

City of Tacoma 2024 S4F.3. Adaptive Management Response (AMR) Update

Q.102a. Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period? (S4.F.3.d)

Update action taken and status of Phase I Municipal Stormwater Permit WAR 044003 S4.F Report for Turbidity Incident on East 3rd Street and East D Street, (originally reported January 11, 2021, as ERTS #703080).

Background

- On May 15, 2023, the City of Tacoma (City) submitted an S4.F.3 Adaptive Management Response Report (AMR) to the Department of Ecology (Ecology) for Turbidity Incident on East 3rd Street and East D Street, (originally reported January 11, 2021, as ERTS #703080).
- On July 5th, 2023, a separate memorandum of supplemental information was provided by City staff to Ecology. The City of Tacoma reviewed the Best Management Practices (BMP) options provided by the June 26, 2023, Parametrix Technical Memorandum. This memorandum described the City's consideration of all BMPs suggested by Parametrix. This supplemental information included a modified list of options and alternatives for BMPs the City could implement based on City observations and knowledge of the site over an extended period and varying weather conditions.
- On August 16th, 2023, City staff received a letter requesting S4.F.3.b a Revised Adaptive Management Response Report (RAMR) be resubmitted to Ecology outlining additional Best Management Practices (BMPs) and an implementation schedule as needed to meet AKART. The RAMR was submitted to Ecology on September 18, 2023.
- **Table 1.** provides a summary of the actions requested by Ecology based on the AMR, the Parametrix Memorandum, RAMR and December 5th, 2023 letter to be carried out by City staff, along with the City's response to and status updates for the requested actions.
- **Table 2.** provides a summary of actions and follow-up occurring in 2024.

Table 1. "City of Tacoma Shall Take the Following Actions"

Action Requested by Ecology	City Response	Status
Continue implementing the City's May 2023 Adaptive Management Response Plan/Report for now.	The city continues to implement action items from the May 2023 AMR.	Ongoing.
Revise and resubmit the City's Adaptive Management Response Report to Ecology within 45 days of receiving this inspection report.		Submitted September 18, 2023.
Continue to require private party sweeping for managing track-out to East 3rd Street.	This expectation has been communicated to property owners and tenants. Monthly area inspections performed by EC staff.	Ongoing.
Confirm that Cascade Capital completes actions described in City of Tacoma's letter from July 12, 2023, Subject: Private Stormwater System Inspection at 302 East F Street on May 18, 2023.	City ECS continue communication regarding the requested actions listed in the July 12 inspection letter.	Ongoing.
Complete an investigation of infiltration potential behind the jersey barriers at the corner of East 3rd and East F Streets before October 1, 2023.	City staff will be able to evaluate infiltration potential of the corner at 3 rd and F Streets after installation of a bioretention ditch along East F Street.	Completed in September 2023. Bioswale install has been completed with underdrain that connects to the City's stormwater main on E. 3 rd Street. Completed on Nov. 1, 2023.
If feasible, implement Parametrix's proposed measure, or equivalent, to remove fill placed in the railroad area and reassess and enhance infiltration at the East 3rd and East F Streets corner. This option would provide infiltration and storage behind the jersey barrier.	Parametrix's proposed measures are included as part of the bioretention ditch installation along East F Street and repaving of the roadway to follow.	Completed in September 2023. Paving to be completed directly after ditch installation as weather permits. Bioretention ditch has been completed. East F Street has been repaved along 400 linear feet adjacent to Cascade Capital property. Completed on Nov. 16, 2023.
Have Cascade Capital implement an ESC BMP(s) on exposed soil areas on Cascade's property between the fence and lumber storage along East F Street.	EC has reached out via phone communication, to Cascade Capital requesting follow-up on the progress of these action items.	Ground cover completed February 12, 2024.

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Consider discussing a J-hooked silt fence install with Cascade Capital.	EC witnessed the installation of the silt fence on Cascade Capitals property along East F Street. The silt fence was installed correctly and to SWMM 2021 standards. Installation of J hooks would require removal and reinstallation of the silt fence. It is the City's opinion that installation of J hooks would not be beneficial at this time and could be cost prohibitive to the property owner.	No Action.
Work with Jackson Energy to re-establish and restore the quarry spalls in their driveway entrance, or equivalent BMP, at 302 East F Street.	EC sent an Inspection Letter to Jackson Energy on August 23, 2023, requesting this action to be completed within 30 days of notification. EC will continue communication with property representatives to ensure this action is completed. Progressive enforcement will be administered by EC if the property owner does not comply.	On December 15, 2023, Jackson Energy replaced quarry spalls at the entrance and installed an infiltration trench that spans the length of new quarry spall driveway entrance along the fence line. The infiltration trench was experimental and to date has provided a level of infiltration to reduce standing water.
Develop a plan to address turbidity sources from parking areas in the public right-of-way.	EC performs monthly area inspections and continues to communicate with property owners and tenants to maintain parking areas in the right-of-way and reduce potential sources of turbidity.	Ongoing. To date, this area has not been a source of track out or turbid runoff. City staff will continue to monitor.
The catch basin on the 303 East D Street property requires repair. Schedule and complete this repair in accordance with your Permit. See photo 22.	City Field Services Support Staff will complete this repair by September 2023.	Repair was completed September 29, 2023.
Identify funding sources for Streets Initiative #28 and take steps to construct this project in 2024.	City ES staff are utilizing an existing contract with already allocated monies to install the bioretention ditch. With a reduced scope, existing City Street Initiative Funding will be able to cover the cost of repaving along F Street between 3 rd and F Streets.	Bioretention ditch was completed in September 2023. East F Street has been repaved along 400 linear feet adjacent to Cascade Capital property.

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Action Requested by Ecology	City Response	Status
EC staff will continue to perform inspections of the area, document BMP installation, and measure progress.	City staff continue to do periodic inspections to assess BMP effectiveness.	Ongoing
Capital Lumber will reach out to Aspect Consulting for consultation on additional BMPs to address the turbid discharge.	Capital Lumber has been working with Green Tech Excavation.	Ongoing
A post-inspection letter documenting these actions will be sent to site management with Cc to the Capital Lumber Company office, the property owner, and to Ecology.	City staff issued an NOV letter on March 25, 2024 and will continue to do so, with the potential for civil penalty until the turbid runoff is corrected.	Ongoing

Table 2. Timeline of actions, enforcements and outcomes occurring in 2024		
Date	Action	Completed by
February 26, 2024	City staff received an email from Ecology requesting an update on the City's actions to eliminate the reoccurring turbid discharges from Capital Lumber's lot.	City staff and Ecology staff
February 28, 2024	Rain event caused discharge of turbid runoff from Capital Lumber site to the MS4 and Thea Foss Waterway. ERTS#729190 reported to Ecology by City.	City Staff
March 7, 2024	City staff provided progress report in response to Ecology's email on February 26 with an email listing the actions completed by the City and Capital Lumber since the last turbid discharge, as documented in Table 1.	City Staff and Capital Lumber
March 25, 2024	City issued NOV letter to Capital Lumber for turbid discharge on February 28, 2024.	City Staff
June 7, 2024	City forwarded to Ecology the letter from GreenTech Excavation Co. with a list of actions they had performed for Capital Lumber to address the turbid discharge from their property on February 28. Actions included: installing straw wattles in front of silt fence, placing crushed rock at low point and along edges to reduce erosion, installing gravel filter drain along 'F' Street side of property, reorganizing site to reduce traffic along fence line, and monitoring site runoff.	Capital Lumber
August 29, 2024	Notice to Ecology that the repair of the erosion in the swale on 'F' Street had been completed and re-hydroseeding of the swale was scheduled in the next few weeks.	City Staff
November 14, 2024	Rain event caused discharge of turbid runoff from Jacksons Energy site onto the neighboring Center for Urban Waters parking lot and into the MS4 and Thea Foss Waterway. ERTS#735047 reported to Ecology by City.	City Staff
November 20, 2024	City issued warning letter to Jackson Energy regarding the turbid runoff.	City Staff
December 6, 2024	City installed CB socks and jute mat along fence line of CUW parking lot to help protect the on-site storm system.	City Staff
February 7, 2025	Update to Ecology that the swale on 'F' Street is fully vegetated with no apparent erosion over the winter. Capital Lumber erosion control measures are effectively reducing turbid discharges from their site. Jackson Energy had regraded their property to help prevent turbid runoff from leaving their site.	City, Capital Lumber, Jackson Energy
February 18, 2025	City inspected Jackson Energy site after recent rainfall and verified measures were successfully preventing turbid runoff from leaving the site.	City staff