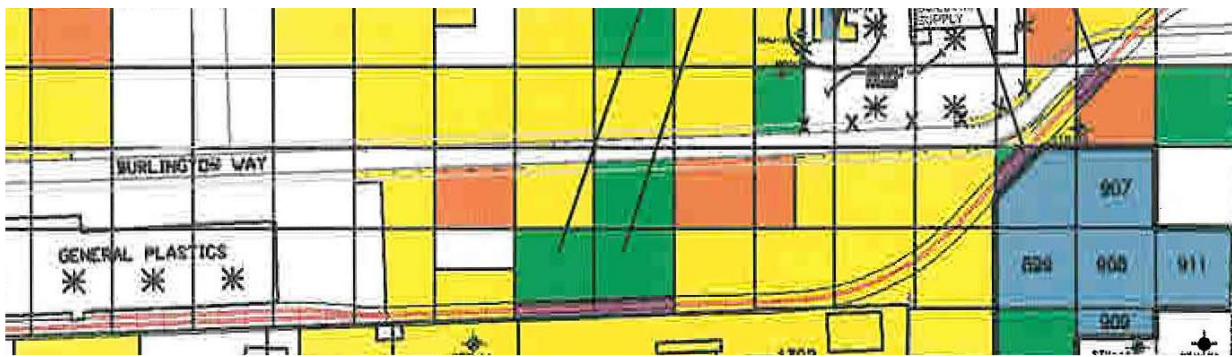
Instead of the City Council's initial ordinance including infiltration/recharge, we were told the Planning Commission could add that; however, the Planning Staff and Planning Commission Chair refused additional considerations from the public while adding unsubstantiated items their own (which were later removed by IPS due to lack of evidence).

The area represented by this proposed amendment covers one-fifth of the city area and is designated as an Critical Aquifer Recharge Area. The intent of this STGWPD (the current law and the proposed workplan to update) is intended to establish orderly procedures which reduce the risks to public health and safety and maintain the existing groundwater supply within the South Tacoma Groundwater Protection District as near as reasonably possible to its natural condition of purity.

Despite what the city claims, contamination of the groundwater protection district continues to occur. A moratorium is needed to pause repeatedly damaging development until accurate study has been completed and appropriately applied. If a business is in violation and causing disruption to either groundwater quality or quantity, then that's evidence they likely shouldn't have been allowed to operate there in the first place -not-further allowed to expand as if that's a possible means of correction! These exceptions and other "mitigations" further contaminated the very Aquifer they are paid to protect.

The failure to do these needed updates and reinforce the primacy of this zoning overlay district has created a situation allowing for the siting of new and proposed developments where the intent and purpose of the STGWPD has been placed far down the list when determining suitability and impact of major development. The "Findings of Fact" were compiled by the same limited city/county departments which brought us to this bad state. Remove the language regarding allowing exceptions at the Planning Department's discretion.

For example, The Tacoma Pierce County Health Dept (governing management and punitive authority) and the City of Tacoma (land use and zoning) made every exception possible to place a metal and auto salvage yard DIRECTLY over one of the most remediated properties in the 260-acre superfund site known as Operable Unit 4. A portion of this property had been restored to "Above Residential Levels" of acceptable contamination as shown in this map extract from the 2019 report to the EPA on remediation efforts by the responsible party (BNSF). See extract below "Site Development and Institutional Controls Plan South Tacoma Field Tacoma, Washington" 1 May 2019 from BNSF to the EPA Region 10 page 27.



#### LEGEND

Orange: REMEDIATED GRID BELOW RESIDENTIAL CLEANUP LEVEL (CAPPING CHEMICALS ONLY)

Yellow: GRID COVERED WITH AT LEAST 6» CLEAN SOIL AND HYDROSEEDDED

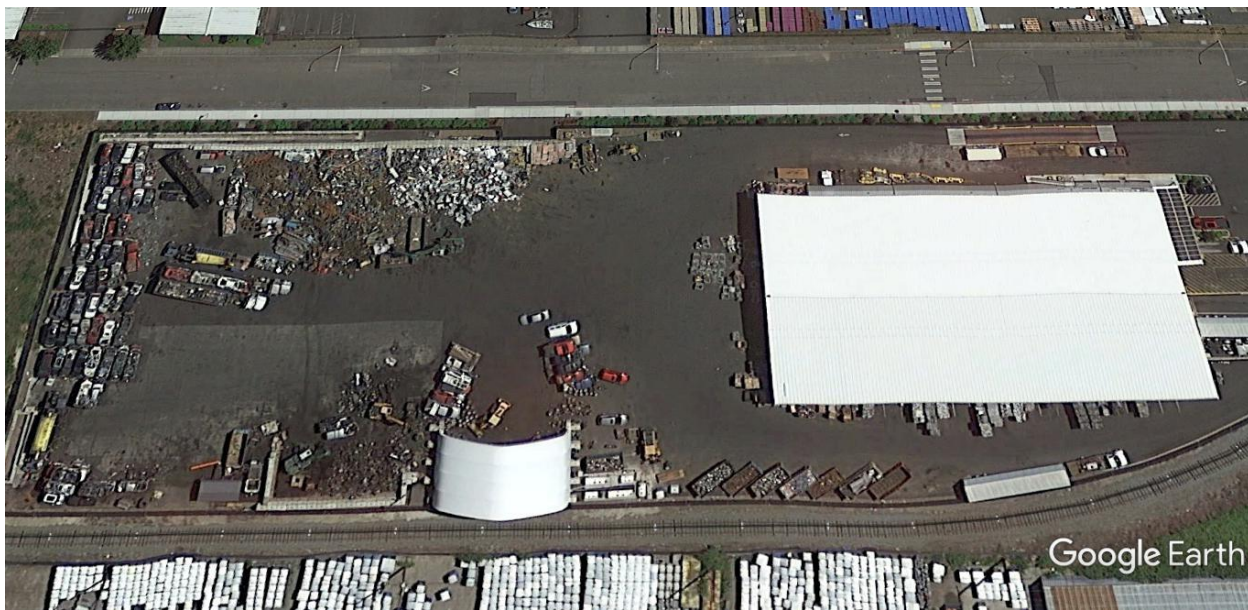
Green: GRID ABOVE RESIDENTIAL CLEANUP LEVEL

Yet, here is the remediated area in a June 2021 satellite image, now occupied by one of the most contaminating producing industries: Sutter's Metal Recycling. The toxic site is the large white building just right of center and surrounding salvage yard: S 56<sup>th</sup> street on the right edge, Burlington Way left to right in the middle, Tacoma Rail curving just above the bottom:



Although in 2019 this area was remediated to a level acceptable for RESIDENTIAL reuse, indications from groundwater monitoring since that time show a mysterious "spike" in iron oxides. The system reportedly does not function to standard!





A closer look from a satellite clearly shows the presence of vehicle fluid on the paved surfaces as well as LARGE AREAS OF ORANGE coloration indicative of (you guessed it) RUST – IRON OXIDE! What would more robust and frequent on-site testing reveal? After finally listening to a resident USING SATELLITE PHOTOS to identify a probable violation of the permit! The State of WA Dept of Ecology went out and found the issues – not the responsible agency TPCHD. **See the initial report below.** Talk about giving the mouse a cookie some want to allow this toxic business to expand because it is going to be good for the environment. Really?? We need to update the STGWPD to make that answer possible.

The current code prohibits and discourages such facilities based on the guidance promulgated by the EPA concerning such highly toxin prone facilities, and yet these continue to be allowed through “exceptions”, so violations and contamination continue to occur:

#### **Potential Pollutants at an Auto Salvage Yard:**

- Used oil
- Used transmission fluid
- Used brake fluid
- Used wiper fluid
- Used antifreeze
- Gasoline
- Batteries
- Oily water
- On-road diesel
- Off-road diesel
- Metals
- Solvents / detergents
- Hydraulic fluid
- Lubricating fluids
- Mercury
- Refrigerants

The EPA strongly recommends such facilities prevent exposure of the automobile hulks to exposure to rain, implores the draining of fluids prior to placing them into the salvage stream, and to NOT allow them in hydrologically sensitive area. But there it is, and now this company wants to expand. Notice the vast piles of metal and hulks exposed to the elements and rainfall. More rigorous oversight, monitoring, and existing punitive measure for compliance MUST be done – now – and reinforced before any new hazardous or impactful development occurs. We should have updated the STGPD years ago.

WHY IS THE STPWD review and STEGZ update so vital? To prevent additional developments such as this over a critical groundwater and aquifer water supply using all and best available science. Pursuant to Ecology's Chapter 197-11-908 WAC and TMC Section 13.12.908 it is the policy of the City of Tacoma and City code to establish strict performance standards which will reduce or eliminate threats to this resource.

All properties and developments within the Protection District, as defined in Section 13.01.090, shall comply with these requirements, and any additional requirements of the sub-zoning districts where the property is located or may be located in the future. In the event of conflict with other regulations, the provisions of the existing STGPD code shall control... and yet, this groundwater code appears to be repeatedly forgotten, overlooked and worked around, to the detriment of our water supply and public health.

Now is time to leverage the fusion and synchronization of involved parties including on-going efforts to improve the South Tacoma Well Field as well as a current study of potential improvements to the Middle Flett Creek Watershed, development of a local air quality monitoring network and the needed rounding together of external County, State and Federal agencies all requires a "pause" to incorporate knowledge gains while also working toward create a cleaner world by 2050.

This community amendment application was for both a code update in 2022 as well as a proposal for an entirely new look at the potential for green economic activities which support the primary zoning protections of the existing code. The proposal aligns with at least 25 major goals of the City Climate Action Plan. Taking a "pause" with the types of development and understanding their actual impact (via projected out-source studies) magnifies the critical importance of this most vital protective code and maximizes and sets the conditions for continued green economic development and growth.

A pause in development would also provide time for developing a financial benefit and direct financial offset for any approved development to help mitigate the immediate loss due to increased pollution and their direct impact on healthcare, livelihood, and general happiness and well-being. Business and developers in a new green economic zone would have a myriad of tax breaks and financial incentives. The residents of this overburdened community deserve an incentive as well: direct energy consumption offsets from and major developments or monthly vouchers for associated health or building costs. If a developer can receive a tax break/offset, then those impacted by that development should get something for the impact as well.

Please, support this moratorium, to integrate and accelerate the proposals for the Economic Green Zone, suspend development applications and place a moratorium on permitting until the superseding Groundwater Protection District code is updated.

Water IS life...

Vr,

Timothy Smith



# INITIAL INVESTIGATION FIELD REPORT



☐ Check this box if you have attached any documents to this form (using the paperclip icon on the left).

ERTS #(s):  
Parcel #(s):  
County:  
FSID #:  
CSID #: UST  
#:

706136
2783010183
Pierce
30623
15544

## SITE INFORMATION

Site Name (Name over door): Sutter Metals Tacoma	Site Address (including City, State and Zip): 5302 S Burlington Way Tacoma, WA 98409	Phone Email
Site Contact, Title, Business: Sutter Family Holdings LLC	Site Contact Address (including City, State and Zip): 109 Carpenter Rd NE Lacey, WA 98516	Phone Email
Site Owner, Title, Business: Sutter Family Holdings LLC	Site Owner Address (including City, State and Zip): 109 Carpenter Rd NE Lacey, WA 98516	Phone Email
Site Owner Contact, Title, Business:	Site Owner Contact Address (including City, State and Zip):	Phone Email
Previous Site Owner(s):	Additional Info (for any Site Information Item):	
Alternate Site Name(s):		

Latitude (Decimal Degrees): 47.20943
Longitude (Decimal Degrees): -122.48860

Please check this box if there is relevant inspection information, such as data or photos, in an existing site report for this site.

## INSPECTION INFORMATION

Clear Inspection Specific Info

Inspection Conducted: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date/Time:	Entry Notice: Announced <input type="checkbox"/> Unannounced <input type="checkbox"/>
Photographs taken? Yes <input type="checkbox"/> No <input type="checkbox"/>	Note: Attach photographs or upload to PIMS	
Samples collected? Yes <input type="checkbox"/> No <input type="checkbox"/>	Note: Attach record with media, location, depth, etc.	

## RECOMMENDATION

No Further Action (Check appropriate box below):	LIST on Confirmed and Suspected Contaminated Sites List: <input checked="" type="checkbox"/>
Release or threatened release does not pose a threat <input type="checkbox"/>	
No release or threatened release <input type="checkbox"/>	
Refer to program/agency (Name: _____) <input type="checkbox"/>	
Independent Cleanup Action Completed (contamination removed) <input type="checkbox"/>	

COMPLAINT (Brief Summary of ERTS Complaint):

Oils leaking from recycling process onto and off property

CURRENT SITE STATUS (Brief Summary of why Site is recommended for Listing or NFA):

Site recommended for listing as a result of provided photos documenting soil contamination on the Sutter Metals Site and on its western adjacent parcel but appearing to have originated from the Sutter Metals Site

Investigator: Kirsten Wecker

Date Submitted: 5/4/2021

**OBSERVATIONS**

Please check this box if you included information on the Supplemental Page at end of report.

☐

**Description** (If site visit made, please be sure to include the following: site observations, site features and cover, chronology of events, sources/past practices likely responsible for contamination, presence of water supply wells and other potential exposure pathways, etc.):

4/15/21: Photos of the Site were provided with the initial ERTS report indicating

- A “large pool of standing oil and transmission fluid seeping outside of their containment bunker and running outside of their fence onto adjacent land”
- “standing oil that has come from the property”

4/15/21: The City of Tacoma provided photos of the adjacent impacted parcel collected 4/15/21. The photo indicated dark soil staining along the Sutter Metals property appearing to lead on to the adjacent property.

Given the provided photos documenting soil contamination on the Sutter Metals Site and on its western adjacent parcel but appearing to have originated from the Sutter Metals Site, I recommend including the Sutter Metals Tacoma Site on the Confirmed and Suspected Contaminated Sites List as a Site awaiting Cleanup.

Documents reviewed:

CONTAMINANT GROUP	CONTAMINANT	SOIL	GROUNDWATER	SURFACE WATER	AIR	SEDIMENT	DESCRIPTION
Non- Halogenated Organics	Phenolic Compounds						Compounds containing phenols (Examples: phenol; 4-methylphenol; 2-methylphenol)
	Non-Halogenated Solvents						Organic solvents, typically volatile or semi-volatile, not containing any halogens. To determine if a product has halogens, search HSDB ( <a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB">http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB</a> ) and look at the Chemical/Physical Properties, and Molecular Formula. If there is not a Cl, I, Br, F in the formula, it's not halogenated. (Examples: acetone, benzene, toluene, xylenes, methyl ethyl ketone, ethyl acetate, methanol, ethanol, isopropanol, formic acid, acetic acid, stoddard solvent, Naptha). <i>Use this when TEX contaminants are present independently of gasoline.</i>
	Polynuclear Aromatic Hydrocarbons (PAH)	S	S				Hydrocarbons composed of two or more benzene rings.
	Tributyltin						The main active ingredients in biocides used to control a broad spectrum of organisms. Found in antifouling marine paint, antifungal action in textiles and industrial water systems. (Examples: Tributyltin; monobutyltin; dibutyltin)
	Methyl tertiary-butyl ether						MTBE is a volatile oxygen-containing organic compound that was formerly used as a gasoline additive to promote complete combustion and help reduce air pollution.
	Benzene	S	S				Benzene
	Other Non-Halogenated Organics	S	S				TEX
	Petroleum Diesel	S	S				Petroleum Diesel
	Petroleum Gasoline	S	S				Petroleum Gasoline
	Petroleum Other	S	S				Oil-range organics
Halogenated Organics (see notes at bottom)	PBDE						Polybrominated di-phenyl ether
	Other Halogenated Organics						Other organic compounds with halogens (chlorine, fluorine, bromine, iodine). search HSDB ( <a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB">http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB</a> ) and look at the Chemical/Physical Properties, and Molecular Formula. If there is a Cl, I, Br, F in the formula, it is halogenated. (Examples: Hexachlorobutadiene; hexachlorobenzene; pentachlorophenol)
	Halogenated solvents						PCE, chloroform, EDB, EDC, MTBE
	Polychlorinated Biphenyls (PCB)						Any of a family of industrial compounds produced by chlorination of biphenyl, noted primarily as an environmental pollutant that accumulates in animal tissue with resultant pathogenic and teratogenic effects
	Dioxin/dibenzofuran compounds (see notes at bottom)						A family of more than 70 compounds of chlorinated dioxins or furans. (Examples: Dioxin; Furan; Dioxin TEQ; PCDD; PCDF; TCDD; TCDF; OCDD; OCDF). <i>Do not use for 'dibenzofuran', which is a non-chlorinated compound that is detected using the semivolatiles analysis 8270</i>
Metals	Metals - Other	S	S				Cr, Se, Ag, Ba, Cd
	Lead	S	S				Lead
	Mercury						Mercury
	Arsenic						Arsenic
Pesticides	Non-halogenated pesticides						Pesticides without halogens (Examples: parathion, malathion, diazinon, phosmet, carbaryl (sevin), fenoxycarb, aldicarb)
	Halogenated pesticides						Pesticides with halogens (Examples: DDT; DDE; Chlordane; Heptachlor; alpha-beta and delta BHC; Aldrin; Endosulfan, dieldrin, endrin)

CONTAMINANT GROUP	CONTAMINANT	SOIL	GROUNDWATER	SURFACE WATER	AIR	SEDIMENT	DESCRIPTION
Other Contaminants	Radioactive Wastes						Wastes that emit more than background levels of radiation.
	Conventional Contaminants, Organic						Unspecified organic matter that imposes an oxygen demand during its decomposition (Example: Total Organic Carbon)
	Conventional Contaminants, Inorganic						Non-metallic inorganic substances or indicator parameters that may indicate the existence of contamination if present at unusual levels (Examples: Sulfides, ammonia)
	Asbestos						All forms of Asbestos. Asbestos fibers have been used in products such as building materials, friction products and heat-resistant materials.
	Other Deleterious Substances						Other contaminants or substances that cause subtle or unexpected harm to sediments (Examples: Wood debris; garbage (e.g., dumped in sediments))
	Benthic Failures						Failures of the benthic analysis standards from the Sediment Management Standards.
	Bioassay Failures						For sediments, a failure to meet bioassay criteria from the Sediment Management Standards. For soils, a failure to meet TEE bioassay criteria for plant, animal or soil biota toxicity.
Reactive Wastes	Unexploded Ordnance						Weapons that failed to detonate or discarded shells containing volatile material.
	Other Reactive Wastes						Other Reactive Wastes (Examples: phosphorous, lithium metal, sodium metal)
	Corrosive Wastes						Corrosive wastes are acidic or alkaline (basic) wastes that can readily corrode or dissolve materials they come into contact with. Wastes that are highly corrosive as defined by the Dangerous Waste Regulation (WAC 173-303-090(6)). (Examples: Hydrochloric acid; sulfuric acid; caustic soda)

(fill in contaminant matrix above with appropriate status choice from the key below the table)

Status choices for contaminants	
Contaminant Status	Definition
B— Below Cleanup Levels (Confirmed)	The contaminant was tested and found to be below cleanup levels. (Generally, we would not enter each and every contaminant that was tested; for example if an SVOC analysis was done we would not enter each SVOC with a status of "below". We would use this for contaminants that were believed likely to be present but were found to be below standards when tested)
S— Suspected	The contaminant is suspected to be present; based on some knowledge about the history of the site, knowledge of regional contaminants, or based on other contaminants known to be present
C— Confirmed Above Cleanup Levels	The contaminant is confirmed to be present above any cleanup level. For example—above MTCA method A, B, or C; above Sediment Quality Standards; or above a presumed site-specific cleanup level (such as human health criteria for a sediment contaminant).
RA— Remediated - Above	The contaminant was remediated, but remains on site above the cleanup standards (for example—capped area).
RB— Remediated - Below	The contaminant was remediated, and no area of the site contains this contaminant above cleanup standards (for example—complete removal of contaminated soils).

**Halogenated chemicals and solvents:** Any chemical compound with chloro, bromo, iodo or fluoro is halogenated; those with eight or fewer carbons are generally solvents (e.g. halogenated methane, ethane, propane, butane, pentane, hexane, heptane or octane ) and may also be used for or registered as pesticides or fumigants. Most are dangerous wastes, either listed or categorical. Organic compounds with more carbons are almost always halogenated pesticides or a contaminant or derivative. Referral to the HSDB is recommended if you are unfamiliar with a chemical name or compound, as it contains useful information about synonyms, uses, trade names, waste codes, and other regulatory information about most toxic or potentially toxic chemicals.

**Dibenzodioxins and dibenzofurans** are normalized to a combined equivalent toxicity based on 2,3,7,8-tetrachloro-p- dibenzodioxin as set out in WAC 173-340-708(8)(d) and in the Evaluating the Toxicity and Assessing the Carcinogenic Risk of Environmental Mixtures using Toxicity Equivalency Factors Focus Sheet (<https://fortress.wa.gov/ecy/clarc/FocusSheets/tef.pdf> ). Results may be reported as individual compounds and isomers (usually lab results), or as a toxic equivalency value (reports).

**FOR ECOLOGY II REVIEWER USE ONLY (For Listing Sites):**

How did the Site come to be known: **Site Discovery (received a report):** \_\_\_\_\_ (Date Report Received)  
☒ **ERTS Complaint**  
☐ **Other (please explain):** \_\_\_\_\_

Does an Early Notice Letter need to be sent: ☒ Yes ☐ No  
If **No**, please explain why: \_\_\_\_\_

**NAICS Code (if known):** \_\_\_\_\_  
**Otherwise, briefly explain how property is/was used (i.e., gas station, dry cleaner, paint shop, vacant land, etc.):**

**Site Unit(s) to be created (Unit Type):** ☒ Upland (includes VCP & LUST) ☐ Sediment

If multiple Units needed, please explain why: \_\_\_\_\_

**Cleanup Process Type (for the Unit):** ☒ No Process ☐ Independent Action  
☐ Voluntary Cleanup Program Federal- Ecology-supervised or conducted  
☐ supervised or conducted ☐

**Site Status:** ☒ Awaiting Cleanup ☐ Construction Complete – Performance Monitoring **Model Remedy Used?**  
☐ Cleanup Started ☐ Cleanup Complete – Active O&M/Monitoring **If yes, was this a**  
☐ No Further Action Required **transformer spill?**

**Site Manager (Default: Southwest):** Southwest \_\_\_\_\_

**Specific confirmed contaminants include:** \_\_\_\_\_ **Facility/Site ID No. (if known):**

\_\_\_\_\_ 30623 \_\_\_\_\_  
\_\_\_\_\_ in Soil \_\_\_\_\_  
\_\_\_\_\_ 15544 \_\_\_\_\_  
\_\_\_\_\_ in Groundwater \_\_\_\_\_  
\_\_\_\_\_ in Other (specify matrix: \_\_\_\_\_ )

COUNTY ASSESSOR INFO: Please attach to this report a copy of the tax parcel/ownership information for each parcel associated with the site, as well as a parcel map illustrating the parcel boundary and location.

**Additional or Supplemental Information from Observations Page**

Please use this box for any text that requires special formatting

**From:** Michelle Mood <moodm@kenyon.edu>  
**Sent:** Monday, February 6, 2023 2:16 PM  
**To:** City Clerk's Office  
**Subject:** Written Comment on STGPD Moratorium

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I am writing with comments on the South Tacoma Groundwater Protection District Moratorium proposal. Please pass this moratorium and consider strengthening it to become legally compliant. As it now stands it has lost the focus the people of Tacoma have asked for, even as the city has been grievously negligent regarding actual pollution of the South Tacoma Groundwater Protection District (the citizen-discovered and city-confirmed oil leaking into it by Sutter Metal, confirmed by joint investigation by the City of Tacoma Environmental Compliance and TPCHD). There is robust evidence that the city is grievously negligent when it comes to city legal responsibilities surrounding the South Tacoma Groundwater Protection District, and this moratorium is a travesty of decision-making that is both incomplete and ascientific. This moratorium was originally proposed to prevent additional impervious surface construction and protect aquifer recharge until the groundwater code had been updated. The moratorium was to allow time for the city to model effects on the groundwater regional infiltration and recharge, to research water quality as well as quantity, and to update the legally out of date groundwater code – all of which would allow the city to have the time to use expert best science to guide management of the legally protected critical areas of STGPD.

RCW 36.70A.030(6) requires that the city maintain scientific, accurate, protective does for their critical areas. So far this has been woefully neglected for the STGPD.

We need clear language about protecting recharge and infiltration. We need clear moratorium on polluting industries such as auto mechanics. Only a single business owner commented on this moratorium, while many citizens have engaged the city over these concerns. We have presented clear, cogent, scientifically-supported points. Please take heed.

In addition, a move to make compliance more restrictive, punitive, and expanded is also a desired code amendment update. Placing faith in "voluntary compliance" is obviously not working - Sutters Metal being a perfect example.

There are thousands of potential points for pollution, and various agencies have responsibility for monitoring compliance. These include Washington State Department of Natural Resources (1 site), Washington State Department of Agriculture (9 sites), Washington State Department of Ecology (1374 sites), as well as Pierce Conservation District, Pierce County Public Works and Utilities, and TPCHD (which has jurisdiction over the companies in the area). An additional 1106 sites have no regulatory agency in charge of them. All of these relevant agencies should be included in any evaluation of the STGPD, in code updating, and in this moratorium, but were not. We need comprehensive and careful monitoring and decision-making related to this, and this can only happen with active involvement of all stakeholders and regulatory agencies.

These concerns are largely going unmet in the current moratorium. No scoping for the groundwater code update is included – it must be. Required agencies and stakeholders have not been consulted – they must be. Aquifer hydrology has not been modeled according to best science, leaving our future uncertain and putting the people and the city at risk – such modeling must occur. Aquifer recharge has been repeatedly requested and denied – it must be included. The Planning Department has an escape clause to allow exception to the moratorium at the Planning Department's discretion – that must be removed. Include the above-mentioned relevant agencies and eliminate voluntary compliance. The city must move to make sure our groundwater is protected and complies with the law. Please pass this and consider crafting a stronger and a scientifically sound Moratorium.

Dr. Michelle S. Mood (she, her, hers)



(c) 740-233-6333  
3719 South Gunnison St  
Tacoma, WA 98409

*A boomer, not a zoomer.*

**From:** Cathie Raine <cjrRD@hotmail.com>  
**Sent:** Monday, February 6, 2023 3:02 PM  
**To:** City Clerk's Office  
**Subject:** This comment is for the February 7th City Council meeting: Moratorium concerning the 'South Tacoma Groundwater Protection District' (STGPD) ' initially proposed by the South Tacoma Neighborhood Council.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

This moratorium is necessary especially at this time...as a 'pause' due to:

1. Concerns with the current system used for monitoring of a business' compliance with protecting the water quality. A consistent system of science-based monitoring of potentially hazardous chemical spills is not yet in place (i.e. Sutter Metals is just one example). Continued pollution of our aquifer is likely to continue with the City of Tacoma's current non-science based approaches with the handling of business practices regarding the environment and public health
2. Updates with the STGPD is very overdue and necessary for protection of the quantity and quality of our water. A 'moratorium' would provide the pause needed to allow a COMPREHENSIVE update with the STGPD.
3. The water quantity and quality issues in the City of Tacoma have an impact on the health of the Puget Sound. This is a time..with the future of our environment and economy..to evaluate changes to the STGPD based on sound science from nationally recognized experts in the field of hydrogeology.

The 'Puget SOS Act' was passed by the House and Senate as part of the 'National Defense Authorization Act for 2023'. "This new law (signed by President Biden on 12/23/22) aims to enhance the federal government's role and investment in the Puget Sound, the nation's largest estuary by volume and the heart of Washington state's identity and economic engine". With this 1/27/23 Press Release from Representatives Derek Kilmer and Marilyn Strickland (Co-Chairs of the 'Puget Sound Recovery Caucus'): this " 'Puget SOS Act' demonstrates the federal government stepping up and treating Puget Sound the same way other bodies of water of national significance are treated". 'It's not just about environmental protection, but, about our region's economy as well"... "Hundreds of thousands of jobs and billions in economic impact". (From: The Suburban Times'...1/27/2023 "Representatives Kilmer and Strickland Celebrate New Puget Sound Recovery Law in Tacoma").

The 'STGPD'-related water quality and quantity amounts need to be protected! Comprehensive updates are needed to the STGPD that include:

- \* best scientific recommendations from independent, nationally-recognized hydrogeologists,
- \*input from ALL stakeholders
- \*consideration of long range planning with the 'environmental health' of Puget Sound waters as a priority.

We need to keep in mind that further pollution (even 'accidental, unintended types') DOES have an impact on our economy in the long run. An updated, well-organized, consistent process is overdue!

A 'moratorium' for the STGPD would be a crucial first step with this process!

Respectfully submitted,  
Cathie Urwin

**From:** Chad Sutter <chad@suttermetals.com>  
**Sent:** Monday, February 6, 2023 3:13 PM  
**To:** City Clerk's Office  
**Subject:** Sutter Metals OPPOSES Proposed Moratorium in STGPD (Public Hearing)  
**Attachments:** L-PublicOpinion.PropMoratorium.02062023.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To Whom It May Concern:

Sutter Metals opposes the Proposed Moratorium in STGPD. Please read our company statement below.

Always happy to discuss - please reach out directly via mobile phone 360-628-4470 or by email.

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Chad E. Sutter  
Owner  
Sutter Metals LLC  
O: 360-456-4974  
F: 360-456-0545

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# Sutter Metals

5312 South Burlington Way  
Tacoma, WA 98409  
253-533-6253

February 6, 2023

**TRANSMITTED VIA ELECTRONIC MAIL**

**[cityclerk@cityoftacoma.org](mailto:cityclerk@cityoftacoma.org)**

Tacoma City Council  
c/o Tacoma City Clerk  
733 Market Street, Room 11  
Tacoma, Washington 98402

Re: Public Hearing - Tuesday, February 7, 2023  
Proposed Moratorium on Underground Storage Tanks and Metal Recycling/  
Auto Wrecking with South Tacoma Groundwater Protection District

Dear Mayor Woodards and Councilmembers Hines, Rumbaugh, Blocker, Ushka, Bushnell, Daniels, Diaz, and Walker:

We are the owners of Sutter Metals. We opened a metal recycling facility in July of 2020 at 5312 South Burlington Way in South Tacoma after undergoing an extensive permit process with the City of Tacoma. We write in strong opposition to any proposed moratorium within the South Tacoma Groundwater Protection District which would impair the substantial investment we have made in our Tacoma location and constrain its future responsible growth.

As a preliminary matter, it is clear to us that inclusion of metals recycling facilities in the scope of proposed moratorium is based on inaccurate information and assumptions about our operation. To that end, we would like to set the record straight for the Council.

In late 2020, shortly after we opened, heavy area rainfall events sparked concern about the adequacy of our existing approved stormwater system. After consulting with our site engineer, we decided to add an oil/water coalescing plate separator ("CPS") to enhance the original system. Pending installation of the CPS, we placed a drain plug to capture and hold stormwater and prevent flow of potentially contaminated water to groundwater.

Unfortunately, installation of the CPS was delayed by circumstances well beyond our control - first by the global shipping disruption during blockage of the Suez Canal in March 2021, and thereafter by supply chain delays associated with the global COVID-19 pandemic.

In April 2021, while installation of the CPS was pending, an ERTS complaint was filed noting an illicit discharge of oil-containing fluid material onto adjacent railroad property. We took immediate action to clean and dispose of contaminated soil, and the City proposed recommended improvements and procedures to prevent further discharge, which we implemented. Installation of the CPS and remaining stormwater facility improvements were completed shortly thereafter. This April 2021 ERTS complaint is the only documented complaint against our Tacoma operation.

We routinely test output from our stormwater system in compliance with our permits and City requirements. The first test in 2022 identified the presence of oil and lead, although other benchmarks were met. Upon review, we determined part of the challenge is that there is no way to test for contaminants after stormwater exits from the ground, which provides further treatment before it reaches groundwater. This is a critical step to understanding the true impact (if any) of our business operations and our engineered systems on groundwater.

City regulators concur that this is a challenge. In our view, the best indicator of the impact of our business is the results obtained from testing at the water table, which shows the quality of potential drinking water. City staff have shared test results which show that every quarter since we opened in July 2020, the results are unchanged. These test results imply that the existing treatment system at our facility is working as intended.

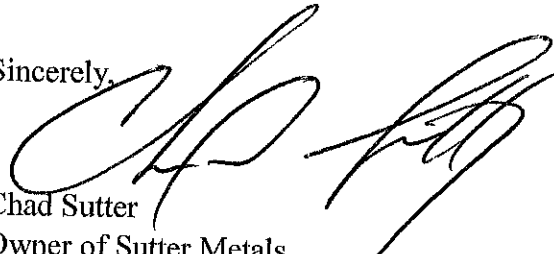
Despite there being no proof that our operation is having an adverse impact to groundwater, we have heard significant outcry from neighbors that our existing stormwater system is “archaic” and “ineffective,” and so we added a capital project to construct an above-ground water treatment facility. This new facility will include technology designed to complement our existing system while adding enhanced treatment on site using a system of large tanks that provide solid separation, electro-coagulation and ultra-filtration. This system is expected to improve detection from parts-per-million to a parts-per-billion, and is specifically designed to process gas, oil and other metals.

The additional stormwater system represents a significant additional capital investment, which we have undertaken in good faith to address neighborhood concerns. The project is expected to be completed in the next sixty days. We have also invested an additional \$100,000 into constructing covered storage for a critical processing area. This additional infrastructure should help reduce the volume of contaminants entering the treatment system and avoid future benchmark exceedances.

We have made a considerable investment in our business and have voluntarily made additional investments in improvements designed to ensure long-term compliance with all applicable water quality regulations. Our permit with the South Tacoma Ground Water Protection District is in good standing. There is simply no basis for the City to target our operation with a moratorium which will impair the value of our business as well as our ability to responsibly grow it in the future. We therefore respectfully request that the Council decline to impose such a moratorium.

Thank you for the opportunity to provide public comment. We are proud of our work, and welcome any of you to tour our facility and operation. Please reach out directly to the Owner Chad Sutter at [chad@suttermetals.com](mailto:chad@suttermetals.com).

Sincerely,

A handwritten signature in black ink, appearing to be 'Chad Sutter', written over a horizontal line.

Chad Sutter  
Owner of Sutter Metals

**From:** Heidi S. <heidigs@hotmail.com>  
**Sent:** Monday, February 6, 2023 4:19 PM  
**To:** City Clerk's Office  
**Subject:** Public Comments RE: Proposed STGPD Moratorium  
**Attachments:** Malach Consulting Moratorium Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

RE: Proposed Moratorium within the South Tacoma Groundwater Protection District  
For Public Hearing, Feb. 7, 2023

Mayor Woodards and Tacoma City Council,

Please pass the proposed moratorium, but strengthen it to include no exceptions to new or expanded metal recycling/auto-crushing within the South Tacoma Groundwater Protection District.

Please also note that residents have repeatedly called for inclusion of infiltration/recharge into this moratorium (see numerous past public comments regarding impervious surface limits) to address the city's continually overlooked critical preservation requirement of protecting "quantity" of groundwater.

As an example, Pierce County is in the process of updating their Critical Areas Ordinance, which notably includes

- *Wetlands*
- *Critical Aquifer Recharge Areas (CARAs)*

*Under Washington State Law, all counties and cities in the state must conduct a periodic review and update of their critical areas regulations. This periodic update provides an opportunity for the County to make sure our regulations are consistent with federal and state policies, and incorporate scientific advancements related to environmental conservation and natural hazards.*

*Best Available Science Review*

*Pierce County has produced a report on the "Best Available science" that will be incorporated into these regulations.*

***Jurisdictions must document scientific sources that inform regulations or explain why policies depart from science.***

<https://www.piercecountywa.gov/DocumentCenter/View/121377/CAO-BAS-and-Gap-Analysis-report-23?bidId=>

We have submitted expert input and requested best science data, but perhaps these memes will better help explain why preserving our last natural areas and restoring wetlands is critical (which this city has been informed of for decades, such as in the 1985 "South Tacoma Plan"):



# WETLANDS IN A NUTSHELL

**35%**

of our planet's carbon is stored in **6% of the Earth's surface** - our wetlands.



**40%**

of the world's **biodiversity** live or breed in wetlands.

WETLANDS

STORE

**225BN**

METRIC TONNES (MT)  
OF CARBON  
GLOBALLY.



This is equivalent to carbon emissions from **~189 million cars every year.**



OVER

**200**

**new species of freshwater fishes** are discovered every year in wetlands

**1MN**

**Threatened species** are dependant on wetland ecosystems for survival.



WETLANDS PROVIDE

**\$47TN**

worth of ecosystem services every year - **twice the size of the US economy.**

**1BN**



People worldwide depend directly on wetlands for their **livelihoods, and food & fresh water supply.**



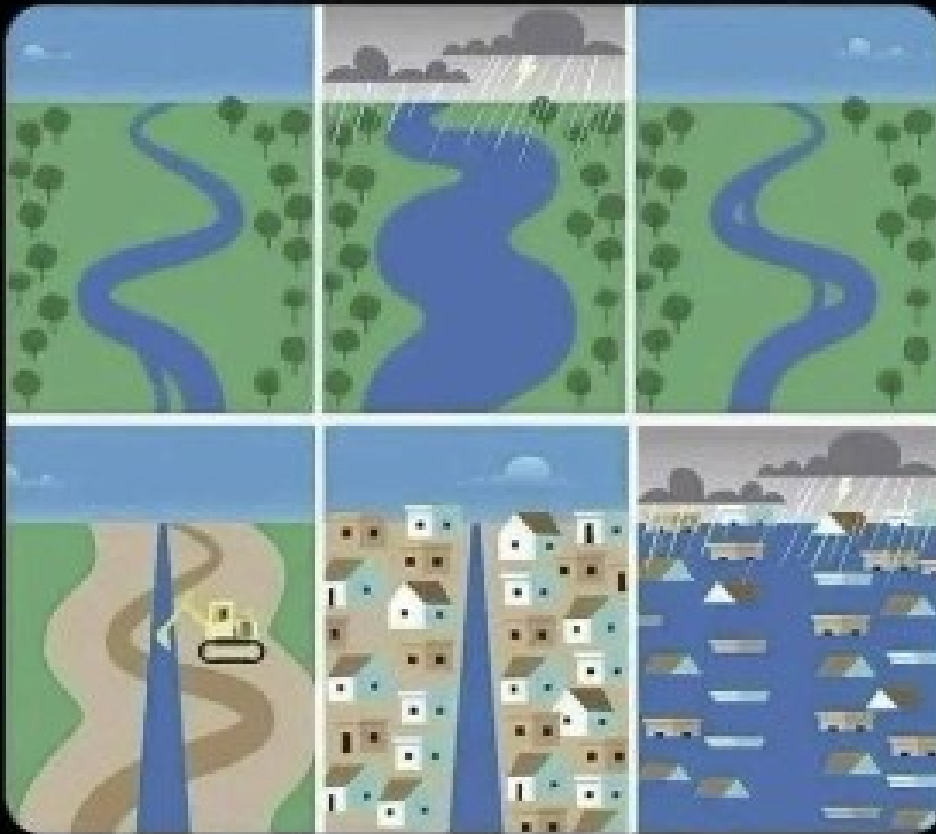
**1-1.5MN**

gallons of floodwater can get stored in just about **one acre of wetland area.**

#WeNeedWetlands



# Wetlands:



Quotes from the "**South Tacoma Plan, City Planning Department, September 1985**" which unfortunately the city has not followed-through with, but needs to:

Excerpts from: "**Goals, Policies, Intentions and Recommendations / Groundwater Protection**"

*A clear relationship exists between uses of land and the quality of groundwater.*

*Because of the high permeability of the soils in the South Tacoma area, the groundwater is extremely vulnerable to contamination...*

*Certain classes of industry and some businesses which represent a clear threat to the aquifer system due to the nature of the material stored, utilized or processed at the facility could be restricted or prohibited...*

*A phased elimination of existing potential pollution-generating businesses may be sought.*

*It will be important to control existing development through strict hazardous material regulations.*

*Rainfall replenishes the aquifer in a process known as recharge. Land developed with impervious surfaces (areas which water can not penetrate to reach the groundwater) can impact the quantity of groundwater. Preserving as much natural area to recharge the aquifer as is feasible is also desirable to ensure an adequate supply of water.*

*Capital improvements (i.e. land acquisition around public water supply wells' area of influence) and the development of recharge areas may also be considered.*

*As technology advances and more information is made available, other actions may be necessary. It is intended that the City continue to strenuously pursue all possible methods to have a safe and pure water supply.*

*It is extremely important that any new regulations be carefully developed... be used to attract clean business and industry and to safeguard one of the City's vital assets - its plentiful and safe water supply.*

*These measures will assist in protecting the public health and safety through **preservation and maintenance of the existing groundwater supply and quality**, and in protecting the City of Tacoma from costs which may be incurred if either the quality or quantity of this important public water source were adversely affected.*

Sadly Tacoma seems to instead be going backwards, ignoring current best science and continually allowing for known polluting/damaging industry within this environmentally sensitive area.

From that same 1985 document's **"Policies and Recommendations"**

*Protect and preserve the **quantity and quantity** of Tacoma's groundwater supply.*

*Encourage the retention of sufficient **natural areas** to maintain a balance between development and the need for adequate recharge of the aquifer in order to assure a continued adequate groundwater supply.*

***Recommendation: Consider an impervious surface ratio for different categories of land use to preserve as much natural recharge to the aquifer as possible.***

I am again including the memo from hydrologist Steven Emerman who notes the many unaddressed issues which should prompt immediate pause of permitting for large impervious pavement within the South Tacoma Groundwater Protection District. [See attachment from Malach Consulting]

The first question of this council should not be how businesses are affected, but how the groundwater/aquifer is affected. If the answer not known, then the only action should be to stop. In fact, in 1985 the Planning Department had suggested also considering "restrictions or controls regarding the household storage, use, handling and disposal of toxic or hazardous materials" but even the current TMC Critical Areas Preservation 13.11 does not seem to be appropriately followed. These are all reasons to pause permitting until practices within the STGPD are brought up to best science.

So I have concerns about the recent addition of "allowing businesses to conduct normal maintenance and repair activities as well as conduct reasonable site or facility improvements for the purpose of improving groundwater protection or compliance with environmental standards"... The example that a new Sutter Metals canopy would have had anything to do with past or future oil spills simply does not correlate, and I fear further exceptions will be made to allow for expansions. If businesses are not meeting the requirements of what they were originally permitted for, then they should certainly not be allowed to expand. More likely they should never have been allowed to be located within the STGPD in the first place, thus should cease operation within this critically important area until they are compliant, not rewarded with expansions.

Most importantly, this very limited moratorium review cannot possibly be considered as "scoping" for the code update, when so much more and significant information has not been appropriately addressed or even touched upon yet.

Thank you,  
Heidi Stephens



**Steven H. Emerman, Ph.D.**

Specializing in Groundwater and Mining

shemergen@gmail.com • (801) 921-1228  
785 N 200 W, Spanish Fork, Utah 84660, USA

November 29, 2022

Heidi Stephens  
South Tacoma Economic Green Zone  
E-mail: [heidigs@hotmail.com](mailto:heidigs@hotmail.com)  
Tel: (253) 671-8232

Dear Ms. Stephens,

I am writing to respond to the following question from you: Should the proposed moratorium on heavy industrial uses and storage of hazardous materials within the South Tacoma Groundwater Protection District include a moratorium on the construction of large impervious surfaces (greater than 10,000 square feet)? I understand that the purpose of the moratorium is to pause further development and possible groundwater degradation while awaiting an update of the South Tacoma Groundwater Protection District Code, as well as any new hydrogeologic studies that will form the basis for the update.

My answer is yes. The proposed moratorium should include a pause on the construction of any new large impervious surfaces (greater than 10,000 square feet). Before explaining my reasoning, I will first review my professional background and then the materials I reviewed in order to answer your question.

I have a B.S. in Mathematics from The Ohio State University, M.A. in Geophysics from Princeton University, and Ph.D. in Geophysics from Cornell University. I taught hydrology and geophysics at the university level for 31 years, including teaching as a Fulbright Professor in Ecuador and Nepal, and I have over 70 peer-reviewed publications in these areas. Since 2018 I have been the owner of Malach Consulting, which specializes in evaluating the hydrogeologic impacts of proposed and existing large-scale development, especially urban development, mining, and timber harvesting. I have evaluated proposed and existing large-scale development projects in North America, South America, Europe, Africa, Asia and Oceania, and I have testified on issues of water and large-scale development before the U.S. House of Representatives Subcommittee on Indigenous Peoples of the United States, the European Parliament, the United Nations Permanent Forum on Indigenous Issues, and the United Nations Environment Assembly. I am the Chair of the Body of Knowledge Subcommittee of the U.S. Society on Dams and one of the authors of Safety First: Guidelines for Responsible Mine Tailings Management.



**Steven H. Emerman, Ph.D.**  
Specializing in Groundwater and Mining

shemergen@gmail.com • (801) 921-1228  
785 N 200 W, Spanish Fork, Utah 84660, USA

Prior to writing this memo, I reviewed the following materials:

- 1) Power Point presentation from July 27, 2022 entitled “South Tacoma Groundwater Protection District: Consideration of a Moratorium on Heavy Industrial Uses and Storage of Hazardous Materials”
- 2) Video of meeting of South Tacoma Groundwater Protection District on July 27, 2022
- 3) Video of meeting of Infrastructure, Planning and Sustainability Committee on November 9, 2022
- 4) Video of meeting of Tacoma City Council on November 15, 2022
- 5) Video of meeting of Tacoma City Council on November 22, 2022
- 6) Video of City of Tacoma Virtual Forum on November 22, 2022

I am in favor of a moratorium on the construction of large impervious surfaces because the hydrogeologic knowledge that could predict the impact of such construction appears to be non-existent. Thus, there is no basis for excluding large impervious surfaces from the proposed moratorium. The development of such hydrogeologic knowledge should form the basis for the update of the South Tacoma Groundwater Protection District Code.

Therefore, the inclusion of the construction of large impervious surfaces in the moratorium is perfectly in alignment with the purpose of the moratorium, which is to prevent further groundwater degradation while hydrogeologic knowledge is developed and the groundwater protection code is updated.

I understand from the meeting of the Infrastructure, Planning and Sustainability Committee on November 9 that, currently, the only industries that are being considered for inclusion in the moratorium are underground storage tanks, automotive crushing, metal recycling, and automotive service and repair. The first three industries in the list have a long history of groundwater pollution globally, but I am not familiar with their particular history in South Tacoma. The inclusion of automotive service and repair is somewhat surprising since this industry tends to be highly regulated at the local, state and federal levels. In addition, many automotive service and repair businesses are franchises and follow strict franchise regulations. However, I am not familiar with the particular history of groundwater pollution by automotive service and repair businesses in South Tacoma.



**Steven H. Emerman, Ph.D.**

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785 N 200 W, Spanish Fork, Utah 84660, USA

The following is a partial listing of the critical questions that apparently cannot be answered based on existing hydrogeologic knowledge:

- 1) What is the current groundwater recharge rate of the South Tacoma Aquifer through the South Tacoma Groundwater Protection District? Note that this is a very different question than asking about the current groundwater recharge rate through the entire catchment area of the South Tacoma Aquifer, which appears to be reasonably well-known.
- 2) What would be the rate of replenishment of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District if the groundwater recharge through the South Tacoma Groundwater Protection District were significantly restricted?
- 3) What is the functional dependance of the groundwater recharge rate of the South Tacoma Aquifer through the South Tacoma Groundwater Protection District on the quantity of impervious surface within the South Tacoma Groundwater Protection District?
- 4) What is the functional dependance of the water table of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District on the quantity of impervious surface within the South Tacoma Groundwater Protection District?
- 5) What will be the impact of climate change on the recharge rate and water table of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District?
- 6) What will be the combined impacts of climate change and an increase in the quantity of impervious surface in the South Tacoma Groundwater Protection District on the recharge rate and water table of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District?
- 7) What will be the impact of population growth on the recharge rate and water table of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District?
- 8) What will be the combined impacts of population growth, climate change, and an increase in the quantity of impervious surface in the South Tacoma Groundwater Protection District on the recharge rate and water table of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District?





**Steven H. Emerman, Ph.D.**

Specializing in Groundwater and Mining

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- 9) How will climate change and population growth affect the availability of water in the Green River?
- 10) How will a change in the availability of water in the Green River affect the demand for groundwater from the South Tacoma Aquifer?
- 11) What will be the combined impacts of a decrease in the availability of water from the Green River, population growth, climate change, and an increase in the quantity of impervious surface in the South Tacoma Groundwater Protection District on the recharge rate and water table of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District?
- 12) How will changes in the groundwater recharge rate or the water table of the South Tacoma Aquifer affect the water quality of the South Tacoma Aquifer beneath the South Tacoma Groundwater Protection District?

In summary, the proposed moratorium should include a prohibition against the construction of large impervious surfaces. In fact, the moratorium will be an ideal opportunity to fill the preceding gaps in hydrogeological knowledge prior to making critical decisions regarding the future of the South Tacoma Aquifer.

Please do not hesitate to contact me if I can answer any further questions.

Sincerely,

*Steven H. Emerman*

Steven H. Emerman



**From:** Janeen Provazek <provaj@hotmail.com>  
**Sent:** Monday, February 6, 2023 4:44 PM  
**To:** City Clerk's Office  
**Subject:** For the record re the Moratorium  
**Attachments:** Document.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please be sure this is sent to Mayor Woodards and all council members. Thank you so much, Janeen Provazek

Get [Outlook for iOS](#)

Dear Mayor Woodards and City Council Members,

I am speaking to the Moratorium that is being considered. As a reminder, the initial purpose of this Moratorium was to “slow down” development and permitting near the STGWPD in order to update zoning and codes and bring in outside experts to provide an adequate and “best Science based study” of what may be needed to protect this precious water source and the infiltration recharge.

Since then, the Moratorium has been so “watered down” it raises huge flags about future contamination. I support this Moratorium because it is our only choice. However, **it needs to be much stronger.**

Currently, this ground water protection district is being contaminated by Sutter’s Metal. Oil is leaking into an area in the South Tacoma field that had been remediated to “near residential levels”. Now this area is toxic.

Sutter’s Metal is a good example of how inadequate oversight and naïve trust in a for-profit company’s promise to build leak-proof infrastructure, has resulted in this environmental contamination. Community members had warned the city about the potential contamination from a company like Sutter’s Metal. The warnings were dismissed, and here we are.

We must be more thoughtful and environmentally astute when making decisions that affect our water sources, and the quality of our air and land.

The groundwater code calls for protection of aquifer volume. However, the city is not addressing this with any current, best Science.

Please do not allow the Planning Department to allow exceptions at their discretion when considering development proposals. They have not been responsive to environmental concerns and the resultant threat to public safety. This has not been their strong suit. We are in the middle of a serious climate crisis and they seem rather oblivious to this. Hence, their quiet willingness to begin the permitting process for Bridge Industrial, apparently without any red flags being raised by them—or any other city officials.

Respectfully, Janeen Provazek

**From:** Larchmont Cares <larchmontcares@gmail.com>  
**Sent:** Tuesday, February 7, 2023 2:57 PM  
**To:** City Clerk's Office  
**Subject:** Public Hearing 23-0038

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mayor & City Council,

I am writing in support of the South Tacoma Groundwater Protection District Moratorium, however I ask that before passing this that you **make it stronger**. The public came to you initially calling for this moratorium to put impervious surface limits to protect infiltration recharge. The city's groundwater code calls for protection of aquifer volume; however the city is not addressing this with any current best scientific practices. Our aquifer recharge areas are very critical areas of the city.

I ask that you review several parts of the Tacoma Municipal Code again before voting on this moratorium as it stands now and **add back in temporarily suspending approving permits that would cover large areas of impervious surface until more research can be done and the code can be updated to protect infiltration recharge**.

Section 13.06.070 D. South Tacoma Groundwater Protection District

**2. The South Tacoma groundwater aquifer system serves as a significant source of drinking water for the City of Tacoma. It may supply as much as 40 percent of the City's total water demand during periods of peak summer usage.** For future growth, supplemental supply, and emergency response, **this resource will continue to be extremely important to the City of Tacoma.**

It has been found and determined that a major cause of historical groundwater contamination in the South Tacoma aquifer system is from accidental or improper release of hazardous substances from spillage, leaks, or discharges from local industry. Due to the large number of potential sources of toxic and hazardous substances within the area which recharges the aquifer system and the possibility of further contamination, the City of Tacoma found that it was necessary and in the public interest to establish the South Tacoma Groundwater Protection District in 1988.

The South Tacoma Groundwater Protection District is an overlay zoning and land use control district specifically designed to prevent the degradation of groundwater in the South Tacoma aquifer system by controlling the handling, storage and disposal of hazardous substances by businesses. **The overlay zoning district imposes additional restrictions on high impact land use development in order to protect public health and safety by preserving and maintaining the existing groundwater supply** for current and potential users and to protect the City of Tacoma from costs which might be incurred if unsuitable high impact land uses were to reduce either the quality or quantity of this important public water supply source

Section 13.11.120 states "**Many of the critical areas in Tacoma have been lost or degraded through past development.**" Let's not let this continue when we have the opportunity right now to save this important resource of ours that we are so lucky to have here in the City of Tacoma.

While reviewing TMC Section 13.11.120 pay special attention to Part B where it states the following:

B. Because of the ecological benefits of critical areas, their past destruction, and the increasing pressure to develop them, **the intent of this chapter is to ensure that the City's remaining critical areas are preserved and protected** and that activities in or adjacent to these areas are managed. The preservation standards are provisions designed to protect critical areas from degradation. These criteria and standards will secure the public health, safety, and welfare by:

and item #2:

**2. "Maintaining healthy, functioning ecosystems through the protection of ground and surface waters, wetlands, and fish and wildlife and their habitats, and to conserve biodiversity of plant and animal species."**

and item #3:

3. "The City of Tacoma shall require use of all practical methods and procedures for protecting groundwater, while encouraging appropriate commercial and industrial uses to locate and conduct business within the South Tacoma Groundwater Protection District."

**However the city itself is not protecting our groundwater by ignoring the public's cry for them to do something about the aquifer's ability to recharge.**

I appreciate your time and consideration of my comments on this extremely important subject.

Sincerely,  
April Smith