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To: [ECY RE WOIA NOI \(WO\)](#); [Tamboer, Noel C. \(ECY\)](#); [Tamboer, Noel C. \(ECY\)](#)
Cc: [Ellen Floyd](#); [Julie Andrzejewski](#)
Subject: Warehouse complex
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Noel Tamboer, Department of Ecology
Water Quality Program, Construction Stormwater
P. O. Box 47696, Olympia, WA 98504-7696

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

Ms. Tamboer,

We, at Indivisible Tacoma, promote social, racial, economic and environmental justice through a lens of equity for all communities. Consequently, we strongly oppose permitting this warehouse 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. In addition, based on U.S. District Judge Marsha Pechman's recent ruling, Ecology has not applied appropriate updates to water quality standards and all permitting should be paused.

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: The National Pollutant Discharge Elimination System (NPDES) and 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

The submitted Stormwater Site Plan refers to Tacoma's stormwater management plan, but requires compliance to state and federal requirements as well as the applicable pre-treatment 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.

We are concerned that this project will have significant impacts on the aquifer and important water resources. We believe a full Environmental Impact Statement is necessary to address these impacts, which the applicant failed to address in their SEPA checklist. We're asking that Ecology not issue any stormwater 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 residents already 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.

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

We look forward to your response.

Thank you very much,
Indivisible Tacoma
Ellen Floyd, co-chair
Julie Andrzejewski, co-chair