

From: [Amy Weller](#)
To: [ECY RE WOIA NOI \(WO\)](#)
Cc: [Tamboer, Noel C. \(ECY\)](#); [Tamboer, Noel C. \(ECY\)](#)
Subject: Bridge Industrial Project
Date: Sunday, May 8, 2022 2:55:37 PM

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM - Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link

**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,

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

My name is Amy Weller. I am the Secretary of the Puget Sound Fly Fishers Club and a Licensed Veterinary Technician. I am not an environmental activist or have in-depth knowledge of this subject but I felt I needed to voice my opinion for once about the environment impact of our watersheds/rivers/streams and struggling salmon populations.

It seems that there is a continual advancement of construction with a lack of conservation of the environment. The more I learn about where our watersheds/rivers/streams are heading, the more concern I feel. My main focus is on our dwindling salmon population and water quality. It is at an epic level.

Since no environmental determination under SEPA has been issued by the City of Tacoma, there should be no permits issued for this project while the environmental review is still being done. As well as no permits issued until the South Tacoma Groundwater Protection District (STGPD) research is completed. Also, 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: 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 geo hydrologically 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 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 very 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 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.

These concerns are fully warranted for the request to 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.

And in the unfortunate event the permits are authorized, requiring the builder to reinforce/place aquifers and plant rain gardens below the facility and in strategic areas (like preserving wetlands in building zones)

I request a written response and to be copied on any correspondence with the City.

Thank you very much.

Amy Weller, LVT