



August 5, 2022

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Attn: Stephen Atkinson, Principal Planner, Long Range Planning Division
City of Tacoma, Planning and Development Services
747 Market Street, Room 349
Tacoma, WA 98402
Submitted electronically to: satkinson@cityoftacoma.org

Re: Tideflats Subarea Plan Environmental Impact Statement (EIS) Scope

Dear Mr. Atkinson,

Thank you for providing the opportunity to review and comment on the Tideflats Subarea Plan (Plan) EIS Scope.

Communities for a Healthy Bay (CHB) is a 31-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

CHB staff has spent countless hours reviewing and analyzing regulations in the Tideflats for the past five years, and currently serve on the Technical Advisory Committee for the Tideflats Subarea Plan. We know that a robust EIS that relies on current science is necessary for the development of a Plan that will set the playing field for a truly vibrant, equitable, and thriving Tideflats. Below are our comments on the scope of this EIS.

Guiding Principles

The Guiding Principles of the Plan are the basic framework from which all priorities, incentives, and policies will cascade. It is crucial that these Principles are representative of the needs of our community from the start to ensure that this Plan works for everyone.

Environment and Health

We acknowledge that there are already a few Principles that touch on Public Health and Safety, but we do not see how these principles are addressed in the Characteristics for study nor the Alternatives. The following questions need to be studied, for each alternative, in the EIS to ensure these Principles are adequately addressed.

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What are the air pollution impacts for people residing in proposed live-work housing, adjacent residential areas, and inland detention facilities under each alternative? Communities that live adjacent to the Tideflats and the South Tacoma Industrial Area largely rank 10 out of 10 on the Washington Department of Health's health disparities scale – meaning these communities experience worsened health outcomes, including shorter life expectancy and higher rates of chronic disease, because of where they live.¹ Fossil fuel facility operations have known air quality impacts that detrimentally impact public health. The extraction, processing, and combustion of fossil fuels releases dangerous pollutants into the air, including particulate matter equal to or less than 2.5 microns in width (PM_{2.5}), nitrogen oxide, and carcinogenic volatile organic compounds (VOCs). Pierce County residents, especially those of color, experience higher rates of heart disease than the state average, which is worsened by exposure to PM_{2.5}. Asthma and chronic obstructive pulmonary disease are also exacerbated by exposure to PM_{2.5}, while VOCs disproportionately impact pregnant women, infants, and children as exposure leads to higher rates of infant mortality and low birth weights.^{2,3} The EIS should analyze the impact on these public health metrics, as well as other determinants of health including exposure to noise and light pollution, under each alternative.

What impact will the industrial development under each alternative have on the viability of nearby communities? We are especially concerned about affordable housing developments that may not be able to receive the funding they need to expand from the Department of Housing and Urban Development (HUD) if more and more hazardous substances (like oil and gas) are stored and transported here in the City center. Please review HUD's hazardous substance list, as well as their calculator for determining Acceptable Separation Distance from a hazardous site. The EIS should analyze the impact different industrial siting scenarios will have on these housing developments.

What are the likelihoods and impacts of an industrial disaster including but not limited to a spill, explosion, fire, or a noxious gaseous release under each Alternative? With each additional vessel, railcar, or pipeline bringing hazardous oil and gas through Tacoma comes an additional risk for a train derailment, oil spill, fire, and/or explosion. The EIS should analyze the industrial disaster risk under each alternative, and what the public safety impact would be.

What are the likelihoods and impacts of a natural disaster/phenomenon including but not limited to an earthquake, liquefaction event, lahar, landslide (submarine and terrestrial), and/or sea level rise under each Alternative? The Tideflats is an extremely geologically active landscape. Depending on the location of the epicenter and the depth and magnitude of an earthquake, for example, significant underwater slumps or landslides could occur.⁴ This process has occurred throughout the 15,000 years since the last glaciation of Puget Sound, as evidenced by the 100's-1000's of feet of post-glacial sediment fill on the floor of Puget Sound, at least in part derived from these processes.^{5,6} Liquefaction has also affected the water-saturated Tideflats area during past earthquakes creating another possible mechanism for the transfer of toxic-rich sediment and groundwater to mobilize rapidly, and for possible destruction of industrial infrastructure and threat to public health and human safety.⁴ Lastly, Mount Rainier is considered to be one of the most dangerous volcanoes in the United States due to lahars that are generated on its slopes that can (and have several times in the past) reached Commencement Bay.

What is the impact of tree canopy and heat islands within the Tideflats under each Alternative, and how could they be mitigated? The Tideflats has less than five percent tree canopy.⁷ Nearly 10,000 people work in the Tideflats during heat waves and without access to shade. We need to understand the frequency of heat

exhaustion, heat stroke, and other heat-related illnesses within the Tideflats, and how increasing the tree canopy could mitigate this frequency.

Land Use and Economic Development

Decarbonization, job growth, and being a leader in the green economy are intrinsically related. ***The EIS must evaluate how the different decarbonization goals under each Alternative will impact job growth, job density, and our ability to be a leader in the green economy.*** More explicitly, if we are to meet our decarbonization goals, we must transition towards more sustainable, less carbon intensive industries.

The reality is that our national and global economies will be transitioning towards energy source alternatives to fossil fuels, and will be actively decarbonizing our existing infrastructure. With this transition will come the need to create jobs in the sectors of electrification, pipefitting, construction, and alternative energies, to name a few. ***This job creation will have a huge economic benefit for our communities, and needs to be thoroughly understood through the lens of this EIS.*** Conversely, if we continue to rely on industries that will be phased out in the coming decades, we will see a decline in the vitality of our communities, especially those individuals that work in the Tideflats. ***Without a planned, equitable transition for these workers, what will be the impact on their livelihoods through the lens of Social Determinants of Health?***

Alternatives

Alternative 3 should be modified to implement a zoning strategy in the Northeast Tacoma Transition Area to one that is similar to the zoning proposed for the Foss Peninsula Transition Area. Residential communities along and upland of Marine View Drive have been in longstanding conflict with Port industries due to noise, odor, traffic issues associated with common Port activities, and exposure to port-related industries and the related health impacts mentioned above. Beyond the obvious public safety impacts these residents face, any further development in this area would only further exacerbate the strife between Northeast Tacoma residents and industry, and will result in increasing noise, odor, and traffic complaints to the City. Further, this steep, forested bluff is a significant biodiversity corridor for federally protected species, and is also a geologic hazard area subject to slumps and landslides due to both natural and human-induced oversteepening. Adding new development of any kind to this area jeopardizes public safety and environmental health.

Existing Policies

In the Fall of 2021, the City of Tacoma adopted the Tideflats Non-Interim Regulations (Regulations). While these regulations advance some of the Guiding Principles of the Plan, there are weaknesses in the existing policy that need to be evaluated.

What are the environmental and public health impacts of the current allowance for 'Cleaner Fuels' in the Tideflats? The 'Cleaner Fuels' definition in the Regulations includes *Alternative Fuels*, which under RCW 19.112 (2) includes "liquefied petroleum gas, liquefied natural gas, compressed natural gas, biodiesel fuel, E85 motor fuel... hydrogen fuel... nonhazardous motor fuel, or electricity...." We know that natural gas cannot be a part of our decarbonization strategy in Tacoma. Further, this definition does not define what kind of hydrogen nor what kind of electricity – this leaves room for these types of fuels to be produced from a fossil gas base.

What are the environmental and public health impacts of the 15% cumulative expansion of fossil fuels allowed for existing facilities that are seeking approval for Cleaner Fuels Infrastructure? We know that to reach our decarbonization goals, and to have any chance of avoiding the worst consequences of the climate emergency,

we should actually be decommissioning fossil fuel infrastructure and capturing carbon and other greenhouse gases (GHGs) from our atmosphere.

What are the environmental and public health impacts of the Puget Sound Energy (PSE) Liquefied Natural Gas (LNG) facility building out to its full refining capacity? The regulations allow for the PSE LNG to expand to the full capacity reviewed in its 2014 EIS. We know that allowing PSE LNG to reach their full refining capacity will result in an additional one million tons of GHGs every year for the life of the project, but the full impact of this scenario has not been adequately studied.

Existing Conditions

What is the extent of contamination and likelihood of exposure from existing- and future identification of new- Model Toxics Control Act and Resource Conservation and Remedial Action sites? It is very likely that new contaminated sites will be identified throughout the Tidelands during the life of the Subarea Plan. The EIS needs to identify all contaminated sites, which regulatory entity have authority over them, and how their cleanup will be addressed under each alternative.

Scope of the EIS

Lastly, it should be made very clear what is not covered in the scope of this EIS. The programmatic EIS for the Plan will streamline permitting for some projects, *but not all*. ***Should a proposed project present significant, unavoidable environmental and public health impacts, those impacts must be evaluated through the lens of a unique, project-based EIS.*** There is no way of knowing today what the specifications of a new project will be nor what the state of technology will be for the life of this Subarea Plan.

Thank you for providing the opportunity to review and comment on the Tidelands Subarea Plan EIS Scope. If you have questions or need clarification of any of our comments, please contact Erin Dilworth at edilworth@healthybay.org.

Sincerely,



Erin Dilworth
Communities for a Healthy Bay
Deputy Director

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4. Pacific Earthquake Engineering Research Center (2001). *Some Observations of Geotechnical Aspects of the February 28, 2001, Nisqually Earthquake in Olympia, South Seattle, and Tacoma, Washington Strong Ground Motions and Site Effects*. Accessed on August 2, 2022 from <https://apps.peer.berkeley.edu/publications/nisqually/geotech/groundmotions/index.html>
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