



City of Tacoma  
Planning and Development Services

April 6, 2020

Jennifer Stebbings  
Port of Tacoma  
P.O. Box 1837  
Tacoma, WA 98401

RE: Shoreline Substantial Development Permit Exemption  
File No. LU20-0052, Facilities Maintenance, Multiple Sites

Dear Ms. Stebbings:

You have requested an exemption from a Shoreline Substantial Development Permit to allow the repair and maintenance of legally established Port facilities at multiple sites located in the Port of Tacoma, within the "S-10" Port Industrial and "S-13" Waters of the State Shoreline Districts. The maintenance activities received prior approval under a previously issued exemption which has expired (SHR2014-400000237530) and include the following:

- Hanging and bolt-on fender systems and rub strip repair
- Bull rail repairs/maintenance/replacement
- Bollard installation/relocation (includes mooring hardware)
- Utility maintenance (excluding stormwater), including the repair and replacement of electric, domestic water, fire water, communications and warning systems
- Power/Switch gear maintenance, including upgrades and increasing capacity allowed per code
- Crane rail repairs
- Deck repairs including re-planking of dock surfaces (wood)
- Re-surfacing existing impervious areas (paved areas and gravel areas)
- Exterior building repairs and maintenance, including windows, doors, siding, landscaping, roofing, and associated equipment (e.g., HVAC, etc.).
- Containment berm installation and maintenance
- Light pole maintenance
- Safety equipment maintenance, including safety ladders, life rings, and floatation devices and navigation lights
- Safety platform maintenance
- Cathodic protection system repair/maintenance

The majority of the work is anticipated to take place on or from the surface of existing piers and wharves, which are above or adjacent to the waterway and within the floodplain. Work on existing buildings and paved areas will be landward of the OHWM. Exceptions to this include replacement of navigation lights, done from boats, and in-water work such as the installation of cathodic protection systems.

For each maintenance project, best management practices (BMPs) will be used to ensure no deleterious material enters the waters of the state, and will comply with water quality standards and habitat protection standards per the State of Washington. Port of Tacoma employees and/or its contractors will prepare spill prevention plans. Further, following work, each site will be returned to its current state.

Attachment "A" shows the locations of the proposed work.

An exemption from the Substantial Development Permit requirements does not constitute an exemption from the policies and use regulations of the Shoreline Management Act, the provisions of this Master Program, and other applicable City, state, or federal permit requirements. The proposed repairs are consistent with the policies of the Tacoma Shoreline Master Program (TSMP) and the maintenance exemption in TSMP 2.3.3, as they are intended to prevent the cessation of lawfully-established uses.

The sites are located in or adjacent to marine waters and shorelines that are regulated critical areas. The sites have been reviewed in consideration of the critical area policies and regulations of the TSMP and provided the maintenance work adheres to the many BMPs provided, the activities are unlikely to cause substantial adverse impacts to the shoreline environment.

Pursuant to WAC 197-11-800, subsection (3) and the City of Tacoma's SEPA Procedures, this proposed action is categorically exempt from the Threshold Determination and Environmental Impact Statement requirements of SEPA.

Based on the above findings, the requested exemption to the City's Shoreline Substantial Development Permit requirement is consistent with the policies of the SMA, the policies and implementing regulations of the TSMP and with the criteria set forth in the WAC and RCW for the authorization of such exemptions.

The following are conditional **requirements**:

**Conditions**

1. The applicant shall apply for and receive approval of any required building permit from the City of Tacoma prior to any work.
2. The applicant shall follow all proposed installation and construction methods and best management practices for minimizing unintended impacts during repair and maintenance of all structures.
3. All trash and unauthorized fill, including concrete blocks or pieces, bricks, asphalt, metal, treated wood, glass, floating debris, and paper, below the OHWM in and around the applicant's repair project areas shall be removed and deposited at an approved upland disposal site.
4. No stockpiling or staging of materials will occur below the OHWM of any water body.
5. All shoreline work shall be completed within the approved work windows designated by the Washington State Department of Fish and Wildlife (WDFW).
6. The applicant shall notify the City of Tacoma and pertinent state and federal agencies should an unexpected spill of fuel or other chemicals occur in Commencement Bay or associated waterways.
7. The City of Tacoma is not the only agency with jurisdiction over the project area. The applicant is responsible for coordinating any required reviews and/or approvals with the

WDFW, Washington State Department of Ecology, and U. S. Army Corps of Engineers and shall provide documentation to the City of Tacoma.

8. This exemption shall be valid for a period not to exceed 5 years from the date of issuance. Should the Shoreline Master Program be revised prior to the completion of this project, additional review may be required.

In addition, the applicant is advised of the following:

- This permit is only applicable to the proposed project as described above and based upon the information submitted by the applicant. Modifications to this proposal and future activities or development within the regulated buffers may be subject to further review and additional permits as required in accordance with the *Tacoma Municipal Code*.
- The applicant must obtain other approvals prior to construction as required by other local, state and federal agencies. The City of Tacoma is not the only reviewing agency with jurisdiction over the project area. The Army Corps of Engineers and State Department of Fish and Wildlife have requirements regarding work within regulated waters that may be applicable to the project.
- This exemption is applicable only to areas within 200 feet of the OHWM of waters of the state. It is not meant to constitute an exemption from *TMC13.11 Critical Areas*. Should work outside the Shoreline jurisdiction occur within vicinity of a non-associated critical area, additional review may be required.

We are issuing this letter of exemption per the provisions of *TMC* Section 13.10 to comply with the requirements of *WAC 173-27-050* and *WAC 173-27-040*. Should you have any further questions or requests please do not hesitate to contact me at 253-591-5121.

Sincerely,



Shannon Brenner  
Environmental Specialist

cc via regular and electronic mail:

Washington Department of Ecology, Shorelands & Environmental Assistance Program, Zach Meyer, SWRO, P.O. Box 47775, Olympia, WA 98504-7775 (zmeye461@ecy.wa.gov)  
Washington Department of Fish and Wildlife, Elizabeth Bockstiegel, 600 Capitol Way N., Olympia, WA 98501-1091(elizabeth.bockstiegel@dfw.wa.gov)  
U.S. Army Corps of Engineers, Attn: Regulatory Branch, CENWS-OD-RG Attn: Halie Endicott, P.O. Box C-3755, Seattle, WA 98124 (halie.endicott@usace.army.mil)  
U.S. Fish & Wildlife Service, Attn: Judy Lantor, 510 Desmond Drive SE #102, Lacey, WA 98503 (judy\_lantor@fws.gov)



**FIGURE 1 - Vicinity Map**

REFERENCE: NWS-2014-1149-WRD

PROJECT: Port-wide Maintenance

APPLICANT: Port of Tacoma

LOCATION: Tacoma, WA

IN: Commencement Bay

NEAR: Tacoma

COUNTY: Pierce

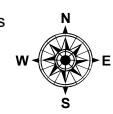
STATE: Washington

**ADJACENT LANDOWNERS:**

1. Puyallup Tribe of Indians
2. City of Tacoma
3. WSDOT
4. Private Landowners

SHEET: 1 OF 6  
DATE: 2/11/2020  
AUTHOR: Jenn Stebbings

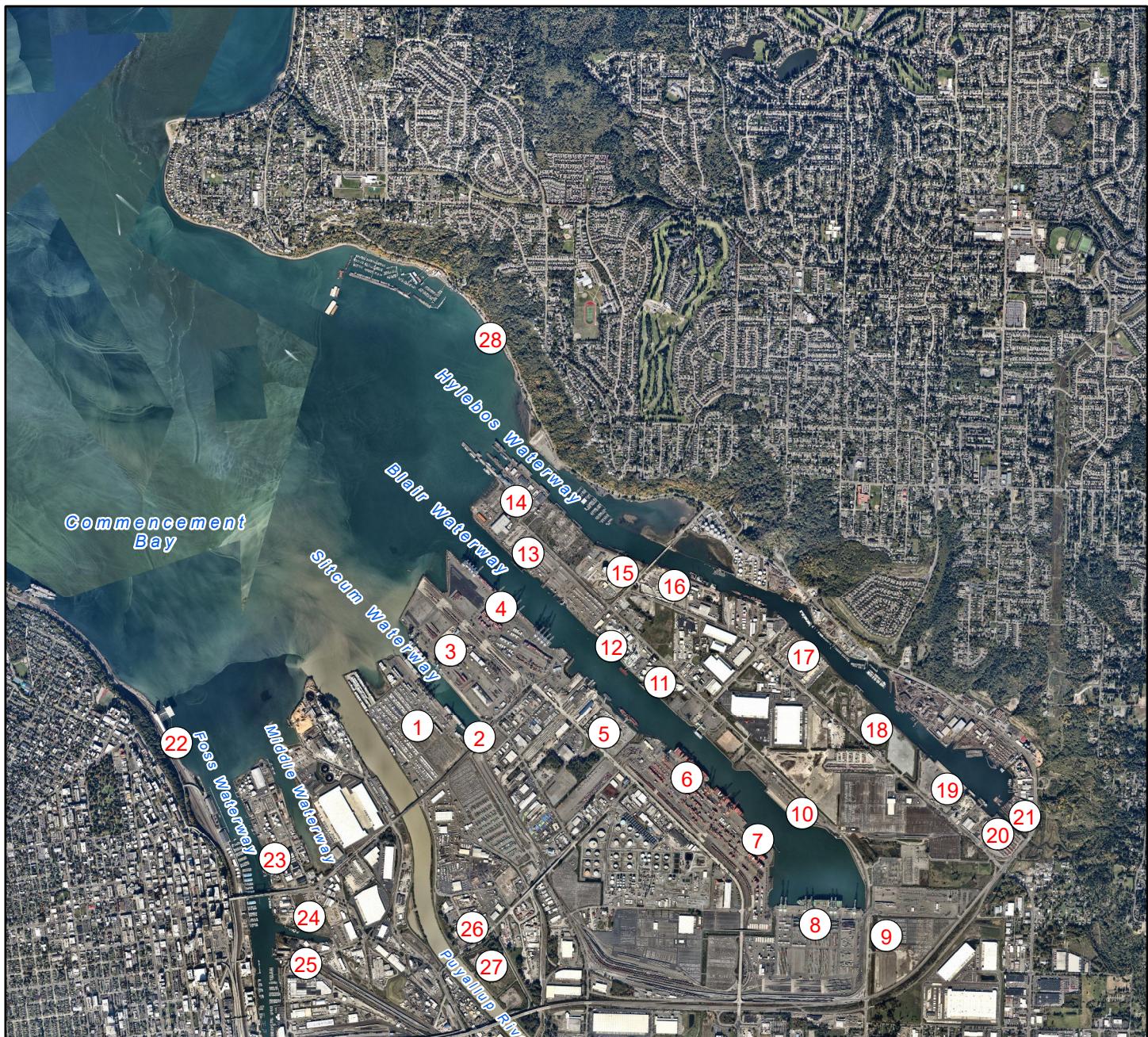
0 0.25 0.5 1 Miles



**Port of  
Tacoma**  
PO Box 1837 Tacoma, WA 98401 (253) 383-5841



**Attachment "A"**



1 WEST SITCUM TERMINAL	8 PCT	15 PSE	22 TEMCO
2 PORT ADMIN BLDG	9 PARCEL 15	16 STEAMPLANT	23 YOUTH MARINE
3 TERMINAL 7 A-D	10 EB-1	17 CARLILE	24 WATTLES
4 HUSKY TERMINAL	11 GP GYPSUM	18 PARCEL 99	25 PARCEL 92
5 PARCEL 125	12 PARCEL 115	19 PARCEL 105	26 2002 STEWART
6 WUT	13 TOTE	20 PARCEL 86	27 GOG-LE-HI-TE
7 BLAIR DOCK	14 TRIDENT/EBC	21 CALBAG	28 D.G. KAYAK LAUNCH

**FIGURE 02**

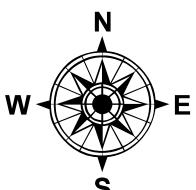


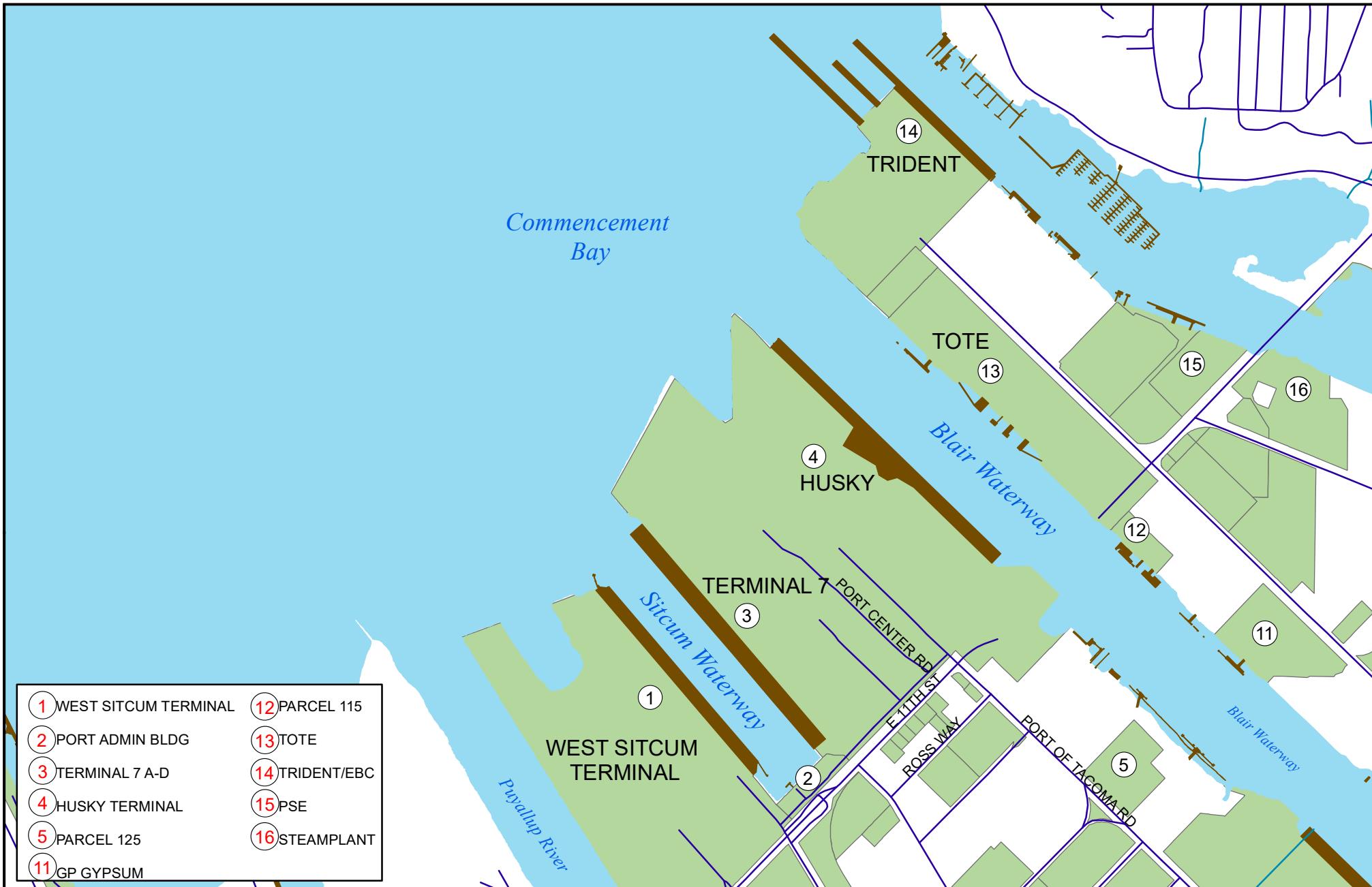
REFERENCE #: NWS-2014-1149-WRD  
 APPLICANT NAME: Port of Tacoma  
 PROJECT: Programmatic Port-wide Maintenance  
 LOCATION: Tacoma, WA

SHEET 2 of 6

DATE: 02/11/2020

0 0.5 1 1.5 2 Miles





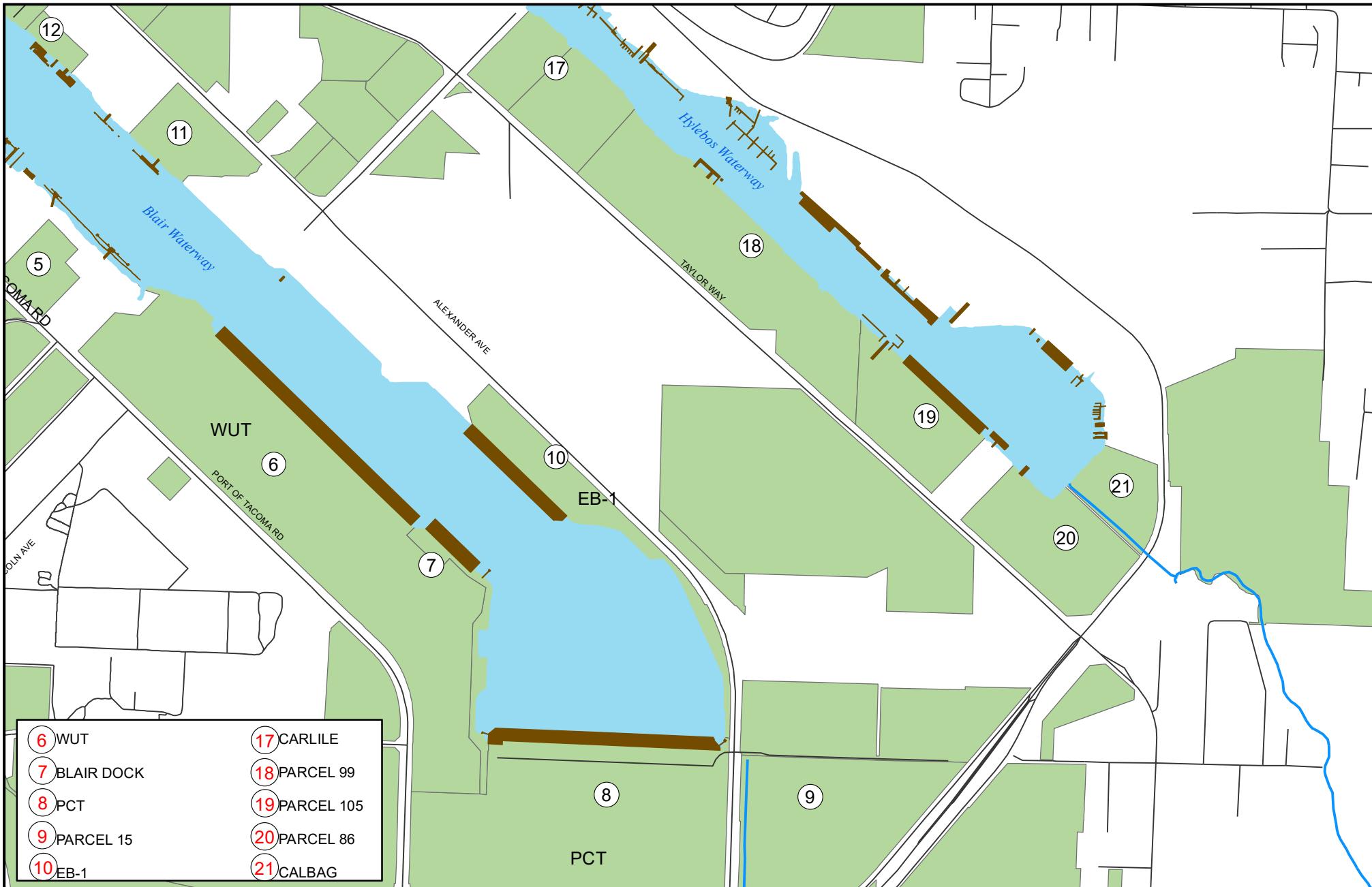
**FIGURE 03**

REFERENCE #: NWS-2014-1149-WRD

APPLICANT NAME: Port of Tacoma

PROJECT: Programmatic Port-wide Maintenance

LOCATION: Tacoma, WA



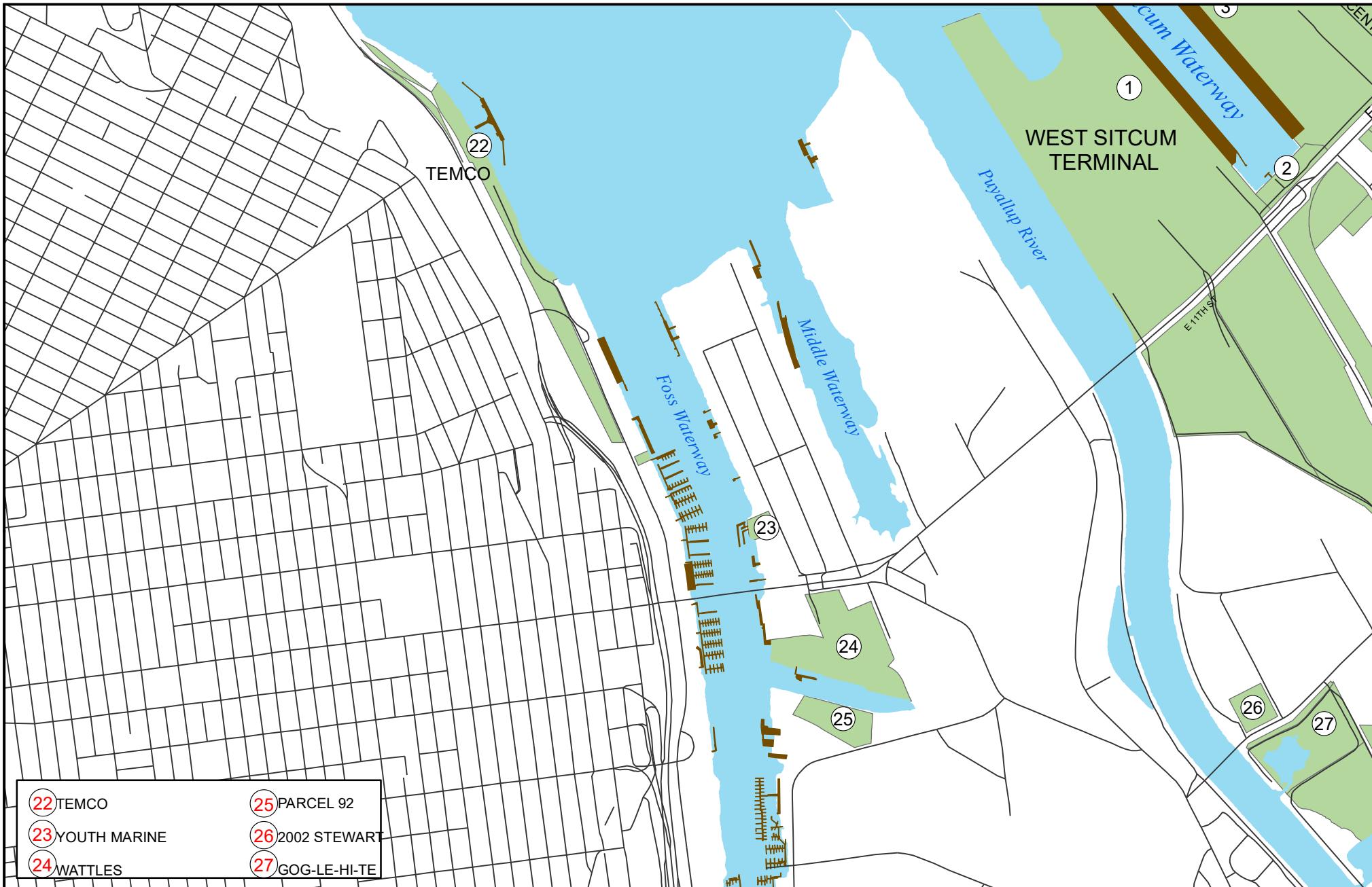


FIGURE 05

REFERENCE #: NWS-2014-1149-WRD

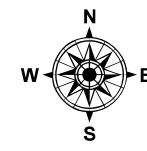
APPLICANT NAME: Port of Tacoma

PROJECT: Programmatic Port-wide Maintenance

LOCATION: Tacoma, WA

SHEET 5 of 6

DATE: 2/11/2020



0 500 1,000  
Feet

- Creek
- Roads
- Piers
- Waterways
- PortParcels

**DISCLAIMER:** The information included on this map has been compiled by Port of Tacoma staff from a variety of sources and is subject to change without notice. These data are intended for informational purposes and should not be considered authoritative for engineering, navigational, legal and other site-specific uses. The Port of Tacoma makes no representations or warranties, express or implied, as to accuracy, completeness, timeliness, or rights to the use of such information.

Author: Jenn Stebbings



**FIGURE 06**

**REFERENCE #:** NWS-2014-1149-WRD

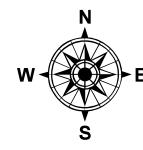
**APPLICANT NAME:** Port of Tacoma

**PROJECT:** Programmatic Port-wide Maintenance

**LOCATION:** Tacoma, WA

**SHEET 6 of 6**

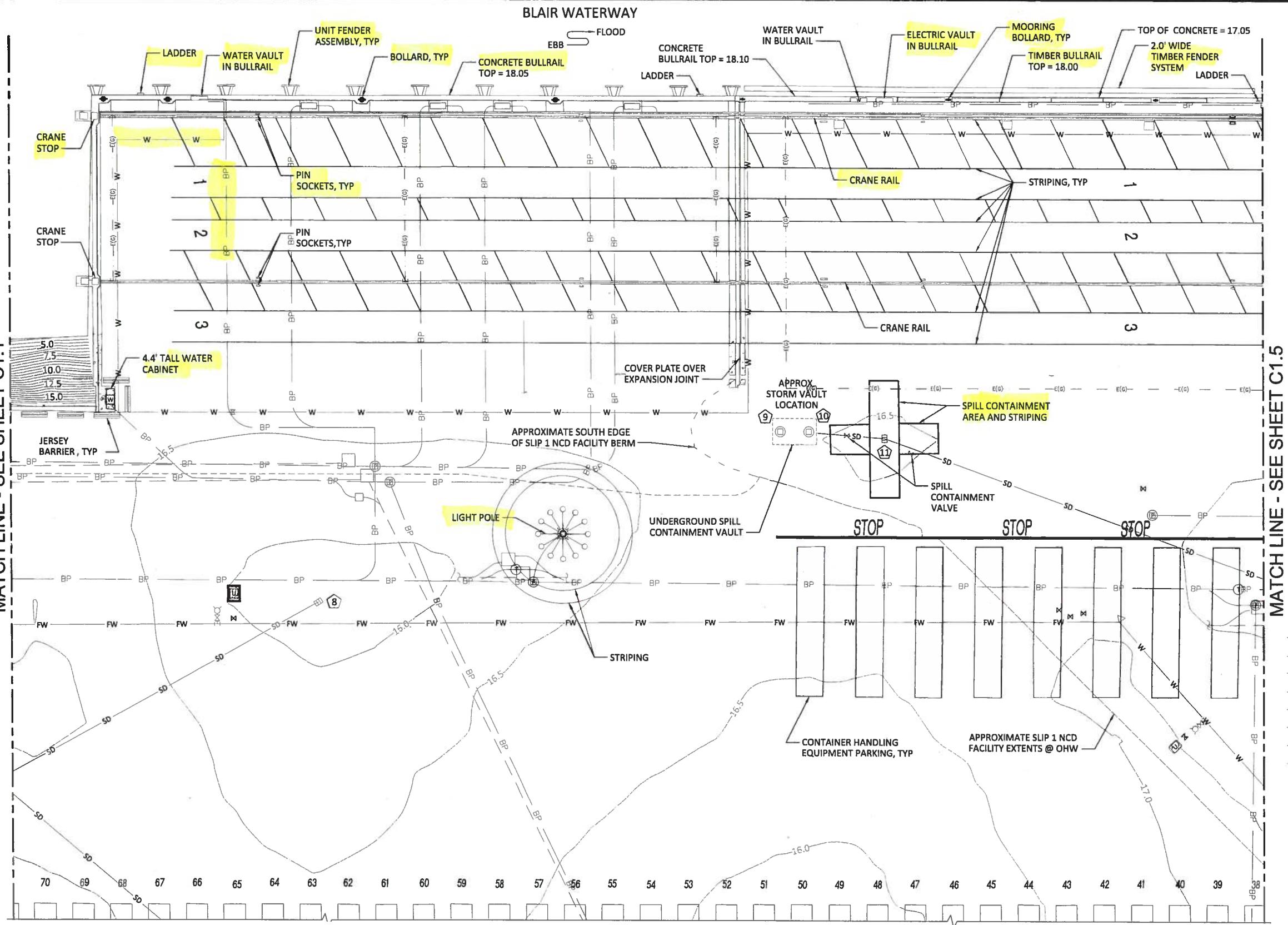
**DATE:** 2/11/2020



0 500 1,000  
Feet

Port of Tacoma  
PO Box 1837 Tacoma, WA 98401 (253) 383-5841

MATCH LINE - SEE SHEET C1.1



**Terminal and Shoreline Area Maintenance and Repair.** Highlighted items are examples of what activities are included in the permit application.

1 PLAN - EXISTING CONDITIONS  
SCALE: 1" = 20'

## KEY PLAN:

