

October 26, 2009

Protecting Puget Creek

The Puget Creek Restoration Society (PCRS) protects, enhances and restores the Puget Creek Watershed and similar streams, wetlands and green spaces. We serve the South Puget Sound communities and invite their participation through hands-on restoration, research, education, advocacy, and by promoting a sense of stewardship.

Our organization represents over 3,000 members and volunteers located in the City of Tacoma and who are deeply concerned with wetland, stream, green space and nearshore issues in the City.

Thank you for allowing us to provide input into this project. We request the following conditions be incorporated into the project and response to our questions be developed:

A major question is why wasn't an EIS conducted because of the salmon bearing stream, high quality wetlands, wildlife habitat, nearshore component that has ESA listed species utilizing?

Did the Garfield Gulch project include applying for an exemption? Because it went out for public comment and included both storm and sewer line repair. Why then is the Puget Gulch project requesting an exemption and at the Northend Neighborhood Council meeting on 12-7-09 that Mr. Smith skirted the issue of if a public meeting for comment was going to happen. Instead he said they would be happy to come back before the NENC to discuss mitigation plan etc.

Why then is the Puget Gulch project applying for an exemption when there is a lot more sensitive habitat here?

Where is funding coming from for the Puget Gulch project and are there stipulations addressing Environmental concerns from funding requirements?

Will there be a component, like DOT does, where contractors can bid on an alternate process to do the work—thus bidding to encompass concerns such as ours and alternate methods to do the project?

Since 5/8" gravel has been placed as a trail base to a depth of 4" and roughly 8' wide so people in wheelchairs, people biking and pushing baby stroller and others so they could have a comfortable and safe trail. Will that trail be repaired to such standards so people will be able to use it?

Trucks can enter the Gulch from the southerly end because most of the work will be in that area thus less impacts to the habitat and trail then if there was a continuous running up and down the entire Gulch. Environmental Services set precedent by conducting their Union Ave. work from Union Avenue and not driving up the trail. The videoing of the lines was done through a private company who held back the vegetation so as not to damage it and they filled in their truck tire ruts afterwards. So this work should use the same concerns.

What about a skid arrangement or temporary rails with winching system to allow the large loads down the trails?

Instead of filling in wetland areas so trucks etc. can be stationed there and thus taking

area from wetland functions because the fill material would be left. We recommend that landing mats be placed in those areas temporarily so when removed the wetland is still relatively intact. Thus there is no need to make a 15 foot wide road up the Gulch when the existing 7-8 foot path is sufficient for all other vehicles besides the semi that they want to take up the trail. So vegetation will need to be cut so a larger truck, if that is the option, can get up so why not lay landing mats alongside each side of the trail then those can be taken away when work is done. The wetland and other habitat can then rebound in order to provide functions for the stream and wetlands in the future. Otherwise a 15 foot wide road will drastically affect the area for ever.

For those project areas that are going to be dug up or areas where native vegetation will be destroyed (other than cut down and landing mats laid over those areas) we would like those areas flagged off. This would then allow us to go in and salvage native vegetation and then replant it after the project is completed. Or Public Works can go in and salvage the plants.

There will need to be a long-term invasive plant maintenance component done since the sewer people will not allow trees to be planted and they are going to cut down some of the existing canopy and shrubs. The reason is that the invasive Himalayan and Evergreen Blackberry will take over and once again, before we started working down there, it will be covered in invasive blackberry, ivy, morning glory and Japanese knotweed. As we understand they may only want to hydro seed the sewer line areas and thus we won't even have shrubs. We contend that trees, shrubs, groundcovers and herbaceous plants all need to reside for habitat purposes.

There are going to be proposed pump stations that are huge in order to pump the sewage around the lines that are being worked on. Why not have those stations outside the Gulch and intercept the sewage before it enters the lines going through the Gulch and then pump it around the Gulch to other sewer lines that then go past the work area. Also if these pumps are located in the Gulch then landing mats can be deployed instead of filling in sensitive habitat forever.

Vegetation can be tied back or held back in order not to damage anymore than necessary. If cutting is needed, in our minds it isn't, then it should be vertical cutting just wide enough for the vehicle to pass and not wide horizontal cutting just to have extra clearance.

Work should be done in the later fall so nesting birds etc. will not be impacted from the moving of brush and the work etc.

Smaller trucks need to be used because a big 18 wheel semi will destroy the area as far as a functioning ecosystem. The piping can be transported on smaller vehicles. All future work and current work should be using Gators and/or small pickups like older Toyotas, Datsuns and Couriers etc.

Replanting of any damaged or destroyed vegetation should be done because the Environmental Services has already set a precedence in the Puget Gulch by doing this in the sewer repair in the Union Avenue section of the Gulch. Also restoration of old path for habitat if new sections are made that follow over top of sewer lines etc.

Mitigation needs to be done to habitat damages with new sections of road if any.

Monitoring of the re-vegetation work should be done for 5-years or contracted to PCRS. Put back, replace if damaged any bench or split rail fencing and trail gravel that is there currently for public benefit.

In this day and age of turmoil (war and financial problems) people need a unique, comfortable and enjoyable place to visit and to get away from the noise of a City. In 1922, 1962, and 1986 there were major excavations and damage done to this area, must we continue to destroy what nature and the community has repaired. It is now the time to act and protect what little viable habitat is left in the City. By instituting, yes more labor intensive and costly processes, more environmental friendly approaches to the way we conduct our work it will leave a legacy for future generations that all of us can be proud of.

We urge the City Council to act to protect the habitat of Puget Gulch and support us in making sure that all measures to protect the wetlands, stream and upslope conditions will be done to the benefit of the ecosystem. We urge that our recommendations be instituted so the area isn't destroyed in this progression of the work that needs to be done.

As we understand from a meeting with City staff that we attended an Exemption has been applied for which would basically allow Environmental Services to not have to take special precautions to avoid impacts or having to repair damages.

We would like a public forum so the community can comment and Environmental Services can portray what work will take place and where in the Gulch digging etc. will happen.

Please remember that Puget Creek is a salmon bearing stream and the wetlands in this area are functioning extremely well so we need to protect them. Thank you.

I write as an officer of the Board of Directors of Puget Creek Restoration Society, which has evaluated the proposed project. We will appreciate your office's full consideration of our position, and we look forward to working with you in making Tacoma a better place for everyone.

Thank you for your consideration in this matter. You can reach us at (253) 779-8890 if you have any questions.

Sincerely,

Scott M. Hansen-B.S., M.A., M. S., (Ph.D.-student)
Ecologist/President Board of Directors