

From: [Sam H.L.](#)
To: shirley.schultz@cityoftacoma.org; [Tamboer, Noel C. \(ECY\)](#); [Tamboer, Noel C. \(ECY\)](#); [ECY RE WOIA NOI \(WO\)](#)
Subject: Bridge Industrial Project and Sierra Construction Company
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May 7, 2022

Noel Tamboer,
Department of Ecology
Water Quality Program, Construction Stormwater

PO Box 47696. Olympia, WA, 98504-7696
&
Shirley Schultz,
Principal Planner,
747 Market St, Room 345, Tacoma, WA, 98402

RE: Bridge Industrial Project and Sierra Construction Company seeking coverage under Construction Stormwater NPDES and State Waste Discharge General Permit

Ms. Tamboer & Ms. Schultz,

I am writing to notify you both:

I strongly oppose permitting of this project, due to impacts to the South Tacoma aquifer and watershed to downstream creeks.

First, no environmental determination under SEPA has been issued by the City of Tacoma. No permits should be issued for this project while the environmental review is still underway. Additionally, no permits should be issued until the South Tacoma Groundwater Protection District (STGPD) is updated to current best science.

Second, this proposed project should not be permitted under general permits such as Construction Stormwater NPDES and State Waste Discharge General Permit.

The applicant should be required to apply for two Individual Permits:

1. National Pollutant Discharge Elimination System (NPDES)
2. State Waste Discharge Permits (SWD).

This is an important municipal water supply and due to its unique environmental characteristics and vulnerabilities, including:

- Critical aquifer recharge area, designated environmentally geohydrologically sensitive
- Wetland and stream critical area
- Watershed to Flett Creek and Chambers-Clover Creek
- Superfund site in various stages of remediation
- This aquifer is capable of providing up to 40% of Tacoma's backup water supply.

The submitted Storm Water Site Plan refers to Tacoma's storm water management plan, but requires compliance to state and federal requirements, as well as applicable pretreatment requirements since the project site is located in an aquifer sensitive area. The city staff comment only mentioned: "Additional information required about impacts to STGPD from paving (water quantity)"... yet the only hydrogeologic assessment regarding aquifer infiltration recharge is of a smaller proposed project from 2007, so not only needs to be made current but also brought up to scale.

I am concerned that this project will have significant impacts on the aquifer and important water resources. I believe a full Environmental Impact Statement is necessary to address these impacts, which the applicant failed to address in their SEPA checklist. I'm asking that Ecology not issue any storm water permits for this project until the full SEPA process is complete.

The discharges from this project could obviously cause a measurable change in receiving water quality, and this project is not necessary or in the overriding public interest according to Tier II antidegradation requirements under WAC 173-201A-320. In fact, proceeding with this project could cause irreparable harm to the environment and public health.

South Tacoma residence suffer from some of the highest air pollution in the nation, highest illness and mortality rates in the county and is one of the lowest-income and diverse areas of this city (per the Tacoma Pierce County Health Department Health Equity statistics, as well as the Washington Environmental Health Disparities maps).

This project has significant environmental impacts, such as raising air pollution, noise pollution, light pollution, more dangerously congested traffic, and loss of green open space. This project heaps these impacts on already overburdened communities of color adversely impacting their health and safety. This is the definition of environmental racism.

Our community & my neighbors have not been adequately informed, and our neighborhood council has said for years and in 2021 tried to introduce a code amendment to create a Green Zone at the proposed site. The STNHC is still waiting for our requests through the processes the city requires. In the meantime it looks like the city is trying to push through this huge warehouse with nearly no environmental review or public knowledge.

While I understand the request of the Green Zone requires the collaboration of 2 other neighborhood councils, wouldn't it be better if the city government allowed all communities in Tacoma to collaborate for a safer, greener city that lasts? The STNHC wants 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 within South Tacoma. Lets get ahead of the curve by protecting our city and making it safer for future generations.

South Tacoma maybe poor but we care for our area and should be well informed and not left in the dark. The sheer size of this project, the huge amount of traffic, the semi trucks barreling down 56th St & S. Tacoma Way will and should classify this as a heavy industrial project and should allow all residence to be notified in a several mile radius vs 1000 ft. The aquifer alone should require notification to fall city of Tacoma residences that leave near the areas fed by the aquifer.

It should be the city's goal to give as many people as possible a say in its future, not limit awareness and rush a plan as impactful as this warehouse complex will be.

Please consider these concerns and deny the General Permit application. Please do not issue any permits until the SEPA process is complete. Please urge the City of Tacoma to require a full Environmental Impact Statement.

I am also requesting a public hearing be scheduled so the residence of this area and others can share their thoughts.

I request a written response and to be copied on any correspondence with the City regarding this project as I am a concerned member of the community.

Thank you for taking out of your day to read and consider the impact of the South Tacoma Neighborhood.

Lets go green for the community and not have our city council get green with greed.

Samantha Hughes-Lutge
South Tacoma Resident