



## Public Comments

**Meeting:** Wednesday, October 4, 2023

**Submittal:** Written comments received at [planning@cityoftacoma.org](mailto:planning@cityoftacoma.org)  
by 12:00 noon on the meeting day

**Subjects:** Comments are addressing the following Discussion Item(s) on the agenda:

**F2 – South Tacoma Groundwater Protection District Code Update**

**F3 – Home In Tacoma – Phase 2**

**No. of Comments:** Five (Four addressing F2; one addressing F3)



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¿Necesitas información en español? Cần thông tin bằng tiếng Việt? 한국어로 정보가 필요하십니까? ត្រូវការព័ត៌មានជាភាសាខ្មែរ?

Нужна информация на усском? Потрібна інформація українською мовою? ☎ Contact **TacomaFIRST 311** at (253) 591-5000.



**From:** [Dale Bickenbach](#)  
**To:** [Atkinson, Stephen](#)  
**Cc:** [Planning](#); [Barnett, Elliott](#); [McKnight, Reuben](#)  
**Subject:** Planning Water  
**Date:** Wednesday, October 4, 2023 10:29:20 AM

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This is hardly a review to complex challenges. Flattered, honored, and humbled to be able to provide comments, as the Planning Department Staff perform a vital service to the Citizens of Tacoma and beyond. I decided to put my statements in bold. Hope they assist the continuing process.

**-Promulgate/Inform Citizens/Property Owners of owner responsibilities to maintain property and requirements extending beyond property lines, to include distances.**

**-Overall, I would prefer more science cited as the determining factor.**

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“Review an initial comparison of critical aquifer recharge standards for Pierce County jurisdictions that have jurisdiction within the South Tacoma Aquifer with a focus on the following: Impervious Surface Standards, Landscaping Standards, and High Risk/High Impact Uses; and provide direction on the geographic scope of the amendments”

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-B. Options for Geographic Scope – **Favor Alternative! Conflict and coordinate with ‘Home in Tacoma’**

- “Overall, the City of Tacoma appears to be the most restrictive and comprehensive in uses that are outright prohibited within the STGPD”, - **Continue to be Most Restrictive**

- **Trees, wonderful; however, coordination within City workforce/departments is severely lacking. Citizens request, citizens get with promises of City watering. Citizens see City as a unified whole, not departments! No watering. Urban foresters plant without consideration of code compliance. Sidewalks broken and raised.**
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Interesting to view the two most important topics have no comments. I care for and study history; however water and living conditions are above keeping historic knowledge.

- **My comment on housing has been provided previously, and is the same. Following/implement passive house standards as done, now, in multiple North American locations should be emphasized and implemented.**
- **Two items are essential for life – The Sun and Water. No sun, which we cannot control, eliminates life. Water is essential for all life. We can control water quality and use. Protecting our water resources is a long term, not short term issue! Below, I have included the current drought reports for both Washington State and British Columbia. The**

**Cascades are increasing in height, the freezing level is. Snow makes our electricity and drinking water, currently.**

Historic Special Review and Conservation Districts Moratorium – Debrief

-29 comments written, 1 oral

South Tacoma Groundwater Protection District (STGPD) Code Update

-0 comments

Home in Tacoma – Phase 2

-0 comments

<https://www.mytpu.org/protecting-our-groundwater/>

“The wells in South Tacoma are supplied from an aquifer that extends as far south as the Roy and Fredrickson area.”

<https://www.tpchd.org/healthy-places/waste-management/business-pollution-prevention/south-tacoma-groundwater-protection-district>

<https://www.usgs.gov/centers/washington-water-science-center/science/pierce-county-groundwater>

[https://nwis.waterdata.usgs.gov/wa/nwis/gwlevels?search\\_criteria=county\\_cd&submitted\\_form=introduction](https://nwis.waterdata.usgs.gov/wa/nwis/gwlevels?search_criteria=county_cd&submitted_form=introduction)

<https://thrivingearthexchange.org/project/tacoma-wa/>

Viewed 24 September By Dale N Bickenbach, Author of This Message

<https://www.drought.gov/states/washington>

<https://www.seattletimes.com/seattle-news/environment/seattle-public-utilities-asks-customers-to-conserve-water-amid-drought/>

<https://www2.gov.bc.ca/gov/content/drought>

<https://www2.gov.bc.ca/gov/content/environment/air-land-water/water/drought-flooding-dikes-dams/drought-information>

Thanks.

dnb

Dale N Bickenbach

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+ 1 253 475 5242 (Please e-mail, first)

**From:** [Tim Smith](#)  
**To:** [Planning](#)  
**Cc:** [Atkinson, Stephen](#); [Moeinian, Maryam](#)  
**Subject:** Public Comment re: Scope of Amendments South Tacoma Groundwater Protection District (STGPD)  
**Date:** Tuesday, October 3, 2023 7:33:48 AM  
**Importance:** High

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Please include and publish these comments for the 04 OCT Planning Commission Meeting.

The agenda item for discussion and review is incomplete and fails to include all pertinent facts and details. What is put forth now is far, far from what is needed. Pervious surface limitations should apply to the ENTIRE STGPD not just a small part of the MIC. Sorry that this will involve more work, but the CARA extends far beyond the boundaries of the MIC.

Many other agencies have a place in this update and have not been included, for example - TPCHD, DOH, DOE, EPA, DFWS.

13.09.020 "Declaration of policy. In order that the City of Tacoma might maintain its groundwater resources within the South Tacoma Channel as near as reasonably possible to their natural condition of purity, it is the policy of the City of Tacoma to establish strict performance standards which will reduce or eliminate threats to this resource."

The South Tacoma Groundwater Protection District (STGPD) is an **overlay land use control** district specifically designed to prevent the degradation of groundwater in the South Tacoma aquifer system by controlling the use and handling of hazardous substances. The overlay district imposes additional restrictions on 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 development were to reduce either the quality or quantity of this important public water supply source.

The STGPD is a long-established OVERLAY protecting a most vital, recognized, Critical Aquifer Recharge Area and was created long before the Growth Management Act. The South Tacoma groundwater aquifer system serves as a significant source of drinking water for the City of Tacoma. It supplies as much as 40 percent of the City's total water demand during periods of peak summer usage.

As future growth and development occur, this resource will become increasingly important. It has been found and determined that a major cause of groundwater contamination in the South Tacoma aquifer system is from accidental or improper release of hazardous substances from spillage, leaks, or discharges. Due to the large number of potential sources of toxic and hazardous material within the area which recharges the aquifer system and the possibility of further contamination, the City of Tacoma found it necessary and in the public interest to establish the STGPD.

The intent of this overlay district is to provide supplemental development regulations in the area so designated to permanently protect this supplemental source of Tacoma's water supply from additional long-term contamination originating from surface land use activities. Due to the exceptional vulnerability and sensitivity of the aquifer system resource to contamination, it is the intent and purpose of this chapter

to safeguard groundwater resources in the aquifer system from hazardous substance pollution by controlling or abating pollution from existing commercial and industrial sources and by preventing future pollution from new or different land uses or activities.

The proposal for the current update of the district was proposed by the residents and the South Tacoma Neighborhood Council and they have been waiting now for over a year to be included in developing these code updates. We were told by the Planning Department that we were going to wait on the completion of further studies in June of 2023. Those studies are still outstanding and have not been shared with the community. Where are the other stakeholders? Why the lack of public input, comment, involvement?

Does the Planning Dept just want to remove this required overlay control, minimize it, and abandon decades of monitoring and protection of a critical resource? Seems like it and that would be a crime.

Vr,

Tim Smith

**From:** [Heidi S.](#)  
**To:** [Planning](#)  
**Subject:** Public Comments re: STGPD 10/4/23  
**Date:** Wednesday, October 4, 2023 10:34:06 AM

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Public Comments for 10/4/23 Planning Commission

Re: The South Tacoma Groundwater Protection District (STGPD) code update

Planning Commissioners,

Under "Geographic Scope" in the agenda packet, the Planning Staff offered two options:

- their "preferred option" (which once again badly limits groundwater review)
- or an "alternative"...

... however, this "alternative" was/is essentially the original proposed intent:

**STGPD is long overdue for a complete comprehensive code update to be done.**

... as submitted for the spring 2021 Annual Amendment Code ("STEGZ" calling for a full groundwater update) but now going-on nearly three-years-passed, while still only at this inadequate stage.

This is of concern due to steadily increasing reports of climate-change induced water shortages (recently in neighboring counties).

Tacoma is one of the few lucky cities to be blessed with an aquifer, but the City has not protected it appropriately.

Allowing outdated code will continue the harm.

Instead, there needs to be a full review (starting now) which will save time and cost by correlating with the Wellhead Protection Update, as well as state watershed and other studies on which to collaborate.

The up-coming Tacoma One comprehensive plan is also required to update critical area policy (which includes CARAs / critical aquifer recharge areas to the STGPD).

So, this is a very important time to be correlating with other updates for consistency and efficiency.

...and, after all, the area in question amounts to a fifth of Tacoma's land mass so should not continue to be put aside.

STGPD is needing a complete comprehensive code review of the entire protection district, to include:

- restrictions on impervious surfaces, not just in the MIC,
- reviewing the entire CARA feeding the South Tacoma aquifer,
- cross-updates to any other applicable codes/overlays (like Home in Tacoma and the Tacoma Mall Subarea Plan),

- outside subject-matter experts and all required agencies, which for years had not been included but should have been involved,
- no exceptions to policy or permitting,
- stronger protections and higher penalties for violations, because...

This is also a matter of environmental justice.

South Tacoma disproportionately suffers pollution from industrial zoning near our homes, schools, business and recreation areas, resulting in high illness and mortality rates for some of Tacoma's low-income most diverse residents -- a Health Impact Assessment (HIA) must also be required as part of this code update.

This latest "preferred option" would significantly weaken the appropriate scope of review even further (and, it's these kind of "preferred" attempts has gotten Tacoma into these dangerously outdated situations to begin with).

Please don't support the "easiest" plan, allowing for continued delays and dilution of the STGPD code update.

It's far beyond the time for a thorough update using modern-day best science.

Thank you for supporting the "alternate" (original) plan, for proper review of the entire STGPD area and issues, to commence asap.

Heidi Stephens  
Resident of South Tacoma



**From:** [Cathie Raine](#)  
**To:** [Planning](#)  
**Subject:** Public Comments for 10/4/23 Agenda Item: "STGPD Updates"  
**Date:** Wednesday, October 4, 2023 12:06:36 PM

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Dear Planning Commissioners,

The updates on the STGPD are long overdue... and comprehensive work is needed for this update that coordinate with other updates.

However, the STGPD updates need to be a coordinated effort drawing on expertise of other stakeholders with this process. Why are Planners of the PDS Dept (apparently) spearheading these updates? We have a history of 'exceptions' being made (by the PDS Dept) with approval of building permits in the STGPD area. These updates need to be handled by City of Tacoma staff not involved directly in the permit approval process. There is too much of a risk to our Aquifer with allowing the PDS Dept staff to continue to lead the updates process with STGPD (too much potential for 'exceptions' to continue... with decisions being made with approval of land use permits in the STGPD area).

Cathie (Raine) Urwin  
South Tacoma resident

**From:** [Esther Day](#)  
**To:** [Planning; City Clerk's Office](#)  
**Cc:** [Woodards, Victoria](#); [Ushka, Catherine](#); [Walker, Kristina](#); [jhhines57@gmail.com](#); [Bushnell, Joe](#); [Diaz, Olgy](#); [Daniels, Kiara](#); [Rumbaugh, Sarah](#); [Blocker, Keith](#)  
**Subject:** Home In Tacoma Phase 2  
**Date:** Wednesday, October 4, 2023 11:34:54 AM  
**Attachments:** [HIT Minority Report.pdf](#)

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Dear Planning Commission,

It is important that you realize that all this building of apartments is NOT CREATING AFFORDABLE HOUSING. It is also taxing our extremely old infrastructure. Our treatment plant is unable to handle all the sewage they treat and it is spewing contamination into our bay (according to information from a source), also, our city's actual infrastructure is so old, it is not able to handle all this construction.

You, however, are letting this happen without thoroughly researching all this before approving all this work. It is important to note that we also have short supply of water. Our water dept says that we are okay. I made comments to an IPS meeting sometime ago that the governor had come out, last year, and reported that Snohomish, King, and Pierce were okay waterwise. Okay? I indicated to Kristina that because the rest of the state was in drought and the lower southeast corner of the state was in severe drought long before his announcement – that if the governor deemed it necessary, water would be sent to those cities to help people stay alive. This happened to Arizona. The TPU person at the IPS meeting table said, “The waters can’t flow over the mountains.” How stupid can you get. Is this what we have working for us and making critical decisions? Water will be trucked!!!

I hope you have heard that the City of Bellevue and Kirkland have asked their residents to be careful and not use too much water. If you did not hear it, it was in the news. Check it out. [SPU Ask 1.5 Million People to Use Less Water to Stretch Region's Water Supply \(seattle.gov\)](#)

You need to know that we have lost 4 glaciers on Mt. Rainier that provide snow runoff water to our Green River. WATCH THE SCIENCE. This loss of glaciers is growing and we need to be careful not to build more than we can handle.

Also, we have reports of townhomes built in an old part of our community and when those townhomes use their water for washing, bathing or dishwashing at night, it is causing some homes to get the basements flooded and faucets coming on at night. That is pressure that the old infrastructure is undergoing because of the larger pipes feeding into the smaller community infrastructure pipes.

Sadly, WE THE HOMEOWNERS will be saddled with the bill to fix all this while these builders are building apartments that are getting tax exemptions. You have three previous colleagues on the Commission that wrote the HIT Minority Report – telling you and the city that this HIT program WOULD NOT create affordable housing. Yet, you still went with it and are destroying Tacoma.

I hope you also listen to the fact that we do not need Midscale along transit corridors. We need to have our City Council working to bring businesses to Tacoma instead of losing them. We must not be made a bedroom community to Seattle.

WE NEED HOMES, TOWNHOMES WITH DEFENSIBLE SPACE FOR HOMEOWNERSHIP SO THAT YOUNG PEOPLE AND OLDER PEOPLE WANTING TO DOWNSIZE BUT CONTINUE BUILDING WEALTH. THIS IS NOT BEING DONE WITH THIS PROCESS.

We need to make sure that contractors are putting in concrete walls between townhomes. This will help prevent a fire from extending to the adjacent homes. If our insurance agencies are up to speed with what is being done in other states, THEY CAN OFFER Homeowner's insurance instead of the costly Townhome Insurance.

Having served on the Planning Commission until 2000, I will tell you this – our Planning Dept representative encouraged us to make whatever changes were needed to make for the good of the people (not special interests). I was told this, "Esther, this is precisely what you as a Commissioner is supposed to do. You don't take what we present and do nothing. You make your changes that can be offered."

So, just because you are told that we have enough water and our

infrastructure is okay, DON'T BELIEVE IT. Check it out for yourselves. That is what you should be doing.

Save Tacoma, we don't need Midscale RENTAL along transit corridors to create customers for transit. WE need space for businesses and for homeownership opportunities – NOT RENTAL NOOSES ON OUR CITIZENS.

Sincerely,  
Esther Day

May 26, 2021

The Honorable Mayor and City Council  
 City of Tacoma  
 747 Market Street, Suite 1200  
 Tacoma, WA 98402

**RE: Home In Tacoma Project – Minority Report**

Honorable Mayor Woodards and Members of the City Council,

We, Commissioners McInnis, Edmonds and Givens, want to offer this Minority Report to provide an explanation for not fully supporting the *Home in Tacoma* Project. As is often the case in a complex issue like this, those that vote against it do so for differing reasons. In order to properly explain the reasons for the three ‘nay’ votes, I have categorized the reasons below and identified the dissenting commissioners that are in agreement. Suffice it to say, however, that the haste with which Home In Tacoma has been compiled and moved forward is a concern shared by all of us and the underlying reason for all of our itemized concerns below. This matter is much too important for us to get wrong.

Commissioners McInnis and Edmonds believe that the Home in Tacoma (HIT) plan will not respond to the affordable home crisis that we are experiencing in Tacoma. While HIT creates an environment in which additional housing can be created, the units that will be created are going to do very little for affordable housing. Both Vice Chair McInnis and Commissioner Edmonds have considerable experience in the real estate and development market. We understand the process that developers go through to evaluate a project. Projects that could be built for affordability typically require reduced development costs and are often built in areas with reduced real estate costs.

Those are not the types of developments that will be created by HIT because HIT does nothing to encourage developers to seek lower cost real estate nor does it provide any relief from “soft” development costs (permits, etc.). There are still significant development costs to overcome in these “market-rate” projects, and HIT does nothing to respond to that. The projects that will be created as a result of HIT will be those with sufficient revenue to allow payback in the timeline required by lenders.

For that reason, we will not see affordable development occur as a result of HIT. We will see more development in Tacoma, but it will be of the type that we have seen recently in the Proctor District – higher end developments with expensive rents. Little will be done to improve affordability. In the process, some historical buildings will necessarily be removed, the character of our neighborhoods forever changed, and we will still be faced with an affordability crisis.

We have an opportunity and responsibility to find real ways to provide affordable housing in Tacoma. Doing so well requires a much more detailed approach than a blanket policy affecting the entire City. It requires:

1. Finding ways to reduce development costs with reductions in permitting fees and timelines
2. Reviewing each neighborhood for opportunities to provide incentives for developers to pursue redevelopment of specific parcels
3. A policy with real thresholds and requirements about how affordable development can actually be realized, such as height bonuses, tax abatements, and permit cost and timeline relief

While we understand the desire to put something forward quickly, the Home In Tacoma policy misses the mark. We need to take additional time to put together a real policy that truly addresses affordable housing in Tacoma instead of putting forward a hastily compiled policy that will do nothing to address our current problem while at the same time erode the quality and character of Tacoma.

In summary, Vice-Chair McInnis and Commissioner Edmonds have concerns that the policies (i) will not produce affordable housing, (ii) will encourage a different type of development that will change

neighborhood character (iii) will fail to address affordability, (iv) will reduce single-family housing supply, (v) and will cause building-scale conflicts in existing neighborhoods.

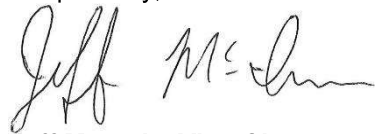
**Mapping Concerns** - All three commissioners are concerned with the map agreed upon by the Commission. These concerns include:

- **Low-Scale Residential Housing Opportunities appear Sufficient to Respond to Housing Needs:** The proposed policy changes would allow for additional housing types in addition to single-family houses in the Low-Scale classification (e.g., duplexes, triplex, & cottage housing) – this increases our housing capacity/options in existing neighborhoods with less reliance on expanding the Mid-Scale Residential designation.
- **The Mid-Scale Residential expansions are not focused near designated Corridors/Centers** – we believe that future Mid-Scale Residential should be introduced at strategic locations as part of neighborhood planning activities over the next five years. Neighborhood-level refinements would allow for additional community engagement, target housing on underutilized properties, and focus new mid-scale residential near parks, schools, colleges, commercial nodes, and similar existing housing types.
- **Apartments are Introduced in Isolated Locations:** The proposed map introduces Mid-Scale Residential at seemingly isolated locations across the city which are outside established nodes, transit corridors and neighborhood centers and/or near clusters of existing apartment/townhouse development (e.g., N. 15<sup>th</sup>, Norpoint Way NE, 49<sup>th</sup> Avenue NE, E. Roosevelt).
- **The Plan Creates Low-Scale Islands:** The proposed map amendments will create small islands of Low-Scale Residential that would be otherwise surrounded with Mid-Scale Residential (e.g., N. 24<sup>th</sup> & Warner Street, N. 11<sup>th</sup> & Alder, N. 9<sup>th</sup> & Union, S. 11<sup>th</sup> & Pine, S. 80<sup>th</sup> & Yakima).
- **The Plan Creates Disproportionate Expansions in Certain Neighborhoods:** Due to irregular block configurations, the proposed map amendments would disproportionately expand Mid-Scale Residential into existing neighborhoods (e.g., south of the 6<sup>th</sup> Ave. Center, NW edge of Hilltop, E. 56<sup>th</sup> & McDacer).
- **The Plan Fails to Recognize Existing Apartment Clusters:** The proposed Mid-Scale Residential designations are not applied to existing apartment/townhouse communities near Corridors/Centers, which perpetuates nonconforming situations and limits expansions (e.g., west/east sides of U. of Puget Sound, N 6<sup>th</sup> & K, N. Grant & Division, S. 9<sup>th</sup> & Sheridan).

We believe the project's expedited timeline prevented the Planning Commission from fully discussing all issues attending this important issue and from arriving at a project that will respond to the needs of the majority of the residents of Tacoma.

We hope this provides clarity on why we were unable to reach full consensus. Like our fellow commissioners, we acknowledge that Tacoma is facing an unprecedented housing crisis and our land use/regulatory framework should allow for more diverse housing options while recognizing existing neighborhood character.

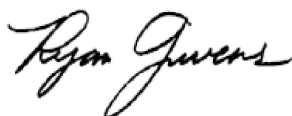
Respectfully,



**Jeff McInnis, Vice-Chair**  
Tacoma Planning Commission



**Carolyn Edmonds, Council District 2**  
Tacoma Planning Commission



**Ryan Givens, Architecture, Historic Preservation, and/or Urban Design**  
Tacoma Planning Commission