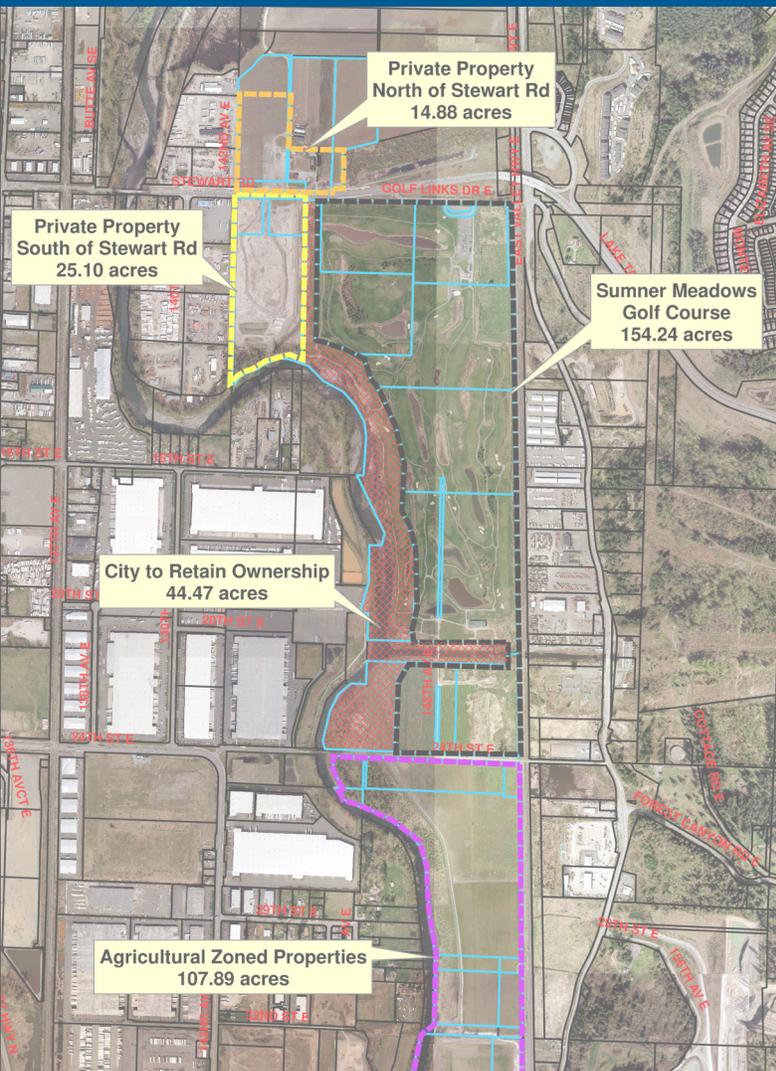


# DRAFT



## City of Sumner 2013 Comprehensive Plan Annual Amendments

### SUMNER MEADOWS DOCKET

### Draft Supplemental Environmental Impact Statement

May 2014

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**CITY OF SUMNER**  
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Community Development Department  
Paul Rogerson, AICP, Director

May 15, 2014

**Subject:** City of Sumner 2013 Comprehensive Plan Annual Amendments Summer Meadows Docket Draft Supplemental Environmental Impact Statement (Draft SEIS)

Dear Reader:

The City of Sumner has issued a Draft Supplemental Environmental Impact Statement (Draft SEIS) for the City of Sumner 2013 Comprehensive Plan Annual Amendments, addressing map and text docket applications that would amend the Sumner Comprehensive Plan and development regulations related to the surplus of the Summer Meadows Golf Course for private development. The study area is generally bounded by Stewart Road on the north, on the east by the BNSF railroad tracks, on the south by 24<sup>th</sup> Street East, and on the west by the White (Stuck) River.

The purpose of this Draft SEIS is to assist the public and City decision makers in considering future growth and land use patterns in the Summer Meadows Golf Course vicinity. Issues facing decision makers include potential future development on the Summer Meadows Golf Course property under extended light industrial zoning as well as whether to increase the City's total area under light industrial or high density residential uses on adjacent private properties. To assist with decision making, the City is addressing five alternatives in the Draft SEIS: Alternative 1—Summer Meadows Docket Application, Alternative 2—Areawide Industrial Alternative, Alternative 3—Areawide Industrial and Residential Alternative, Alternative 4—Offsite Alternative, and Alternative 5—No Action Alternative. For each alternative the Draft SEIS programmatically addresses: earth, air quality, flooding, plants/animals, land use, aesthetics, and socioeconomics, relationship to plans and policies, transportation, noise, public services, and utilities.

The SEIS for the 2013 annual amendments proposed for the Summer Meadows Golf Course supplements the Final EIS for the City of Sumner Comprehensive Plan Update and Amendments issued on November 24, 2010.

Affected agencies, tribes, and members of the public are invited to comment on this Draft SEIS. Comments may be provided in writing. Written comments are due no later than **5:00 p.m., June 16, 2014** and should be directed to:

Ryan Windish, Planning Manager, AICP  
[ryanw@ci.sumner.wa.us](mailto:ryanw@ci.sumner.wa.us)  
(253) 299-5524 | (253) 299-5539 (fax)

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See the City's web page, <http://www.ci.sumner.wa.us/>, for more information including Planning Commission and City Council meetings related to the project.

Sincerely,

Paul Rogerson, Community Development Director and SEPA Responsible Official

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# FACT SHEET

## Title

City of Sumner 2013 Comprehensive Plan Annual Amendments, Sumner Meadows Docket

## Study Area

The Study Area is generally bounded by Stewart Road on the north, on the east by the BNSF railroad tracks, on the south by 24<sup>th</sup> Street East, and on the west by the White (Stuck) River.

## Proposal and Alternatives

The City of Sumner is considering map and text docket applications to amend its Comprehensive Plan and development regulations related to the surplusage of the Sumner Meadows Golf Course and anticipated private development of light industrial uses, a use that is allowed by underlying zoning. The proposed docket amendments include the following elements, considered together as **Alternative 1 Sumner Meadows Docket Application**:

- **MA-1:** Amendments Related to Surplus City Property: 1) Redesignate approximately 120 acres from Public-Private Utilities and Facilities (PPUF) to M-1, Light Manufacturing; 2) Redesignate approximately 34 acres from Urban Village to M-1, Light Manufacturing; and 3) Amend the Zoning Map to be consistent with the M -1, Light Manufacturing land use designation on the Comprehensive Plan Map by rezoning approximately 28 acres from General Commercial (GC) to M-1.
- **TA-1:** Amend the Land Use Element, Public Private Facilities and Utilities description: Amend the Land Use Element, Public Private Facilities and Utilities description to remove an inconsistency between the descriptions of the land use designation on page 48 with the description on page 50.
- **TA-2:** Amendments related to the Sumner Meadows Golf Course: Amend Parks and Open Space Element (Policies 2.7, 2.10 and Figure 14); Vision Statement; Commuter/Rail Regional Transit Sub-element (Policy 1.6); and Transportation Element (Figures 16 and 17).
- **Other M-1 Zone Amendments:** To reduce the transportation- and energy consumption-related greenhouse gas emissions associated with the Alternative 1 (and other Action Alternatives), the City proposes to provide development incentive options that may include allowing greater building heights or relaxing parking standards for new non-residential construction in the M-1 zone if the owner or operator: provides end-of-trip bicycle facilities to employees, constructs LEED-certified buildings, or participates in the Puget Sound Energy (PSE) Green Power Program. Additionally, the City proposes to require the following mitigation measure for all new non-residential construction in the M-1 zone: Use energy-efficient outdoor lighting.

Alternatives to the Proposal include:

- **Alternative 2 Areawide Industrial Alternative:** This alternative is an extension of docket application MA-1 beyond Sumner Meadows Golf Course to include an areawide redesignation of private vacant lands north and south of Stewart Road east of the White (Stuck) River. Alternative 2 would amend the Comprehensive Plan land use map to apply Light Manufacturing in place of General Commercial, Urban Village, and Public-Private Utilities and Facilities. Implementing zoning would be Light Industrial (M-1). Other text amendments TA-1 and TA-2 would be implemented similar to Alternative 1. M-1 zone incentives and standards to reduce the transportation- and energy consumption-related greenhouse gas emissions would also be implemented.

- **Alternative 3 Areawide Industrial and Residential Alternative:** This areawide alternative would reclassify private properties north of Stewart Road and east of the White (Stuck) River and the Sumner Meadows Golf Course as Light Manufacturing. Implementing zoning would be Light Industrial (M-1). Property west of Sumner Meadows Golf Course owned by Six Kilns Apartments LLC would be designated as Urban Village and zoned as High Density Residential (HDR). This would recognize a development agreement executed between Six Kilns Apartments LLC and City in 2009. Other text amendments TA-1 and TA-2 would be implemented similar to Alternative 1. M-1 zone incentives and standards to reduce the transportation- and energy consumption-related greenhouse gas emissions would also be implemented.
- **Alternative 4 Offsite Alternative:** This alternative proposes to retain the current Comprehensive Plan and zoning designations on the Sumner Meadows Golf Course. Instead, City-owned property designated in the Comprehensive Plan as Public-Private Utilities and Facilities and zoned Agriculture (AG) would be redesignated and rezoned as Light Manufacturing (M-1). This Comprehensive Plan map amendment would require text amendments to the various elements identified in Docket Applications TA-1 and TA-2 except that the focus would be on attaining consistency with regard to this Light Industrial/AG property instead of the Sumner Meadows Golf Course. M-1 zone incentives and standards to reduce the transportation- and energy consumption-related greenhouse gas emissions would also be implemented.
- **Alternative 5 No Action Alternative:** This alternative is the continuation of the City's current Growth Management Act (GMA) Comprehensive Plan that includes a planning period extending to the year 2030. The No Action Alternative is a SEPA-required alternative. With the No Action Alternative, General Commercial, Urban Village, and Public-Private Utilities and Facilities land use map designations would be retained in the Comprehensive Plan. Corresponding General Commercial (GC), Light Industrial (M-1), and High Density Residential (HDR) zoning districts would be retained. No Comprehensive Plan text amendments or zoning amendments would be made.

## Proponent

City of Sumner

## Tentative Date of Implementation

The date of anticipated implementation of the plan and code amendments is Summer 2014.

## Lead Agency

City of Sumner

## Responsible Official

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## Required Licenses and Approvals

As legislative items, the Planning Commission has authority to make recommendations on comprehensive plan and development regulation amendments. The City Council has the authority to approve such amendments.

In addition, the State of Washington Department of Commerce reviews proposed comprehensive plan and development regulation amendments during a 60-day review period prior to adoption. The Puget Sound Regional Council reviews comprehensive plans and in particular transportation element amendments for consistency with regional plans.

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**City of Sumner Community Development Department**

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(GIS)

The analysis in this SEIS was also based on a variety of other technical documentation which is either included as an appendix and shown in the list of appendices or referenced in Chapter 4.

## **Date of Draft Supplemental Environmental Impact Statement Issuance**

May 15, 2014

## **Date Comments Due**

June 16, 2014; see Public Comment.

## **Public Comment**

Affected agencies, tribes, and members of the public are invited to comment on this Draft SEIS. Comments may be provided in writing. Written comments are due no later than **5:00 p.m., June 16, 2014** and should be directed to:

Ryan Windish, Planning Manager, AICP  
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Community Development Department  
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Sumner, WA 98390  
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(253) 299-5539 (fax)  
ryanw@ci.sumner.wa.us

## **Date of Final Action**

Anticipated City of Sumner action is Summer 2014. See Tentative Date of Implementation above.

## **Prior and Future Environmental Review**

The City has issued the following SEPA documents related to its comprehensive plan and relevant to the current study area:

- Final Environmental Impact Statement: City of Sumner Comprehensive Plan Update and Amendments, November 2010: *this EIS is being supplemented by the City of Sumner 2013 Comprehensive Plan Annual Amendments Sumner Meadows Docket SEIS*
- The Fleishmann's Industrial Park, LLC Manufacturing/Industrial Center (MIC) Overlay Expansion Final SEIS issued on February 29, 2012

As appropriate, these environmental review documents have been considered in the preparation of this Draft SEIS.

## **Location of Background Information**

City of Sumner. See Lead Agency and Responsible Official address listed above.

## **Draft Supplemental Environmental Impact Statement Cost**

The purchase price of a copy of the Draft SEIS is based on reproduction costs of printed documents or compact disks (CDs). Hard copies of the Draft SEIS are available for review at City of Sumner Community Development Department, City Hall, 1104 Maple Street, and at the Sumner Library, 1116 Fryar Ave. The document is posted on the City's Web site, <http://www.ci.sumner.wa.us/>.



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# 1.0 SUMMARY

This Chapter describes the Proposal and Alternatives studied in this Supplemental Environmental Impact Statement (SEIS).

## 1.1 Purpose of the Proposal

The City of Sumner wishes to determine the long-term land use for the Sumner Meadows Golf Course property declared surplus to the City's needs (35.94.040 RCW) on March 25, 2013.. The property is located at 14802 Golf Links Drive. The City's Comprehensive Plan currently designates the site as Public/Private Utilities and Facilities and it is within the Urban Village Overlay. Current zoning on the site is a combination of General Commercial (GC) and Light Manufacturing (M-1). The City Council approved a purchase and sale agreement in fall 2013.

The City of Sumner is considering map and text docket applications to amend its Comprehensive Plan and development regulations related to the surplus of the Sumner Meadows Golf Course for private development of light industrial uses, a use that is allowed by underlying zoning.

## 1.2 SEPA Procedures and Public Involvement

This section describes the State Environmental Policy Act (SEPA) and the use of the Draft SEIS to solicit public input.

### 1.2.1 Purpose of the SEIS

This Draft SEIS provides a qualitative and quantitative analysis of environmental impacts as appropriate to the general nature of the map and text docket applications. The adoption of comprehensive plans, amendments, or other long-range planning activities is classified by SEPA as a nonproject (i.e., programmatic) action. A nonproject action is defined as an action that is broader than a specific development project and involves decisions on policies, plans, and programs. An EIS for a nonproject proposal does not require project-specific analyses; instead, the EIS discusses impacts and alternatives appropriate to the scope of the nonproject proposal and to the level of planning for the proposal (Washington Administrative Code [WAC] 197 11-442).

The specific purpose of this Draft SEIS is to assist the public and local government decision makers in considering future growth and land use patterns on the current Sumner Meadows Golf Course site as well as the goals, policies, and development regulations that affect that area as part of the Sumner Comprehensive Plan. These broad decisions will provide direction for more specific actions by the City, as the eventual redevelopment of the golf course moves forward.

This SEIS studies the proposed Comprehensive Plan and zoning amendments associated with the Sumner Meadows Docket application. The current zoning on the Sumner Meadows Golf Course allows for employment uses under any of the studied alternatives. Given its use as a recreation space for a number of years, the City's assumptions for growth, transportation, surface water/flooding, and public services among other topics assumed continued recreation use. Therefore this SEIS studies the effects of cumulatively adding employment growth to the golf course and nearby properties that differ from past assumptions.

### 1.2.2 SEIS Scope

The City is studying whether the proposal would have a probable significant adverse environmental impact on the following elements of the natural and built environment:

- Earth
- Air Quality
- Flooding
- Plants/Animals

- Land Use, Aesthetics, and Socioeconomics
- Relationship to Plans and Policies
- Transportation
- Noise
- Public Services
- Utilities

Topics that were studied in the 2010 Comprehensive Plan EIS and have been identified as having a reasonably probability of being affected by the proposal and/or alternatives are revisited in this Draft SEIS. Topics that were covered in sufficient detail in the 2010 EIS and for which citywide mitigation was proposed were not included.

### 1.3 Proposed Action, Alternatives, and Objectives

As part of describing proposed actions and alternatives, SEPA requires the description of proposal objectives and features. Agencies are encouraged to describe a proposal in terms of objectives, particularly for agency actions to allow for consideration of a wider range of alternatives and measurement of the alternatives alongside the objectives. The following objectives apply to the alternatives reviewed in this SEIS:

- Determine the long-term land use for the Sumner Meadows Golf Course property declared surplus to the City's needs (35.94.040 RCW) on March 25, 2013.
- Reinforce Sumner's role as a manufacturing and industrial center serving south King County and east Pierce County including the City's goal of 20,000 employees in the Manufacturing/Industrial Center.
- Allow for a consistent and compatible land use pattern along Stewart Road and the White (Stuck) River.
- Accommodate the City's fair share of population and employment forecasts to meet GMA requirements and the City vision.
- Protect critical areas and allow for appropriate water quality treatment and stormwater management and reduce or minimize floodplain or flooding impacts.
- Consider docket requests consistent with the annual comprehensive plan review cycle.

The degree to which each alternative accomplishes the objectives is addressed in this Draft SEIS, particularly in Section 3.6, Relationship to Plans and Policies.

#### 1.3.1 Proposed Action Alternatives – Alternatives 1 through 4

##### Alternative 1 Sumner Meadows Docket Application:

The proposed docket amendments that comprise Alternative 1 include the following elements:

- **MA-1:** Amendments Related to Surplus City Property: 1) Redesignate approximately 120 acres under the Comprehensive Plan from Public-Private Utilities and Facilities (PPUF) to M-1, Light Manufacturing; 2) Redesignate approximately 34 acres under the Comprehensive Plan from Urban Village to M-1, Light Manufacturing; and 3) Amend the Zoning Map to be consistent with the M -1, Light Manufacturing land use designation on the Comprehensive Plan Map by rezoning approximately 28 acres from General Commercial (GC) to M-1.
- **TA-1:** Amend the Land Use Element, Public Private Facilities and Utilities description: Amend the Land Use Element, Public Private Facilities and Utilities description to remove an inconsistency between the descriptions of the land use designation on page 48 with the description on page 50.

- **TA-2:** Amendments related to the Sumner Meadows Golf Course: Amend Parks and Open Space Element (Policies 2.7, 2.10 and Figure 14); Vision Statement; Commuter/Rail Regional Transit Sub-element (Policy 1.6); and Transportation Element (Figures 16 and 17).
- **Other M-1 Zone Amendments:** To reduce the transportation- and energy consumption-related greenhouse gas emissions associated with the Alternative 1 (and other Action Alternatives), the City proposes to provide development incentive options that may include allowing greater building heights or relaxing parking standards for new non-residential construction in the M-1 zone if the owner or operator: provides end-of-trip bicycle facilities to employees, constructs LEED-certified buildings, or participates in the Puget Sound Energy (PSE) Green Power Program. Additionally, the City proposes to require the following mitigation measure for all new non-residential construction in the M-1 zone: Use energy-efficient outdoor lighting.

#### **Alternative 2 Areawide Industrial Alternative**

This alternative is an extension of docket application MA-1 beyond Sumner Meadows Golf Course to include an areawide redesignation of private vacant lands north and south of Stewart Road east of the White (Stuck) River. Alternative 2 would amend the Comprehensive Plan land use map to apply Light Manufacturing in place of General Commercial, Urban Village, and Public-Private Utilities and Facilities. Implementing zoning would be Light Industrial (M-1). Other text amendments TA-1 and TA-2 would be implemented similar to Alternative 1. M-1 zone incentives and standards to reduce the transportation- and energy consumption-related greenhouse gas emissions would also be implemented.

#### **Alternative 3 Areawide Industrial and Residential Alternative**

This areawide alternative would reclassify private properties north of Stewart Road and east of the White (Stuck) River and the Sumner Meadows Golf Course as Light Manufacturing. Implementing zoning would be Light Industrial (M-1). Property west of Sumner Meadows Golf Course owned by Six Kilns Apartments LLC would be designated as Urban Village and zoned as High Density Residential (HDR). This would recognize a development agreement executed between Six Kilns Apartments LLC and City in 2009. Other text amendments TA-1 and TA-2 would be implemented similar to Alternative 1. M-1 zone incentives and standards to reduce the transportation- and energy consumption-related greenhouse gas emissions would also be implemented.

#### **Alternative 4 Offsite Alternative**

This alternative proposes to retain the current Comprehensive Plan and zoning designations on the Sumner Meadows Golf Course. Instead City-owned property designated in the Comprehensive Plan as Public-Private Utilities and Facilities and zoned Agriculture (AG) would be redesignated and rezoned as Light Manufacturing (M-1). This Comprehensive Plan map amendment would require text amendments to the various elements identified in Docket Applications TA-1 and TA-2 except that the focus would be on attaining consistency with regard to this Light Industrial/AG property instead of the Sumner Meadows Golf Course. M-1 zone incentives and standards to reduce the transportation- and energy consumption-related greenhouse gas emissions would also be implemented.

### **1.3.2 No Action Alternative – Alternative 5**

Referred to as Alternative 5, this alternative is the continuation of the City's current Growth Management Act (GMA) Comprehensive Plan that includes a planning period extending to the year 2030. The No Action Alternative is a SEPA-required alternative. With the No Action Alternative, General Commercial, Urban Village, and Public-Private Utilities and Facilities land use map designations would be retained in the Comprehensive Plan. Corresponding General Commercial (GC), Light Industrial (M-1), and High Density Residential (HDR) zoning districts would be retained. No Comprehensive Plan text amendments or zoning amendments would be made.

## 1.4 Summary of Impacts

This section describes impacts that are common to the three alternatives studied in this Draft SEIS. For a complete discussion of the elements of the environment considered in the Draft SEIS please refer to Draft SEIS Chapter 3. Section 1.4.2 summarizes the environmental impacts unique to each alternative for each element of the environment evaluated in Chapter 3 of the Draft SEIS. Section 1.5 summarizes potential mitigation measures to reduce impacts.

### 1.4.1 Impacts Common to All Alternatives

This section summarizes impacts common to all studied alternatives. For a complete description, please see Chapter 3, Affected Environment, Impacts, and Mitigation.

#### *Earth*

- An increase in development including buildings, parking areas, and driveways is expected. All new development would be within a volcanic and seismic hazard zone, and structures would face a greater risk of damage.

#### *Air Quality*

- Construction emissions include fugitive dust from excavation and grading activities, diesel-powered engine emissions from construction vehicles and equipment, odors detectable to people in the vicinity of construction activities (such as paving operations), and increases in general traffic-related emissions due to delays caused by construction equipment and material hauling activity. Construction activity and equipment must comply with relevant Puget Sound Clean Air Agency (PSCAA) regulations. However, despite compliance with such regulations, local construction-related emissions could cause temporary, localized impacts to air quality. No slash burning would be permitted in association with any of the studied alternatives.
- Under all of the alternatives, the study area is expected to experience air quality impacts due to commercial/business operations. These operations could cause air pollution issues at adjacent residential properties, unless properly controlled. Sources of such emissions include stationary equipment (such as gas stations), mechanical equipment (such as heating units), and trucks at loading docks at office and retail buildings. However, all new commercial and business facilities would be required to register stationary pollutant-emitting equipment with the PSCAA and comply with PSCAA standards to minimize emissions. Therefore, it is unlikely that new commercial and business operations would cause significant air quality issues.
- Localized tailpipe emissions from vehicles traveling on public roads would be the major source of air pollutant emissions associated with any of the studied alternatives. Potential air quality impacts caused by increased tailpipe emissions are divided into two general categories: Carbon monoxide (CO) hot-spots caused by localized emissions at heavily congested intersections; and regional photochemical smog caused by combined emissions throughout the Puget Sound region. With respect to localized hot-spot air quality, it is unlikely that increased vehicle travel on existing public roads would cause significant localized air pollutant concentrations at local intersections, forming a hot-spot. Furthermore, ongoing U.S. Environmental Protection Agency (EPA) motor vehicle regulations have provided steady decreases in tailpipe emissions from individual vehicles, and it is possible that those continuing decreases from individual vehicles could more than offset the increase in vehicle traffic. For these reasons, it is unlikely that air quality impacts at local intersections would be significant.

- In terms of regional impacts, tailpipe emissions for all of the alternatives would be very small relative to the overall regional tailpipe emissions within the Puget Sound air basin. Based on the Puget Sound Regional Council's (PSRC's) air quality conformity analysis, forecasted regional emissions for its 2040 planning year are far below the allowable budgets. None of the studied alternatives would cause a substantial percentage increase in regional vehicle miles traveled (VMT) throughout the Puget Sound air basin. Therefore, it is concluded none of the alternatives would result in a significant impact to regional air quality.
- Future development with all the alternatives could require future improvements (e.g., street widening) to existing roadways. Roadway widening could result in receptors moving closer to areas where localized levels of mobile source air toxics (MSAT) emissions would be higher, but this could be offset due to reductions in congestion (which are associated with lower MSAT emissions). Furthermore, on a regional basis, the EPA's vehicle and fuel regulations (coupled with ongoing future fleet turnover) will, over time, result in significantly lower region-wide MSAT levels in most cases.

### ***Flooding***

- Because of the currently permitted projects that include filling in the floodplain and King County's Countyline Levee Project, results of the hydraulic model indicate that during the 1%-annual-chance-flood event (100-year flood), surface waters would rise and flooding may occur at several locations for any of the alternatives. The amount of rise and location of flooding varies for each alternative.

### ***Plants/Animals***

- Changes to the City's Comprehensive Plan and Land Use Map would match zoning and allow an increase in development intensity. New development in the area could reduce the amount of habitat for song birds, small mammals and the birds of prey and larger mammals that prey on them in the form of undeveloped areas (the golf course) and herbaceous vegetation common on vacant land habitat.
- Development in the southeast corner of the fields located between the White River Tailrace and 24th Street could impact two identified wetlands. Specific wetland impacts would be reviewed along with a specific development proposal and impacts would be required to be mitigated per City, state, and federal wetland policies and regulations.

### ***Land Use, Aesthetics, and Socioeconomics***

#### LAND USE

- All of the Action Alternatives would change the mix of Land Use and Zoning designations from current conditions. Under any of the alternatives, there would be some degree of land use intensification. On City-owned properties, the present Comprehensive Plan designation Public and Private Facilities and Utilities is implemented by zoning of M-1 Light Industrial (Golf Course), GC (Golf Course), and Agriculture (AG, City leased agriculture sites). The M-1 and GC zones allow for light industrial and commercial uses, while agriculture is the predominate allowed use on the southern City owned property.
- On private lands, north and south of Stewart Road, properties are currently undeveloped and designated for GC and Urban Village designations implemented by GC and HDR zoning. A variety of retail, commercial or multi-family uses is currently allowed on these properties.

#### POPULATION, EMPLOYMENT AND HOUSING

- Based on development assumptions for each of the alternatives, capacity for population, housing and jobs would change. The type and direction of change depends on the alternative.

## SUMNER MEADOWS DOCKET SEIS | SUMMARY

### AESTHETICS

- Under all of the alternatives, new development is allowed and likely to occur during the planning horizon of the current Comprehensive Plan. Development is likely to change in character to match the surrounding development, predominantly light industrial. The height, bulk and scale of new development would follow the City's design and development code requirements. City code also requires buffers and setbacks to mitigate potential conflicts between incompatible land uses. Current zoning of the subject properties and zoning under the alternatives includes three zones, which would determine the massing of new buildings.

### ***Relationship to Plans and Policies***

#### GROWTH MANAGEMENT ACT

- The alternatives are generally consistent with GMA goals. Alternatives 1 through 4 that reduce open space on the golf course or City-owned agricultural land but that retain open space and recreation through the White (Stuck) River riparian corridor and trail would support the GMA goal on retaining open space. The Parks and Open Space Plan would indicate additional open space to satisfy GMA; GMA does not have a specific numeric open space requirement. All alternatives further economic development goals, particularly Alternatives 1, 2, and 3

#### MULTICOUNTY PLANNING POLICIES

- VISION 2040 contains a variety of elements addressing regional growth and development. All of the alternatives would be consistent with the Multicounty Planning Policies. Depending on the specific features of the alternative some of the policies may be achieved to a greater degree.

#### COUNTYWIDE PLANNING POLICIES

- The Countywide Planning Policies (CPPs) are extensive across a variety of growth management topics. In general, the proposed comprehensive plan updates and zoning changes would not directly conflict with any applicable CPPs. By changing the land use pattern within the study area, the alternatives may modify how the City complies with the CPPs.

#### SUMNER VISION AND COMPREHENSIVE PLAN ELEMENTS

- The Sumner Vision Statement includes broad references to open space, agriculture, and employment. None of the alternatives would directly conflict with the City's Vision and Comprehensive Plan Policies. Conversions of the golf course or agricultural property south of it would be supported by require some text amendment of the Comprehensive Plan.
- The Vision encompasses the whole City and is not specific to the study area; the City is to balance and weigh the Vision Statement. All Alternatives would promote continued economic development. While open space and recreation area would diminish under Alternatives 1, 2, and 3, and agricultural use would diminish under Alternative 4, the City would retain land important for habitat, open space, and recreation along the White (Stuck) River. In the remainder of the City, the watersheds, schools, and parks would continue to provide open space, parks, and recreation. Under Alternative 5, the Vision Statement would still be supported.
- Redesignation of lands classified Public and Private Facilities and Utilities to Light Manufacturing would be consistent with the broader planned Light Manufacturing land use in the valley.
- Under all alternatives studied, land along the White (Stuck) River would stay in public designation and use for trail, open space, habitat restoration and flood control purposes. The White (Stuck) River open space corridor is intended to enhance the work environment with trails as well as provide riparian habitat.

- The conversion of the City-owned agricultural land under Alternative 4 would reduce the use in the city. Alternatives 1, 2, 3, and 5 would not redesignate the City-owned agricultural land. Alternatives 2 and 3 assume the conversion of private land mapped by the City as agricultural resource lands north and south of Stewart Road. The conversion of the agricultural land would reduce the use in the city; however, the lands are not considered of long-term commercial significance because: 1) the land is isolated from other agricultural properties in Pierce County; 2) the land is surrounded by urban development inside city limits; 3) the lands have land values reflecting their location in a city with services and infrastructure and intensity of nearby industrial use, and 4) there is no transfer of development rights program per WAC 365-190-050.

#### SUMNER ZONING CODE

- Action Alternatives 1, 2, 3, and 4 would require changes to zoning to match the Comprehensive Plan. Alternative 5 (No Action) would not require a change. Applying zoning consistent with the Comprehensive Plan achieves compatibility under all alternatives.

#### SUMNER SHORELINE MASTER PROGRAM

- All alternatives would be subject to the use standards and shoreline development regulations in the SMP, including a 100 foot setback for structures along part of the golf course to 16<sup>th</sup> Street, and 200 feet on the balance of the White (Stuck) River. None of the alternatives propose water-oriented uses; however, water-oriented recreation and habitat would be retained along the shoreline under all alternatives.

#### **Transportation**

- **Traffic Operations** – Eight intersections are projected to operate at LOS E or LOS F in 2030 with all alternatives. Of these, four intersections located in Sumner (Traffic Avenue/Main Street, Alder Avenue/Main Street, Traffic Avenue/SR 410 westbound ramps, Traffic Avenue/SR 410 eastbound ramps) are not subject to the LOS D concurrency standard, as per existing adopted City Transportation Element policies 3.1 and 3.3 (City of Sumner 2012). The remaining four intersections are stop-sign controlled. East Valley Highway/Elm Street is projected to operate at LOS E and 160th Avenue E/Main Street is projected to operate at LOS F with Alternative 5 (No Action). These two intersections are located more than two miles south of the alternative sites, and the SEIS action alternatives are expected to add very little additional delay (less than 4 seconds per vehicle) at these locations. 136th Avenue E/24th Street E and SR 167 southbound ramps/Stewart Road SE are both projected to operate at LOS F with Alternative 5 (No Action). Since these intersections are located near the alternative sites the SEIS alternatives are expected to add a greater amount of delay at these locations. The SR 167 southbound ramps/Stewart Road SE intersection is operating at LOS F under existing conditions. Additional traffic generated by regional growth, as well as by the SEIS alternatives, is expected to worsen conditions at this intersection. However, this intersection, located in the City of Pacific, is a designated as a highway of statewide significance (HSS) facility and would not be subject to local city standards; it is under Washington State Department of Transportation (WSDOT) jurisdiction.
- **Freight Movement** – The majority of trips generated by all SEIS alternatives are expected to travel between the alternative sites and SR 167, via Stewart Road SE and 24th Street E. Because all alternatives would include industrial development similar in character to the existing industrial uses in the area, it is expected that they would generate truck traffic similar in proportion to that currently generated along Stewart Road SE and 24th Street E. However, both corridors are have Freight and Goods Transportation System (FGTS) designations established by WSDOT, and are identified by the City as truck routes. Additional truck traffic generated by the SEIS alternatives would be similar to what is already occurring on Stewart Road SE and 24th Street E, and is consistent with local and statewide policies.

- **Site Access, Circulation, and Parking** – With all alternatives, the facilities and site design needed to support internal vehicle access, circulation, parking, pedestrian movement, and bicycle movement would be determined at the project level when specific development proposals are submitted. Vehicular and non-motorized access and circulation, as well as parking requirements, would be subject to City development code. The requirement would be documented in the traffic impact analysis completed as part of project-level SEPA review.
- **Transit** – With no fixed-route transit service provided in the vicinity of the proposal study area, it is expected that none of the alternatives would generate transit demand.

### **Noise**

- Construction of infrastructure, housing, and business facilities would result in temporary noise impacts during daytime hours due to the use of heavy equipment and hauling of construction materials. SMC 15.34 limits construction activity for commercial and industrial facilities to daytime hours on weekdays, weekends, and prohibits work on holidays. This would prevent construction noise impacts during periods when most people are at home sleeping.
- Future industrial and commercial facilities could use stationary mechanical equipment that, unless properly designed or controlled, could cause community noise levels to exceed the allowable City noise ordinance limits. In addition, future facilities could use outdoor loading docks and outdoor material storage areas that, unless properly designed and controlled, could generate substantial amounts of noise in the surrounding community.
- Future commercial and industrial facilities would likely increase traffic volumes on existing public roads. However, due to the small size of the study area and the limited square footage of allowable development in that area, it is unlikely that the cumulative traffic volumes generated by new commercial and industrial facilities would be high enough to cause a significant increase in traffic noise at sensitive receiver locations along the roads.
- If the City used WSDOT funds to add new lanes or widen the roadway at intersections to accommodate additional truck traffic associated with the proposed actions, then the traffic noise level at sensitive receiver locations could exceed WSDOT's Noise Abatement Criteria. This could trigger the WSDOT requirement to model noise impacts and evaluate noise abatement, and to present the results of the analysis in project-level NEPA and SEPA environmental documentation for the roadway widening project.

### **Public Services**

- **Law Enforcement:** New development under all alternatives would increase demand for law enforcement services, though the precise level of demand would vary by alternative. Law enforcement patrols and responses would be necessary under all development scenarios, though development of residential uses would generate the highest law enforcement demand.
- **Fire and Emergency Medical:** New development under all alternatives would increase demand for fire protection and emergency medical services, though the precise level of demand would vary by alternative. Demand resulting from residential development is likely to be require mostly emergency medical responses, while commercial and industrial development may require more fire and hazardous materials responses.
- **Parks and Recreation:** All action alternatives would result in a reduction in overall recreational land, as well as increases in demand for recreational facilities (parks and trails), though the precise level of demand would vary by alternative.
- **Schools:** Alternatives 3 and 5 allow residential development, generating new students. Alternatives 1, 2, and 4 would create no additional demand for educational services.

- **Solid Waste:** Development of the project area under all alternatives would increase the amount of solid waste generated and directed to regional landfills and recycling and composting centers.

#### **Utilities**

- **Water:** Development under all action alternatives would increase water demand in the study area, though precise levels of demand generated by each alternative would vary by the intensity of development proposed.
- **Wastewater:** Development under all action alternatives would increase wastewater flows from the study area, requiring conveyance and treatment, thus placing greater demand on the City's wastewater collection system.
- **Stormwater:** Additional development under action alternatives will substantially increase the amount of impervious surfaces in the study area, which has the potential to increase stormwater flows requiring detention and treatment.
- **Telecommunications:** Telecommunication services are provided by private service providers. The cost of provided satisfying increased demand would be borne by the providers, and no significant impacts associated with telecommunications are anticipated under any of the studied alternatives.

### **1.4.2 Summary of Impacts by Alternative**

Table 1-1 summarizes unique impacts of each alternative by environmental topic. The discussion is intentionally brief, and the reader is encouraged to read the full discussion of impacts in Chapter 3 in the context of the affected environment and impact analysis. Mitigation measures would be applied as noted in Section 1.5 and Chapter 3.

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**Table 1-1. Summary Comparison of Impacts Unique to Each Alternative**

Topics	Alternatives				
	Alternative 1 Sumner Meadows Docket Application	Alternative 2 Areawide Industrial Alternative	Alternative 3 Areawide Industrial and Residential Alternative	Alternative 4 Offsite Alternative	Alternative 5 No Action Alternative
3.1 Earth	Potential new uses would be limited to industrial uses on the golf course, but would be within a volcanic and seismic hazard zone, and structures would face a risk of damage.	Potential new uses would be limited to industrial uses on and near the golf course, but would be within a volcanic and seismic hazard zone, and structures would face a risk of damage.	In addition to industrial uses being within the volcanic and seismic hazard zone, residential uses would be located in geologically hazardous areas as well.	New uses and structures on the off-site AG property would be at risk from location in the volcanic and seismic hazard zone.	The area is within the volcanic and seismic hazard zone. Current and allowed uses would not change.
3.2 Air Quality	<p>Development under this alternative would result in higher future localized greenhouse gas (GHG) emissions within the study area compared to Alternatives 2, 4, and 5. However, GHG emissions for this alternative would be lower than Alternative 3.</p> <p>Under this alternative, City-wide emissions would show an increase of 30,169 metric tons per year compared to the No Action Alternative. This increase exceeds the SEPA significance threshold of 25,000 metric tons per year of GHG emissions (increase compared to future no action). However, in accordance with Washington State Department of Ecology guidance (adopted by the City) a proposal is presumed to be not significant when it is expected to result in emissions of 25,000 metric tons or more of GHG emissions per year but has incorporated mitigation measures to reduce its emissions by approximately 11% below what its emission would have been without those mitigation measures. Therefore, because the City has incorporated mitigation measures to reduce the emissions resulting from Alternative 1 by 12% below what its emission would have been without those mitigation measures, the impacts are not considered significant.</p> <p>The alternative would have a slight increase in vehicle miles traveled (VMT) above the No Action Alternative, but would have a negligible impact on regional air quality.</p>	<p>Development under this alternative would result in higher future localized GHG emissions within the study area compared to Alternatives 4 and 5. However, GHG emissions for this alternative would be lower than Alternatives 1 and 3.</p> <p>Under this alternative, City-wide emissions would show an increase of 29,361 metric tons per year compared to the No Action Alternative. This increase exceeds the SEPA significance threshold of 25,000 metric tons per year of GHG emissions (increase compared to future no action). However, because the City has incorporated mitigation measures to reduce the emissions resulting from Alternative 2 by 13% below what its emission would have been without those mitigation measures, the impacts are not considered significant.</p> <p>The alternative would have a slight increase in VMT above the No Action Alternative, but would have a negligible impact on regional air quality.</p>	<p>Development under this alternative would result in the highest future localized GHG emissions within the study area of all the alternatives studied.</p> <p>Under this alternative, City-wide emissions would show an increase of 32,118 metric tons per year compared to the No Action Alternative. This increase exceeds the SEPA significance threshold of 25,000 metric tons per year of GHG emissions (increase compared to future no action). However, because the City has incorporated mitigation measures to reduce the emissions resulting from Alternative 3 by 12% below what its emission would have been without those mitigation measures, the impacts are not considered significant.</p> <p>The alternative would have a slight increase in VMT above the No Action Alternative, but would have a negligible impact on regional air quality.</p>	<p>Development under this alternative would result in the lowest future localized GHG emissions within the study area of all the alternatives studied.</p> <p>Under this alternative, City-wide emissions would show a decrease of 235 metric tons per year compared to the No Action Alternative.</p> <p>The alternative would have a slight increase in VMT above the No Action Alternative, but would have a negligible impact on regional air quality.</p>	<p>The No Action alternative would result in higher future localized GHG emissions within the study area compared to Alternative 4. However, GHG emissions for this alternative would be lower than Alternatives 1, 2, and 3.</p>
3.3 Flooding	Hydraulic modeling indicates potential increases in 100-year water surface elevations compared to Alternative 5 (No Action) that are generally less than 1 foot downstream of 24 <sup>th</sup> Street, 1 to 2 feet between 24 <sup>th</sup> Street and the trail bridge, and less than 0.5 feet between the trail bridge and Stewart Road. The maximum increase is 1.84 feet and occurs at RS 19083 which is between 24 <sup>th</sup> Street and the Lake Tapps tailrace.	Potential impacts would be the same as under Alternative 1.	Potential impacts would be the same as under Alternative 1.	Alternative 4 was found to have potential increases in 100-year water surface elevations compared to Alternative 5 (No Action) that are generally less than 1 foot in the study area except along the reach of the White (Stuck) River adjacent to the Sumner Meadows Golf Course upstream of 24 <sup>th</sup> Street where increases ranged from 1 to 2 feet.	Hydraulic modeling shows that during the 1%-annual-chance-flood event (100-year flood), surface elevations would rise and flow would begin to spill from the mainstem of the White (Stuck) River onto the Sumner Meadows property (left overbank) downstream of RS 9503. Flows would be conveyed through the Sumner Meadows property downstream.

Topics	Alternatives				
	Alternative 1 Sumner Meadows Docket Application	Alternative 2 Areawide Industrial Alternative	Alternative 3 Areawide Industrial and Residential Alternative	Alternative 4 Offsite Alternative	Alternative 5 No Action Alternative
3.4 Plants/Animals	<p>New development would remove the golf course's open areas as habitat for some songbirds and small mammals.</p> <p>Development could impact identified wetlands north of the tailrace. City and federal wetlands regulations would require mitigation for any impacts.</p> <p>No impacts to fish from new development would be anticipated provided development is constructed consistent with existing City stormwater and shoreline regulations and development standards.</p>	<p>The potential for impacts under Alternative 2 would be the same for those noted under Alternative 1 on the golf course property.</p> <p>Development could impact identified wetlands north of the tailrace. City and Federal wetlands regulations would require mitigation for any impacts.</p> <p>No additional impacts to plants and animals would be anticipated.</p>	<p>The potential for impacts under Alternative 3 would be the same for those noted under Alternative 1 on the golf course property.</p> <p>Development could impact identified wetlands north of the tailrace. City and Federal wetlands regulations would require mitigation for any impacts.</p> <p>No additional impacts to plants and animals would be anticipated.</p>	<p>Conversion of the Agricultural property would result in the loss of habitat for some song-bird and small mammal species.</p> <p>There are no known undisturbed or high quality habitats, listed or threatened terrestrial species, or wetlands present on the site.</p>	<p>Under this alternative, no Comprehensive Plan text or map changes and no zoning amendments would be made. No impacts to plant or animals would be anticipated.</p>
3.5 Land Use, Aesthetics, and Socioeconomics	<p>The Sumner Meadows Golf Course would develop with industrial uses under the Light Manufacturing Comprehensive Plan designation and Light Industrial (M-1) zoning, replacing current recreational open space uses.</p> <p>The City's conceptual development plan for the golf course assumes approximately 3.5 million square feet of new high cube warehouse and manufacturing space.</p> <p>The intensification of warehouse and manufacturing use would increase employment capacity, which could increase local activity, traffic, and noise in the vicinity. Surrounding land uses are generally compatible with industrial uses.</p> <p>Development of the HDR zoned property adjacent to the golf course with residential structures would introduce the only residential development in the immediate area and could create an incompatibility between residential and industrial uses.</p> <p>No population capacity would be created. Employment capacity would increase by 3,523 new jobs.</p> <p>The golf course would convert to an industrial site with more buildings and impervious area, with warehouse type buildings surrounded by parking and loading bays.</p> <p>Buildings would reach 35 to 45 feet in height and would generally match the scale of surrounding warehouse and industrial buildings.</p> <p>The White (Stuck) River shoreline would be retained in its undeveloped and vegetated state and under City ownership.</p>	<p>The golf course would develop under the Light Industrial (M-1) zone. Impacts from that development would be the same as described for Alternative 1. Private properties north and south of Stewart Road would convert to M-1 zoning.</p> <p>The intensification of warehouse and manufacturing use would increase employment, which could increase local activity, traffic, and noise in the vicinity.</p> <p>Approximately 40 acres more than under Alternative 1 could be developed for industrial rather than commercial or mixed uses.</p> <p>No population capacity would be created. Employment capacity would increase by 3,752 new jobs.</p> <p>Aesthetic impacts would be similar to Alternative 1. The change in character of the golf course and surrounding properties would effect a substantial change in the character of the immediate area.</p>	<p>The Sumner Meadows Golf Course would develop with industrial uses under the Light Manufacturing Comprehensive Plan designation and Light Industrial (M-1) zoning, replacing current recreational open space uses.</p> <p>Impacts from that development would be the same as described for Alternative 1.</p> <p>The parcel west of the golf course, if developed as HDR, could represent a potential incompatibility as the only residential development in the area.</p> <p>This alternative would increase housing capacity with an assumed 450 new residential units and 990 new persons (based on a 2.2 person household size). It could also generate new capacity for up to 3,651 new jobs.</p> <p>Similar to Alternatives 1 and 2, Alternative 3 would also represent a substantial change to the current aesthetic environment.</p>	<p>Land use on the Sumner Meadows Golf Course would remain unchanged. The agricultural property immediately to the south of the golf course would change to a Light Manufacturing designation and Light Industrial (M-1) zoning.</p> <p>Development of that property could result in an increase of approximately 300,000 square feet of cube warehouse, warehouse or manufacturing space.</p> <p>No population capacity would be created. Employment capacity would increase by 302 new jobs.</p> <p>Alternative 4 would represent the least change to the current aesthetic environment.</p> <p>New industrial development under this alternative would represent a less substantial visual change.</p> <p>The change in character of the property would change the views in the immediate area. Views from the golf course would be different.</p>	<p>Under this alternative, no Comprehensive Plan text or map changes would be made. The underlying zoning for Light Industrial (M-1) and General Commercial (GC) would be retained. No changes to the City's capacity for housing or employment would result.</p>

Topics	Alternatives				
	Alternative 1 Sumner Meadows Docket Application	Alternative 2 Areawide Industrial Alternative	Alternative 3 Areawide Industrial and Residential Alternative	Alternative 4 Offsite Alternative	Alternative 5 No Action Alternative
3.6 Relationship to Plans and Policies	<p>Alternative 1 would not directly conflict with GMA Policies, Multicounty Planning Policies, Countywide Planning Policies or City Plans and Policies.</p> <p>Alternative 1 would promote continued economic development growth and would contribute to the City's MIC job goals.</p> <p>Open space and recreation area would diminish under Alternative 1.</p>	<p>Alternative 2 is similar to Alternative 1 in terms of policy consistency. It would provide for the greatest job growth and potential to contribute to the City's MIC job goals.</p> <p>Open space and recreation area would diminish under Alternative 2.</p> <p>Alternative 2 would remove the ability to develop housing in the study area.</p>	<p>Alternative 3 is similar to Alternative 1 in terms of policy consistency and reaching job growth and MIC goals.</p> <p>Open space and recreation area would diminish under Alternative 3.</p> <p>Alternative 3 promotes housing variety with mixed use or high density residential designations.</p>	<p>Alternative 4 would not directly conflict with GMA Policies, Multicounty Planning Policies, Countywide Planning Policies or City Plans and Policies.</p> <p>Alternative 4 would promote continued economic development. Alternative 4 would include less employment development than Alternatives 1, 2 and 3.</p> <p>Open space and recreation area would diminish, but less than under Alternatives 1, 2, and 3.</p>	<p>The No Action Alternative (Alternative 5) would retain the current Comprehensive Plan land use designations and text descriptions.</p> <p>Alternative 5 promotes housing variety with mixed use or high density residential designations to the west and north.</p> <p>Alternative would not result in no loss of public open space.</p>
3.7 Transportation	<p>Projected to generated 1,405 additional PM peak hour trips (528 inbound, 877 outbound) compared to Alternative 5 No Action.</p> <p>Two additional intersections are projected to have operational deficiencies in 2030:</p> <ul style="list-style-type: none"> <li>• West Valley Highway/SR 167 southbound ramps – projected to degrade from LOS D (with No Action) to LOS E – located in Sumner but under WSDOT jurisdiction.</li> <li>• 142nd Avenue E/24th Street E – projected to degrade from LOS B (with No Action) to LOS F – located in Sumner.</li> </ul>	<p>Projected to generated 1,355 additional PM peak hour trips (506 inbound, 849 outbound) compared to Alternative 5 No Action.</p> <p>Projected to result in operational impacts to West Valley Highway/SR 167 southbound ramps and 142nd Avenue/24th Street E that are similar to Alternative 1.</p>	<p>Projected to generated 1,542 additional PM peak hour trips (636 inbound, 906 outbound) compared to Alternative 5 No Action.</p> <p>Projected to result in operational impacts to West Valley Highway/SR 167 southbound ramps and 142nd Avenue/24th Street E that are similar to Alternative 1.</p>	<p>Projected to generated 93 additional PM peak hour trips (37 inbound, 56 outbound) compared to Alternative 5 No Action.</p> <p>No additional traffic operational impacts are identified for this alternative.</p>	<p>No additional transportation impacts are identified for this alternative.</p>
3.9 Noise	<p>This alternative is expected to generate slightly less jobs than under Alternatives 2 and 3, but significantly more jobs than under Alternatives 4 and 5. This alternative would result in industrial operations within 800 feet of existing multi-family townhomes north of Lake Tapps Parkway East; however, steep terrain between the residences and the existing golf course land is anticipated to serve as a noise barrier. Additionally, this alternative would result in industrial operations that are adjacent to the east of land that is zoned for High Density Residential (HDR) development.</p> <p>Traffic noise impacts from nearby roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed.</p>	<p>This alternative is expected to generate more jobs than any other alternative. This alternative would result in new industrial operations within 800 feet of existing multi-family townhomes north of Lake Tapps Parkway East; however, steep terrain between the existing golf course land and these homes is anticipated to serve as a noise barrier.</p> <p>Traffic noise impacts from nearby roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed.</p>	<p>This alternative is expected to generate more jobs than Alternatives 1, 4, and 5, but less jobs than Alternative 2. Additionally, this alternative would increase the population more than the other alternatives. This alternative would result in industrial operations that are adjacent to the east of land that is zoned for HDR development. Additionally, this alternative would result in an expansion of the HDR-zoned land adjacent to the west and create additional noise-sensitive receptors that could be impacted by noise from surrounding industrial and commercial facilities. Also, this alternative would result in industrial operations within 800 feet of existing multi-family townhomes north of Lake Tapps Parkway East; however, steep terrain between the residences and the existing golf course is anticipated to serve as a noise barrier.</p> <p>Traffic noise impacts from nearby roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed.</p>	<p>This alternative is expected to generate the fewest jobs of all alternatives. However, this alternative would create industrial and commercial operations in close proximity to existing low density single-family residences to the west. The closest of these homes is within 500 feet of the proposed industrial land, and existing barriers are trees along the White (Stuck) River shoreline.</p> <p>Traffic noise impacts from nearby roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed.</p>	<p>This alternative is expected to generate more jobs than Alternative 4, but less jobs than Alternatives 1, 2, and 3. The Urban Village overlay would allow a mix of commercial and residential uses. Under this alternative, the local population would increase more than Alternatives 1, 2, and 4, but less than Alternative 3. Commercial uses could have activities that produce noise affecting on-site and off-site residential uses.</p> <p>Increased traffic under this alternative would be centered around the Urban Village on Stewart Road, which is already very busy and congested. Noise from traffic could impact new residences in the Urban Village overlay.</p>

Topics	Alternatives				
	Alternative 1 Sumner Meadows Docket Application	Alternative 2 Areawide Industrial Alternative	Alternative 3 Areawide Industrial and Residential Alternative	Alternative 4 Offsite Alternative	Alternative 5 No Action Alternative
3.8 Public Services	<p><b>Law Enforcement</b></p> <ul style="list-style-type: none"> <li>Increased employment would create a demand for law enforcement patrols and police response.</li> </ul> <p><b>Fire/EMS</b></p> <ul style="list-style-type: none"> <li>Increased industrial development could increase risk for fires and hazardous materials releases.</li> </ul> <p><b>Parks and Recreation</b></p> <ul style="list-style-type: none"> <li>There would be a minor increase in trail usage from employment uses. No significant impacts are anticipated.</li> </ul> <p><b>Schools</b></p> <ul style="list-style-type: none"> <li>No new students would be generated, and no impacts to schools are anticipated.</li> </ul> <p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>Additional employment would increase solid waste production. With mitigation, no significant impacts are anticipated.</li> </ul>	<p><b>Law Enforcement</b></p> <ul style="list-style-type: none"> <li>Increased employment would create a demand for law enforcement patrols and police response.</li> </ul> <p><b>Fire/EMS</b></p> <ul style="list-style-type: none"> <li>Increased industrial development could increase risk for fires and hazardous materials releases.</li> </ul> <p><b>Parks and Recreation</b></p> <ul style="list-style-type: none"> <li>There would be a minor increase in trail usage from employment uses. No significant impacts are anticipated.</li> </ul> <p><b>Schools</b></p> <ul style="list-style-type: none"> <li>No new students would be generated, and no impacts to schools are anticipated.</li> </ul> <p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>Additional employment would increase solid waste production. With mitigation, no significant impacts are anticipated.</li> </ul>	<p><b>Law Enforcement</b></p> <ul style="list-style-type: none"> <li>Increased residential capacity (990 new residents) would create demand for additional patrols, police response, and approximately 1.98 additional police officers. Increased employment would create a demand for law enforcement patrols and police response.</li> </ul> <p><b>Fire/EMS</b></p> <ul style="list-style-type: none"> <li>New residential capacity would be created adjacent to industrial uses, with both uses generating additional demand for fire/EMS service.</li> </ul> <p><b>Parks and Recreation</b></p> <ul style="list-style-type: none"> <li>New residential capacity (990 residents) would create demand for additional recreational facilities, based on the City's adopted Level of Service (LOS) standards. See Chapter 3.10.2 for a complete list of facility needs.</li> </ul> <p><b>Schools</b></p> <ul style="list-style-type: none"> <li>Additional residential capacity would generate approximately 109 additional students for local schools. The City does not collect school impact fees for multifamily development for the district.</li> </ul> <p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>Additional development would increase solid waste production. With mitigation, no significant impacts are anticipated.</li> </ul>	<p><b>Law Enforcement</b></p> <ul style="list-style-type: none"> <li>Increased employment would create a demand for law enforcement patrols and police response.</li> </ul> <p><b>Fire/EMS</b></p> <ul style="list-style-type: none"> <li>Increased industrial development could increase risk for fires and hazardous materials releases.</li> </ul> <p><b>Parks and Recreation</b></p> <ul style="list-style-type: none"> <li>There would be a minor increase in trail usage from employment uses. No significant impacts are anticipated.</li> </ul> <p><b>Schools</b></p> <ul style="list-style-type: none"> <li>No new students would be generated, and no impacts to schools are anticipated.</li> </ul> <p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>Additional employment would increase solid waste production. With mitigation, no significant impacts are anticipated.</li> </ul>	<p><b>Law Enforcement</b></p> <ul style="list-style-type: none"> <li>Growth under currently adopted plans would increase demand for law enforcement patrols and police response.</li> </ul> <p><b>Fire/EMS</b></p> <ul style="list-style-type: none"> <li>Growth under currently adopted plans could increase risk for fires and hazardous materials releases. Demand would be less intensive than Alternatives 1, 2, or 3, but greater than Alternative 4.</li> </ul> <p><b>Parks and Recreation</b></p> <ul style="list-style-type: none"> <li>There would be a minor increase in trail usage from growth under adopted plans. No significant impacts are anticipated.</li> </ul> <p><b>Schools</b></p> <ul style="list-style-type: none"> <li>Growth under currently adopted plans could generate approximately 9 additional students. Impacts to schools would be minimal.</li> </ul> <p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>Additional development under adopted plans would increase solid waste production. With mitigation, no significant impacts are anticipated.</li> </ul>
3.9 Utilities	<p><b>Water</b></p> <ul style="list-style-type: none"> <li>129,906 gallons of additional water demand (3.5% of source capacity)</li> </ul> <p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>328,005 gallons of additional wastewater flow</li> </ul> <p><b>Stormwater</b></p> <ul style="list-style-type: none"> <li>Maximum of 166.63 acres of impervious surface allowed</li> </ul> <p><b>Telecommunications</b></p> <ul style="list-style-type: none"> <li>No impacts. See Impacts Common to All Alternatives.</li> </ul>	<p><b>Water</b></p> <ul style="list-style-type: none"> <li>138,350 gallons of additional water demand (3.7% of source capacity)</li> </ul> <p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>290,904 gallons of additional wastewater flow</li> </ul> <p><b>Stormwater</b></p> <ul style="list-style-type: none"> <li>Maximum of 167.83 acres of impervious surface allowed</li> </ul> <p><b>Telecommunications</b></p> <ul style="list-style-type: none"> <li>No impacts. See Impacts Common to All Alternatives.</li> </ul>	<p><b>Water</b></p> <ul style="list-style-type: none"> <li>219,018 gallons of additional water demand (5.9% of source capacity)</li> </ul> <p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>373,734 gallons of additional wastewater flow</li> </ul> <p><b>Stormwater</b></p> <ul style="list-style-type: none"> <li>Maximum of 161.56 acres of impervious surface allowed</li> </ul> <p><b>Telecommunications</b></p> <ul style="list-style-type: none"> <li>No impacts. See Impacts Common to All Alternatives.</li> </ul>	<p><b>Water</b></p> <ul style="list-style-type: none"> <li>11,136 gallons of additional water demand (0.3% of source capacity)</li> </ul> <p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>155,379 gallons of additional wastewater flow</li> </ul> <p><b>Stormwater</b></p> <ul style="list-style-type: none"> <li>Maximum of 60.84 acres of impervious surface allowed</li> </ul> <p><b>Telecommunications</b></p> <ul style="list-style-type: none"> <li>No impacts. See Impacts Common to All Alternatives.</li> </ul>	<p><b>Water</b></p> <ul style="list-style-type: none"> <li>31,484 gallons of additional water demand (0.9% of source capacity)</li> </ul> <p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>168,717 gallons of additional wastewater flow</li> </ul> <p><b>Stormwater</b></p> <ul style="list-style-type: none"> <li>Maximum of 79.22 acres of impervious surface allowed</li> </ul> <p><b>Telecommunications</b></p> <ul style="list-style-type: none"> <li>No impacts. See Impacts Common to All Alternatives.</li> </ul>

## 1.5 Mitigation Measures

This SEIS includes incorporated plan features and applicable regulations and commitments for each topic covered within each section of Chapter 3, Affected Environment, Impacts, and Mitigation. In addition, other potential mitigation measures are proposed which are summarized in Table 1-2.

The list of mitigation measures is based on the programmatic analysis of the proposed Comprehensive Plan and zoning amendments associated with the Sumner Meadows Docket application. Some mitigation measures would be considered during future specific environmental reviews of the study area, while others would guide the City in future legislative reviews of its Comprehensive Plan and development regulations.

**Table 1-2. Summary of Incorporated Plan Features, Regulations and Commitments, and Potential Mitigation Measures**

Topics	Mitigation Measures
<p><b>3.1 Earth</b></p>	<ul style="list-style-type: none"> <li>• The City has adopted the International Building Code (SMC 15.08.010) and a City Erosion Control Ordinance (SMC 16.05) to reduce the impacts caused by earthquakes, soil instability, and erosion.</li> <li>• The City is a member of the Pierce County Emergency Management System and has adopted an emergency management ordinance for the reduction of risk from situations like earthquakes and volcanic eruptions or mudflows.</li> <li>• The City will continue to enforce critical areas regulations pertaining to floodplains (SMC 16.58).</li> <li>• The City will pursue implementation of mitigation measures outlined in the Pierce County Natural Hazard Mitigation Plan (Pierce County 2009).</li> <li>• The City has adopted a critical areas ordinance that provides limitations on certain types of development; noticing and reporting requirements for development within volcanic hazard areas, and seismic hazard areas (SMC 16.52 and 16.54).</li> <li>• The geotechnical evaluation prepared by PanGeo indicates likely future conditions of approval for future development allowed under Action Alternatives. These measures include pre-loading, foundation and footing system design considerations, parking area asphalt design, and compliance with the International Building Code standards, among other requirements and considerations.</li> </ul>
<p><b>3.2 Air Quality</b></p>	<p>The City proposes several development incentive options listed in Section 3.2.3. There are also various City, state, regional and federal requirements related to air quality. A list of these is also contained in Section 3.2.3.</p> <p><b>Construction Emission Control</b></p> <ul style="list-style-type: none"> <li>• The City should require all construction contractors to implement air quality control plans for construction activities in the study area. The air quality control plans should include best management practices (BMPs) to control fugitive dust and odors emitted by diesel construction equipment.</li> <li>• During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. The following BMPs would be used to control fugitive dust.             <ul style="list-style-type: none"> <li>○ Use water sprays or other non-toxic dust control methods on unpaved roadways.</li> <li>○ Minimize vehicle speed while traveling on unpaved surfaces.</li> <li>○ Prevent trackout of mud onto public streets.</li> <li>○ Cover soil piles when practical.</li> <li>○ Minimize work during periods of high winds when practical.</li> </ul> </li> <li>• Mobile construction equipment and portable stationary engines would emit air pollutants including nitrogen oxides (NO<sub>x</sub>), CO, and diesel particulate matter. These emissions would be temporary and localized. It is highly unlikely that the temporary emissions would cause ambient pollutant concentrations at adjoining parcels to approach the federal limits. Typical mitigation measures to minimize air quality and odor issues caused by tailpipe emissions include the following:             <ul style="list-style-type: none"> <li>○ Maintain the engines of construction equipment according to manufacturers’ specifications.</li> <li>○ Minimize idling of equipment while the equipment is not in use.</li> </ul> </li> </ul>

Topics	Mitigation Measures
	<ul style="list-style-type: none"> <li>Burning of slash or demolition debris would not be permitted without express approval from the PSCAA. No slash burning is anticipated for any construction projects in the study area.</li> </ul> <p><b>Incorporated Greenhouse Gas Reduction Measures</b></p> <ul style="list-style-type: none"> <li>The City will provide development incentive options (e.g., greater building heights or relaxing parking standards for new non-residential construction) if the owner or operator: provides end-of-trip bicycle facilities to employees; constructs LEED-certified buildings; or participates in the Puget Sound Energy Green Power Program.</li> <li>The City will require the use of energy-efficient outdoor lighting for all new non-residential construction.</li> </ul> <p><b>Additional Greenhouse Gas Reduction Measures</b></p> <ul style="list-style-type: none"> <li>GHG emissions reductions could be provided by implementing transportation policies or using prudent building design and construction methods to use recycled construction materials, reduce space heating and electricity usage, and reduce water consumption and waste generation. Tables 3.2-6 and 3.2-7 in Section 3.2, “Air Quality,” lists a variety of mitigation measures that could reduce GHG emissions caused by transportation facilities, building construction, space heating, and electricity usage. The table lists potential GHG reduction measures, and indicates where the emissions reductions might occur. The City could require development applicants to identify the reduction measures in their projects, and explain why other measures are not included or are not applicable. See Section 3.2 for more detail.</li> </ul>
<p><b>3.3 Flooding</b></p>	<ul style="list-style-type: none"> <li>Any projects in the Study Area would have to comply with all City requirements listed in Section 3.3.</li> <li>A series of conceptual mitigation measures are proposed that enacted together would decrease the anticipated surface water elevation for all alternatives to zero rise. See Section 3.3 for the list of conceptual mitigation actions.</li> </ul>
<p><b>3.4 Plants/Animals</b></p>	<ul style="list-style-type: none"> <li>The City’s shoreline regulations limit development within 200 feet of the White (Stuck) River shoreline, which would preserve that area as habitat.</li> <li>The City plans to retain ownership of that 200 foot area.</li> <li>The City’s shoreline regulations require that any permitted development or activities in the shoreline include mitigation to achieve no net loss of shoreline functions.</li> <li>Although the White (Stuck) River shorelines are structurally modified through the city, riparian habitat is vegetated and unmodified. Under, the City’s shoreline regulations (SMC Title 16), light industrial uses would not be considered water-dependent and would not be allowed within 200 feet of the river’s ordinary high water mark. Any proposed development would also have to meet stormwater management requirements (SMC 13.36) and landscaping standards.</li> <li>The City is contemplating a boundary line adjustment that would retain the 200-foot shoreline jurisdiction in the City’s ownership. No other mitigation measures are proposed.</li> </ul>
<p><b>3.5 Land Use, Aesthetics, and Socioeconomics</b></p>	<ul style="list-style-type: none"> <li>Any projects in the Study Area would have to comply with all City requirements listed in Section 3.5.3.</li> </ul> <p><b>Land Use and Aesthetics</b></p> <ul style="list-style-type: none"> <li>Design review is required for all new multifamily, commercial, and industrial developments; the review must consider the context of the site and potential for incompatibility.</li> <li>Current M-1 zoning regulations require lighting shields, fencing, and additional landscaping and setbacks where commercial and industrially zone properties border residentially zoned property.</li> </ul> <p><b>Population, Employment, and Housing</b></p> <ul style="list-style-type: none"> <li>Zoning regulations implement the Comprehensive Plan to further the City’s policies for business development, population and residential growth, and community character.</li> <li>The City’s zoning code furthers Comprehensive Plan policies for housing density, types of housing, and character.</li> </ul> <p><b>Other Potential Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>The City is considering retaining ownership of the 200-foot shoreline jurisdiction along the White (Stuck) River which would provide a buffer between uses on the opposite bank as well as additional flood mitigation.</li> </ul>
<p><b>3.6 Relationship to Plans and Policies</b></p>	<ul style="list-style-type: none"> <li>Alternatives 1, 2, and 3 would amend the Comprehensive Plan text, policies and map to: 1) reduce text conflicts including the two descriptions of the Public and Private Facilities and Utilities, 2) remove conflicts with references to the golf course, and 3) adjust policies on open space retention to recognize the future redevelopment of the study area.</li> </ul>

Topics	Mitigation Measures
	<ul style="list-style-type: none"> <li>• Under any of the Action Alternatives, the City would adopt M-1 code amendments and incentives to reduce future emission levels below a threshold recommended by Ecology. See the Section 3.2 of this SEIS.</li> <li>• The Sumner Municipal Code includes zoning and design standards intended to allow for compatible development.</li> <li>• The City could pursue additional service from pierce County Transit based additional trips.</li> </ul>
<p><b>3.7 Transportation</b></p>	<ul style="list-style-type: none"> <li>• Build-out of Alternatives 1 through 4 would require that the City add the 24<sup>th</sup> Street Extension project to its long-range Transportation Improvement Plan. The City’s current TIP includes a corridor study for this connection as Project</li> <li>• With the No Action and all Action alternatives, any new development projects proposed within the alternative sites would be subject to the following regulations as part of project-level SEPA review. <ul style="list-style-type: none"> <li>• Project-level traffic impact analyses are required, which typically include a development-level analysis of roadway operations, safety, parking, access, and non-motorized impacts.</li> <li>• Proposed projects must also pay road impact fees established under the Concurrency Management System (SMC Chapter 12.36) to contribute their share toward citywide transportation improvement projects identified to support growth in development.</li> <li>• The development must adhere to the City's development code, including parking requirements and guidelines for frontage and non-motorized improvements.</li> </ul> </li> <li>• Roadway capacity improvements common to all alternatives <ul style="list-style-type: none"> <li>▪ East Valley Highway/Elm Street – Install a traffic signal (Jurisdiction: City of Sumner).</li> <li>▪ 160th Avenue E/Main Street – Install a traffic signal (Jurisdiction: City of Sumner).</li> <li>▪ 136th Avenue E/24th Street E – Install a traffic signal (Jurisdiction: City of Sumner).</li> <li>▪ SR 167 southbound ramps/Stewart Road SE – Install a traffic signal and coordinate with the signal at East Valley Highway/Jovita Boulevard E (Jurisdiction: WSDOT/City of Pacific for SR 167 southbound ramps/Stewart Road SE, Pierce County for East Valley Highway/Jovita Boulevard E).</li> </ul> </li> <li>• Additional roadway capacity improvements for Alternatives 1 through 3 <ul style="list-style-type: none"> <li>▪ West Valley Highway/SR 167 southbound ramps – Potentially change current westbound configuration were from double right-turn lanes and a single left-turn lane, to double left-turn lanes and a single right-turn lane, and modify phasing to provide for protected westbound left turns and allow two receiving lanes on southbound West Valley Highway. Review of AM peak hour volumes would need to be conducted to determine if this reconfiguration can be accommodated in the morning. If not, the westbound leg could be widened to provide double left-turn and double right-turn lanes. It is also possible that WSDOT could choose to allow this intersection to operate at LOS E if future traffic growth occurs at the rate projected through 2030. (Jurisdiction: WSDOT/City of Sumner)</li> <li>▪ 142nd Avenue E/24th Street E – Install a traffic signal. Provide a left-turn lane and right-turn lane in the southwest direction. Operations at this intersection would be studied in detail as part of the 24th Street Corridor Study (Project A9 in the City’s 2014-2019 TIP), which could result in different improvements at this intersection based on a comprehensive corridor-wide strategy. (Jurisdiction: City of Sumner)</li> </ul> </li> <li>• At all existing stop-controlled intersections currently projected to operate at LOS E or LOS F by 2030, traffic signal warrants established in the <i>Manual for Uniform Traffic Control Devices</i> (FHWA 2012) would typically need to be met before a traffic signal is installed. It is possible for a stop-controlled intersection to operate at LOS E or LOS F during the PM peak hour without having high enough overall traffic volumes to meet signal warrant criteria. In this case, the agency with jurisdiction (City or WSDOT) may need to adopt policy that allows a higher level of service until such time that traffic volumes are high enough to warrant installation of a traffic signal.</li> </ul>
<p><b>3.9 Noise</b></p>	<ul style="list-style-type: none"> <li>• Policies encouraging alternative modes of transportation could reduce the potential for transportation noise sources.</li> <li>• All alternatives include Transportation Element policies that promote bike paths, trails, and sidewalks.</li> <li>• The No Action Alternative would allow for on-site mixed uses, including residential, that could allow for more non-motorized travel and access to nearby public transit facilities.</li> <li>• The City could require each industrial or commercial facility proposed for construction within 500 feet of residentially zoned parcels to conduct a project-specific community noise impact</li> </ul>

Topics	Mitigation Measures
	<p>assessment to demonstrate compliance with the City’s noise ordinance.</p> <ul style="list-style-type: none"> <li>For Planned Mixed-Use Developments, the City could require compliance with the noise ordinance for non-residential land uses within the study area parcels, as well as for uses on adjacent parcels.</li> </ul>
<p><b>3.8 Public Services</b></p>	<p>Any projects in the Study Area would have to comply with all City requirements listed in Section 3.9.3.</p> <p>Police Services</p> <ul style="list-style-type: none"> <li>The City should continue to monitor demand for services and review staffing levels, particularly police, and equipment needs through the normal annual budgeting process.</li> </ul> <p>Fire and Emergency Medical Services</p> <ul style="list-style-type: none"> <li>The City and East Pierce Fire and Rescue (EPF&amp;R) should review the precise fire protection and emergency medical needs of proposed development prior to building permit issuance to ensure that EPF&amp;R can adequately respond to anticipated incidents, including specialized needs for handling hazardous materials if applicable.</li> </ul> <p>Parks and Recreation</p> <ul style="list-style-type: none"> <li>Industrial development in the study area should be required to provide adequate visual screening along trail corridors to preserve aesthetic qualities. On-site trail access should be preserved where public safety allows.</li> <li>The City should consider the collection of park mitigation fees for large developments such as large multifamily proposals that have the potential to increase demand on City parks. The City may also require onsite open space for use by residents.</li> </ul> <p>Schools</p> <ul style="list-style-type: none"> <li>The City, along with Dieringer School District and Auburn School District, should consider modification of the City’s impact fees to account for multifamily residential development in the service areas of these districts.</li> </ul> <p>Solid Waste</p> <ul style="list-style-type: none"> <li>Future industrial and multifamily developments would contract directly for solid waste services with service providers, which in Sumner is DM Disposal.</li> </ul>
<p><b>3.9 Utilities</b></p>	<ul style="list-style-type: none"> <li>The Sumner Comprehensive Plan and Water, Wastewater and Stormwater functional plans would be applicable to all alternatives, including level of service and low impact development policies.</li> <li>All development in Sumner is required to comply with the City’s stormwater regulations as established in the City’s 2011 Stormwater Comprehensive Plan and the 2010 Washington State Department of Ecology Stormwater Manual, adopted by SMC 13.48.030.</li> </ul> <p>Water and Wastewater</p> <ul style="list-style-type: none"> <li>Prior to issuance of a building permit, the applicant shall prepare and submit a detailed analysis of the effects of their proposed project design on the City’s water and wastewater systems, to be reviewed by the City. The analysis must consider existing and planned utility infrastructure in the vicinity and estimate water demand and sewer flows resulting from the project.</li> </ul> <p>Stormwater</p> <ul style="list-style-type: none"> <li>Prior to issuance of a building permit, the applicant shall provide an analysis of projected stormwater flows resulting from the project for City review. The analysis shall include a stormwater control plan that illustrates flow control and water quality features, as well as discharge points, and demonstrate how the proposed project will meet the requirements of the City’s stormwater design requirements and the latest edition of the Washington State Department of Ecology Stormwater Manual adopted by the City at the time of permit application.</li> </ul>

## 1.6 Significant Unavoidable Adverse Impacts

This section summarizes Significant Unavoidable Adverse Impacts. For a complete description, please see Chapter 3, Affected Environment, Impacts, and Mitigation.

### Earth

Application of mitigation measures will reduce potential adverse impacts of new development on earth resources. Because the study area is in a seismic and volcanic geologic hazard area, development in the area poses an increased risk to structures and to the people living or working in the area. Alternatives 3 and 5 would increase the number of residents subject to the risk. Alternatives 1, 2 and 3 have substantially higher employment capacities. This could increase the daytime population at risk in the area. However, all of the alternatives, including the No Action Alternative are likely to result in additional employment uses where employees could be at risk.

### Air Quality

No significant unavoidable adverse impacts on regional or local air quality are anticipated. Temporary, localized dust and odor impacts could occur during the construction activities. The regulations, incorporated plan features, and other mitigation measures described above are adequate to mitigate any adverse impacts anticipated to occur as a result of study area growth increases.

### Flooding

New development and associated fill in the floodplain of the White (Stuck) River would increase impervious surfaces and decrease flood storage. As a result, surface water elevations would rise and localized flooding may occur during the 1%-annual-chance-flood event (100-year flood). If proposed mitigation is enacted, no significant unavoidable adverse impacts are anticipated. The potential impacts and conceptual mitigation in this SEIS are based on a stated set of assumptions. If those assumptions were to change, impacts and mitigation would need to be remodeled to meet City requirements.

### Plants/Animals

Under any of the alternatives, new development is likely to occur on vacant, undeveloped, or agricultural lands, which represent some low quality terrestrial habitat. Development would be required to comply with the City's critical areas regulations and other mitigation measures. Lastly, the forested shorelines of the White (Stuck) River will likely be retained and preserved. Therefore, no significant adverse impacts have been identified

### Land Use, Aesthetics, and Socioeconomics

#### *Land Use*

All of the action alternatives would result in capacity for additional development on the golf course or AG properties. Under the No Action Alternative, commercial and industrial development of the private properties north and south of Stewart Road would still be allowed. All of the alternatives would have the typical effects of development such as changes to the local land use pattern and increases activity levels, traffic and noise. The localized land use impacts associated with new development could be mitigated by landscaped buffers and design guidelines. Additional noise and traffic mitigation measures are addressed in Section 3.8, Noise and 3.7, Transportation, respectively. Thus, no significant, unavoidable, and adverse impacts have been identified.

#### *Aesthetics*

The vicinity of the properties being considered by this analysis is currently vacant, recreational, or agricultural land. The visual character is generally open with unobstructed views through the subject properties. New development currently allowed under the No Action Alternative and potential new development allowed under the Action Alternatives, would result in changes to the current visual character of the area, and introduce greater bulk and scale, particularly on the golf course property which is large and relatively open currently. The significance of the

change depends, in large, on the values of the viewer as well as the design of structures and successful implementation of required screening. Light industrial development would be consistent with surrounding land uses to the north and south, but may be less compatible adjacent to residential development to the west as is proposed in Alternatives 1 and 3. Development under all alternatives would be subject to mitigation measures in the form of policies, development regulations, design standards, and, in some cases, design review. All of these would mitigate for potentially adverse impacts to the visual quality of the area. Therefore no unavoidable significant adverse impacts are anticipated.

***Population, Employment, and Housing***

Employment could increase under all of the alternatives. Additional employment growth could result in secondary impacts on the natural and built environment and on the demand for public services. Population and the number of housing units could increase under Alternative 1 and 3 only, which would affect the natural and built environment and the demand for public services. Mitigation measures addressing other secondary impacts on the natural and built environment and the demand for public services are addressed in other sections of this SEIS. Thus, no unavoidable and adverse impacts have been identified.

***Relationship to Plans and Policies***

All alternatives are generally consistent with GMA goals and the City’s Vision, but there are differences in emphasis. All alternatives would emphasize economic development goals, particularly Alternatives 1, 2, and 3. All Action Alternatives would reduce the City’s percentage of open space goals and policies, but would not conflict with the Parks and Open Space Plan levels of service standards and would retain open space along the White (Stuck) River. All alternatives would promote growth in the city limits and would be subject to City critical area, shoreline, stormwater, public service and infrastructure requirements. The City will weigh and harmonize the goals.

With implementation of Alternative plan and zoning amendments and mitigation measures, plan and policy consistency would be achieved under any of the Action Alternatives

***Transportation***

As shown in Section 3.7.4, Exhibit 3-30 ,with identified mitigation measures in place, no significant unavoidable adverse impacts are identified.

***Noise***

Noise levels would likely increase in the study area from short-term and long-term noise sources. However, implementation of appropriate mitigation measures could reduce or eliminate noise impacts on noise-sensitive receivers.

***Public Services***

With the incorporation of the mitigation measures identified above, no significant unavoidable adverse impacts are anticipated.

***Utilities***

Under all alternatives, potential development in the study area would likely increase the use of utility services and would place greater demand on both public and private utility infrastructure. With the incorporation of the mitigation measures identified above, no significant unavoidable adverse impacts are anticipated.

**1.7 Major Issues, Significant Areas of Controversy and Uncertainty, and Issues to be Resolved**

Issues to be resolved include adoption of amendments to the City of Sumner Comprehensive Plan and zoning code to facilitate future redevelopment of the Sumner Meadows Golf Course. Key environmental issues include:

- Allowing growth that contributes to greenhouse gas emissions and the associated code amendments and incentives promoting energy conservation and non-motorized travel modes to reduce such emissions.
- Addressing the cumulative effects of potential future activities (Alternatives 1-5) on flooding and associated conceptual mitigation to mitigate the anticipated increases in water surface elevations during high flow events.
- The potential of new development allowed under the Action Alternatives to change the current visual character of the area, and introduce greater bulk and scale, particularly on the golf course property which is large and relatively open currently, and the application of the City's design guidelines to reduce impacts.
- The reduction in the City's percentage of open space goals and policies; however, consistency with the Parks and Open Space Plan levels of service standards and retention of open space along the White (Stuck) River.
- Roadway operational impacts for the SEIS alternatives and associated roadway improvement and policy-based mitigation measures that mitigate the impacts.
- The potential for land use and noise impacts if residential uses are allowed west of the Sumner Meadows Golf Course, and the potential to reduce such effects through the City owned riverfront and landscape buffers and application of noise standards.
- The increased demand for public services and utilities by the increase in job and mixed use growth under the alternatives.



## 2.0 DESCRIPTION OF THE PROPOSAL AND ALTERNATIVES

This Chapter describes the Proposal and Alternatives studied in this Draft Supplemental Environmental Impact Statement (Draft SEIS).

### 2.1 Overview of Proposal and Alternatives

The City of Sumner is considering map and text docket applications to amend its Comprehensive Plan and development regulations related to the anticipated surplus of the Sumner Meadows Golf Course for private development of light industrial uses, a use that is allowed by underlying zoning. The proposed docket amendments include the following elements, considered together as **Alternative 1 Sumner Meadows Docket Application**:

- *MA-1: Amendments Related to Surplus City Property:* 1) Redesignate approximately 120 acres from Public-Private Utilities and Facilities to M-1, Light Manufacturing; 2) Redesignate approximately 34 acres from Urban Village to M-1, Light Manufacturing; and 3) Amend the Zoning Map to be consistent with the M -1, Light Manufacturing land use designation on the Comprehensive Plan Map by rezoning approximately 28 acres from General Commercial (GC) to M-1.
- *TA-1: Amend the Land Use Element, Public Private Facilities and Utilities description:* Amend the Land Use Element, Public Private Facilities and Utilities description to remove an inconsistency between the descriptions of the land use designation on page 48 with the description on page 50.
- *TA-2: Amendments related to the Sumner Meadows Golf Course:* Amend Parks and Open Space Element (Policies 2.7, 2.10 and Figure 14); Vision Statement; Commuter/Rail Regional Transit Sub-element (Policy 1.6); and Transportation Element (Figures 16 and 17).
- **Other M-1 Zone Amendments:** To reduce the transportation- and energy consumption-related greenhouse gas emissions associated with the Alternative 1 (and other Action Alternatives), the City proposes to provide development incentive options that may include allowing greater building heights or relaxing parking standards for new non-residential construction in the M-1 zone if the owner or operator: provides end-of-trip bicycle facilities to employees, constructs LEED-certified buildings, or participates in the Puget Sound Energy (PSE) Green Power Program. Additionally, the City proposes to require the following mitigation measure for all new non-residential construction in the M-1 zone: Use energy-efficient outdoor lighting.

Alternatives to the Proposal include:

- **Alternative 2 Areawide Industrial Alternative:** This alternative is an extension of docket application MA-1 beyond Sumner Meadows Golf Course to include an areawide redesignation of private vacant lands north and south of Stewart Road east of the White (Stuck) River. Alternative 2 would amend the Comprehensive Plan land use map to apply Light Manufacturing in place of General Commercial, Urban Village, and Public-Private Utilities and Facilities. Implementing zoning would be Light Industrial M-1. Other text amendments TA-1 and TA-2 and M-1 zoning incentives and standards to reduce greenhouse gas emissions would be implemented similar to Alternative 1.
- **Alternative 3 Areawide Industrial and Residential Alternative:** This areawide alternative would reclassify private properties north of Stewart Road and east of the White (Stuck) River and the Sumner Meadows Golf Course as Light Manufacturing. Implementing zoning would be Light Industrial (M-1). Property west of Sumner Meadows Golf Course owned by Six Kilns Apartments LLC would be designated as Urban Village and zoned as High Density Residential (HDR). This would recognize a development agreement executed between Six Kilns Apartments LLC and City in 2009. Other text amendments TA-1 and TA-2 and M-1 zoning incentives and standards to reduce greenhouse gas emissions would be implemented similar to Alternative 1.

- **Alternative 4 Offsite Alternative:** This alternative proposes to retain the current Comprehensive Plan and zoning designations on the Sumner Meadows Golf Course. Instead City-owned property designated in the Comprehensive Plan as Public-Private Utilities and Facilities and zoned Agriculture (AG) would be redesignated and rezoned as Light Manufacturing (M-1). This Comprehensive Plan map amendment would require text amendments to the various elements identified in Docket Applications TA-1 and TA-2 except that the focus would be on attaining consistency with regard to this Light Industrial/AG property instead of the Sumner Meadows Golf Course. M-1 zoning incentives and standards to reduce greenhouse gas emissions would be implemented similar to Alternative 1.
- **Alternative 5 No Action Alternative:** This alternative is the continuation of the City’s current Growth Management Act (GMA) Comprehensive Plan that includes a planning period extending to the year 2030. The No Action Alternative is a SEPA-required alternative. With the No Action Alternative, General Commercial, Urban Village, and Public-Private Utilities and Facilities land use map designations would be retained in the Comprehensive Plan. Corresponding General Commercial (GC), Light Industrial (M-1), and High Density Residential (HDR) zoning districts would be retained. No Comprehensive Plan text amendments or zoning amendments would be made.

## 2.2 City of Sumner Comprehensive Plan

The Growth Management Act (GMA)—adopted by the 1990 Washington State Legislature and amended periodically thereafter—contains a comprehensive framework for managing growth and development in local jurisdictions. The *City of Sumner Comprehensive Plan* (Comprehensive Plan) includes the following elements consistent with GMA:

- Land Use, including the following sub-elements:
  - Land Use
  - Cultural Resources
  - Essential Public Facilities
  - Commuter Rail/Regional Transit
  - Permit Process
  - Plan Monitoring and Amendment
  - Governance
- Economic Development
- Community Character
- Parks and Open Space
- Environment
- Housing
- Transportation
- Capital Facilities and Public Services
- Utilities
- Family and Human Services
- Shoreline

The Comprehensive Plan addresses a horizon year of 2030 and has a capacity for growth intended to meet growth targets developed with Pierce County in the Countywide Planning Policies. The Comprehensive Plan land use map provides for a variety of land use classifications including residential, commercial, mixed use, industrial, and institutional uses, several of which are under review in this SEIS. Annually the City allows amendment of its Comprehensive Plan and, in conjunction, considers development regulation amendments that implement the Comprehensive Plan. This SEIS considers the potential impacts of development that could be allowed under current and alternative Comprehensive Plan policies and land use map designations, as well as implementing zoning designations.

## 2.3 Environmental Review

The SEIS for the 2013 annual amendments proposed for the Sumner Meadows Golf Course supplements the Final EIS for the City of Sumner Comprehensive Plan Update and Amendments issued on November 24, 2010.

Where relevant this Draft SEIS also draws information from the Fleishmann's Industrial Park, LLC Manufacturing/Industrial Center (MIC) Overlay Expansion Final SEIS issued on February 29, 2012.

The purpose of this Draft SEIS is to assist the public and local government decision makers in considering future growth and land use patterns in the Sumner Meadows Golf Course vicinity as well as associated amendments to policies and development regulations. This section describes the study area, scope, and level of analysis addressed in this Draft SEIS.

### **2.3.1 Study Area**

The Study Area is generally bound by Stewart Road (formerly called 8th Street) on the north, on the east by the BNSF railroad tracks, on the south by 24<sup>th</sup> Street East, and on the west by the White (Stuck) River.

The study areas for each of the five alternatives are shown in Exhibit 2-1. Based on the acres of change in the Comprehensive Plan Land Use Map, the Sumner Meadows Golf Course is approximately 154 acres (excludes lands to be reserved along the river as Public-Private Utilities and Facilities), and is located south of Stewart Road bounded on the east by the BNSF railroad tracks and on the west by the White (Stuck) River and on the south by 24th Street East. The site address is 14802 Golf Links Drive, Sumner, WA 98390. This is the Study Area for Alternatives 1 and 5.

Areawide amendments in Alternatives 2 and 3 consider the 154 acres of the Sumner Meadows Golf Course and an additional 39.98 acres of property that would be reclassified all located north and south of Stewart Road east of the White (Stuck) River, west of the BNSF railroad tracks, and north of 24<sup>th</sup> Street.

Alternative 4 addresses City owned property designated Public-Private Utilities and Facilities and zoned Agriculture (AG) and light Industrial (M-1), lying south of the Cascade Water Alliance tailrace facility, west of the BNSF railroad, and east of the White (Stuck) River. The property equals approximately 107.89 acres.

The total land area of the golf course, private lands considered for reclassification north and south of Stewart Road, and the City-owned agricultural land is approximately 346.58 acres.



**2.3.2 Scope of SEIS**

The State Environmental Policy Act (SEPA) (Revised Code of Washington [RCW] 43.21C) requires government officials to review the environmental consequences of a proposal before implementing it, and to consider better or less damaging ways of accomplishing it. As described in the SEPA Rules (Washington Administrative Code [WAC] 197-11-405(4)), the purpose of an SEIS is to add information and analysis to supplement the information in a previous EIS. An SEIS may address new alternatives; scoping for an SEIS is optional.

Although optional, the City conducted scoping for this SEIS to allow for public comment opportunities. The City issued a Determination of Significance and Scoping Notice on October 31, 2013. The comment period closed on November 25, 2013.

Based on the scoping process this SEIS addresses the following elements of the natural and built environment:

- Earth
- Air Quality
- Flooding
- Plants and Animals
- Land Use, Aesthetics, and Socioeconomics
- Relationship to Plans and Policies
- Transportation
- Noise
- Public Services
- Utilities

Appendix A of the Draft SEIS provides the scoping notice and copies of comments. Exhibit 2-2 summarizes comments received and where the topic is addressed in the SEIS.

**Exhibit 2-2. Scoping Comment Topics and Response or Location Addressed in Supplemental Environmental Impact Statement**

Topic	Response or Location Addressed
<b>Alternatives</b>	
Consideration of removing the entire Urban Village Overlay south of Stewart Road and designating for M-1 and consideration limiting the Urban Village Overlay to the HDR zone west of the golf course. This would include changes to zoning map for consistency.	These two options are considered as Alternatives 2 and 3 along with the comprehensive plan map change of the golf course to M-1.
<b>Traffic/Transportation</b>	
Proposed location and design of a North Access Road Intersection at Stewart Road.	Chapter 3.7 Transportation. The Draft SEIS considers linkages with surrounding areas as well as planned projects.
Assumptions used in analyzing impacts to traffic and transportation resulting from implementation of the alternatives – specifically the assumed land uses.	Chapter 3.7 Transportation. The Draft SEIS relies on land use estimates developed for the City’s land capacity analysis. See Section 3.6.
The vehicle mix anticipated to result from uses of rezoned property. Particularly the potential impacts from increased truck traffic and increased truck traffic during non-peak periods.	Chapter 3.7 Transportation. The Draft SEIS considers employment uses and freight and other vehicular access.
Potential impacts to safety, non-motorized facilities, parking and/or queuing.	Chapter 3.7 Transportation. These issues are

Topic	Response or Location Addressed
<b>Floodplain</b>	considered programmatically in the Draft SEIS.
Potential impacts to human safety, property and environmental resources from development within/near the White (Stuck) River and its floodplains.	Chapter 3.3 Flooding. The Draft SEIS will programmatically reviews potential impacts of designation changes with and adjacent to the White (Stuck) River and its floodplain.
Consistency of the proposed land use map changes with local, state and federal floodplain management plans, policies and regulations.	Chapter 3.3 Flooding. The Draft SEIS programmatically reviews plans and policies including those for wetlands protection, floodplain management and restoration plans.
<b>Public Services</b>	
Consistency of proposals with City’s public services plans and policies	Chapter 3.9 Public Services. The Draft SEIS considers City level of service policies and functional plans.

**2.3.3 Level of Analysis**

This Draft SEIS provides a qualitative and quantitative analysis of environmental impacts at a scale appropriate to the general nature of the proposed amendments. Comprehensive plan and zoning amendments are classified, along with other long-range planning activities, by SEPA as a nonproject (i.e., programmatic) action. A nonproject action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans, and programs. An EIS for a nonproject proposal does not require site-specific analyses; instead, the EIS discusses impacts and alternatives appropriate to the scope of the nonproject proposal and to the level of planning for the proposal (Washington Administrative Code [WAC] 197 11-442). This document provides a level of analysis allowing City decision makers to make informed policy decisions on the proposal. Future site-specific development proposals on the properties considered in the SEIS would require project-specific SEPA review as appropriate.

This SEIS studies the proposed Comprehensive Plan and zoning amendments associated with the Sumner Meadows Docket application. The current zoning on the Sumner Meadows Golf Course allows for employment uses under any of the studied alternatives. Given its use as a recreation space for a number of years, the City’s assumptions for growth, transportation, surface water / flooding, and public services among other topics assumed continued recreation use. Therefore this SEIS studies the effects of cumulatively adding employment growth to the golf course and nearby properties that differ from past assumptions.

**2.4 Alternatives**

This section provides a description of objectives guiding the development and evaluation of alternatives, and the action and no action alternatives including comparisons of land use, zoning, and potential growth.

**2.4.1 Objectives**

As part of describing proposed actions and alternatives, SEPA requires the description of proposal objectives and features. Agencies are encouraged to describe a proposal in terms of objectives, particularly for agency actions to allow for consideration of a wider range of alternatives and measurement of the alternatives alongside the objectives. The following objectives apply to the alternatives reviewed in this SEIS:

- Determine the long-term land use for the Sumner Meadows Golf Course property declared surplus to the City's needs (35.94.040 RCW) on March 25, 2013.

- Reinforce Sumner’s role as a manufacturing and industrial center serving south King County and east Pierce County including the City’s goal of 20,000 employees in the Manufacturing/Industrial Center.
- Allow for a consistent and compatible land use pattern along Stewart Road and the White (Stuck) River.
- Accommodate the City’s fair share of population and employment forecasts to meet GMA requirements and the City vision.
- Protect critical areas and allow for appropriate water quality treatment and stormwater management and reduce or minimize floodplain or flooding impacts.
- Consider docket requests consistent with the annual comprehensive plan review cycle.

The degree to which each alternative accomplishes the objectives is addressed in this Draft SEIS, particularly in Section 3.6, Relationship to Plans and Policies.

## 2.4.2 Proposed Action Alternatives (Alternatives 1-4)

### *Alternative 1 Sumner Meadows Docket Application*

Alternative 1 represents the City’s proposed docket amendments and included map and text amendments to the City’s comprehensive plan as well as map amendments to the City’s zoning map. The following changes are proposed under Alternative 1:

#### COMPREHENSIVE PLAN CHANGES:

- 120 acres north of 24<sup>th</sup> Street E would be redesignated from Public-Private Utilities and Facilities to M-1, Light Manufacturing<sup>1</sup>.
- Approximately 34 acres immediately south of Stewart Road would be redesignated from Urban Village to M-1, Light Manufacturing.

#### ZONING MAP CHANGES

Current zoning on most of the golf course (Light Industrial) M-1, would be consistent with the proposed comprehensive plan map changes and would not change. Areas that are inconsistent would be changed to be consistent with the M -1, Light Manufacturing land use designation on the Comprehensive Plan Map. Approximately 28 acres would be rezoned from General Commercial (GC) to M-1.

#### COMPREHENSIVE PLAN TEXT CHANGES

- Amend the Land Use Element, Public Private Facilities and Utilities description to remove an inconsistency between the description of the land use designation on page 48 with the description on page 50.
- Amend Parks and Open Space Element (Policies 2.7, 2.10 and Figure 14); Vision Statement; Commuter/Rail Regional Transit Sub-element (Policy 1.6); and Transportation Element (Figures 16 and 17).

#### M-1 ZONING CHANGES

To reduce the transportation- and energy consumption-related greenhouse gas emissions associated with the Alternative 1 (and other Action Alternatives), the City proposes to provide development incentive options that may include allowing greater building heights or relaxing parking standards for new non-residential

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<sup>1</sup> The Comprehensive Plan Map shows Light Industrial but the text references Light Manufacturing the terms “Light Manufacturing” and “Light Industrial” are used interchangeably in the text and mean the same thing.

construction in the M-1 zone if the owner or operator adopts one or more of the following mitigation measures:

- Provide end-of-trip bicycle facilities to employees. It is estimated that providing an incentive for this measure would result in at least a 0.03% study area-wide reduction on the increase in employee vehicle trips for the action alternatives compared to existing conditions.
- Construct LEED-certified buildings. It is estimated that providing an incentive for this measure would result in at least a 3.8% reduction in study area-wide non-residential building energy use (natural gas and electricity) for new construction for the action alternatives compared to existing conditions.
- Participate in the PSE Green Power Program. It is estimated that providing an incentive for this measure would result in at least a 0.5% reduction in study area-wide non-residential building electricity use for new construction for the action alternatives compared to existing conditions.

Additionally, the City proposes to require the following mitigation measure for all new non-residential construction in the M-1 zone:

- Use energy-efficient outdoor lighting. It is estimated that requiring more energy-efficient outdoor lighting would result in a 0.8% reduction in electricity use for new non-residential construction within the study area for the action alternatives compared to existing conditions.

Under Alternative 1, no new residential capacity would be added to the City. However, substantial new employment capacity (3,523 new jobs) would be added based on proposed M-1 zoning. The City (and UGA) currently has an excess employment capacity. This Alternative would further increase the excess. The proposed Comprehensive Plan map changes are shown in Exhibit 2-3. Zoning map amendments area shown in Exhibit 2-4. Resulting changes to projected population and employment estimates are shown in Exhibit 2-13.

Exhibit 2-3. Alternative 1 Sumner Meadows Docket Application – Comprehensive Plan Map

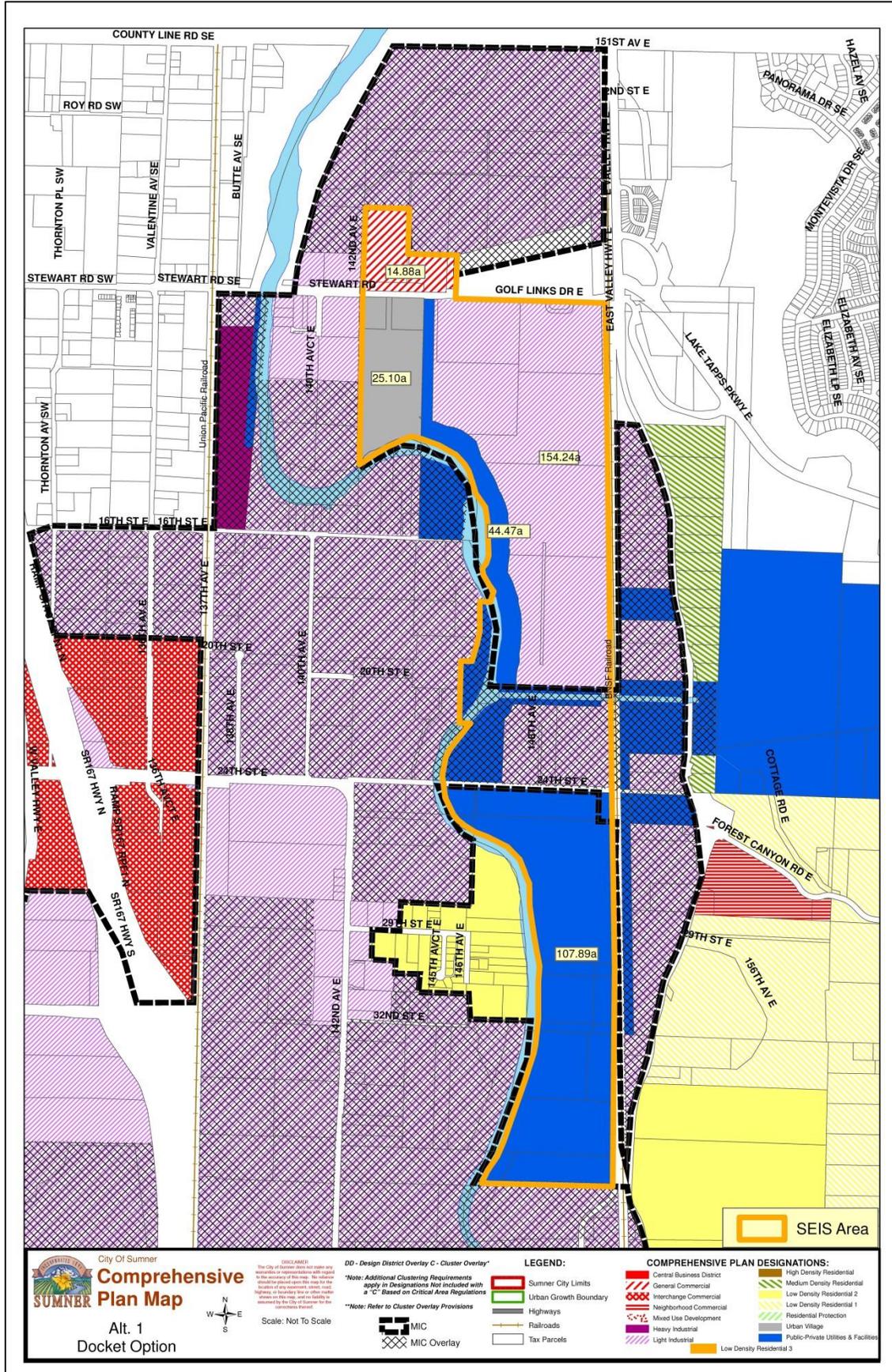
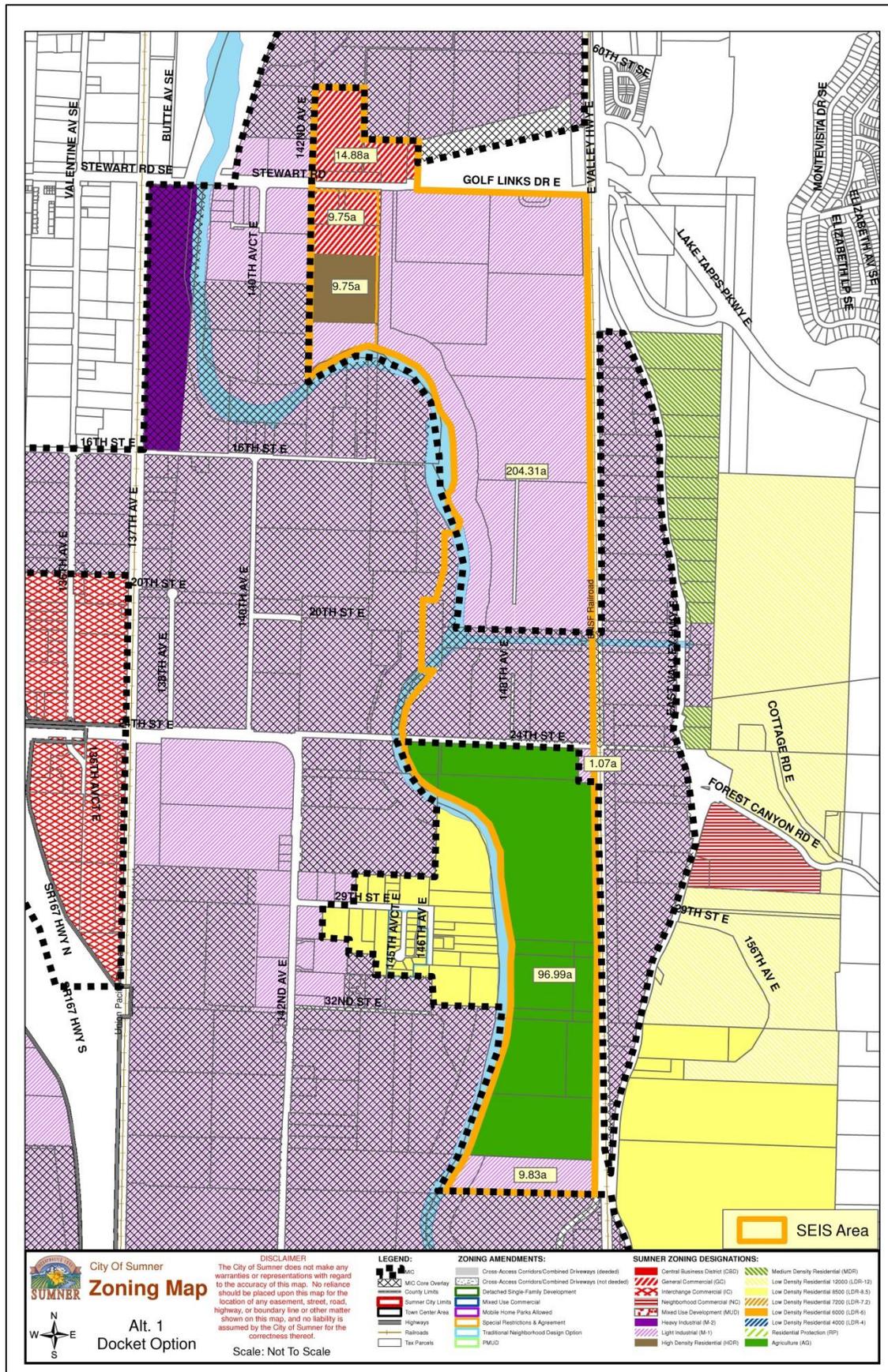


Exhibit 2-4. Alternative 1 Sumner Meadows Docket Application – Zoning Map



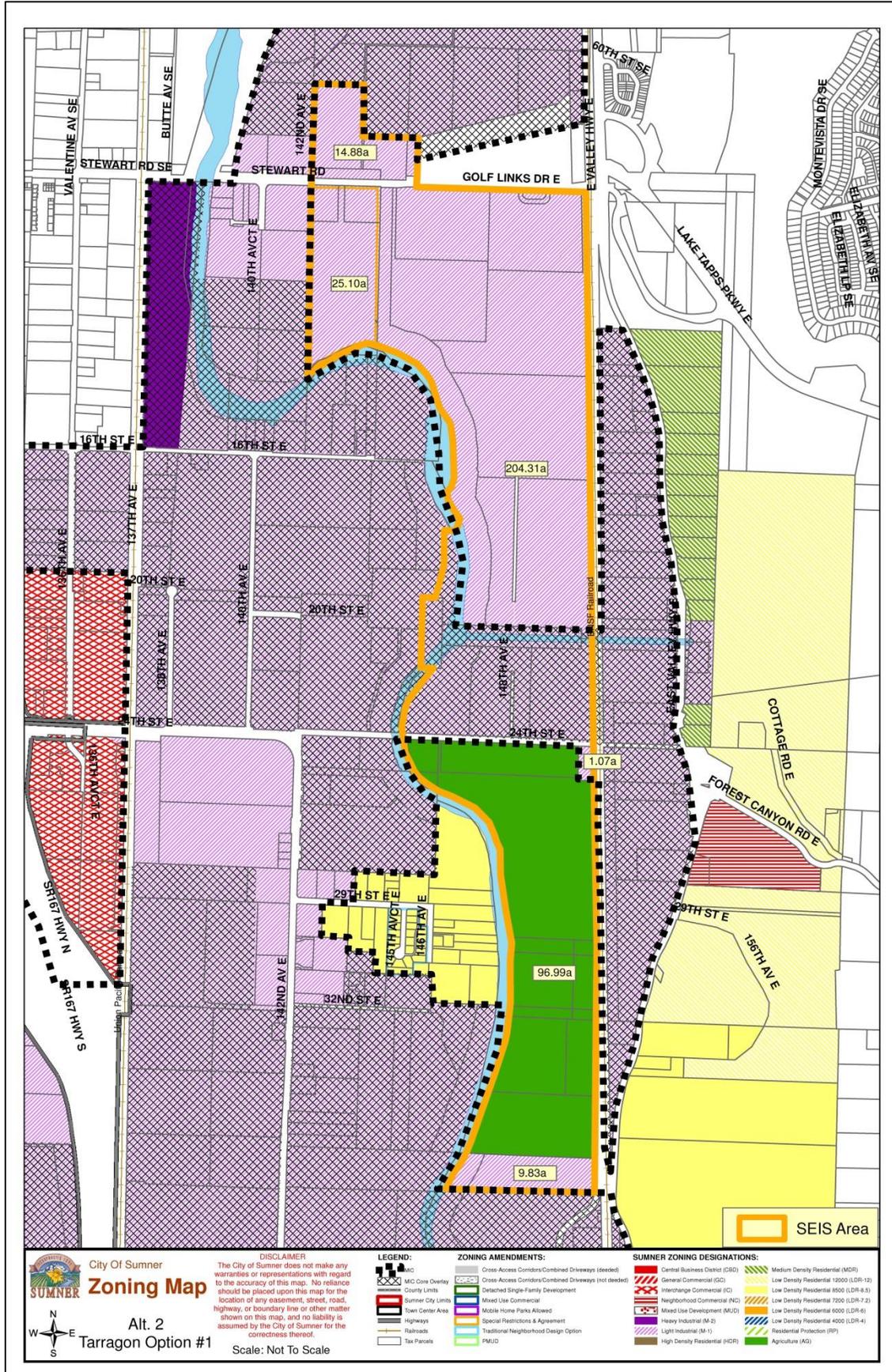
***Alternative 2 Areawide Industrial Alternative***

This alternative is an extension of docket application MA-1 (Alternative 1) beyond Sumner Meadows Golf Course to include an areawide redesignation of private vacant lands north and south of Stewart Road east of the White (Stuck) River. Alternative 2 would amend the Comprehensive Plan land use map to apply Light Manufacturing in place of General Commercial, Urban Village, and Public-Private Utilities and Facilities. Implementing zoning would be Light Industrial M-1. Other text amendments TA-1 and TA-2 would be implemented similar to Alternative 1. M-1 Zoning Changes to reduce greenhouse gas emissions would also be implemented.

Under this alternative the employment capacity (3,523) provided by the change in designation of the golf course would remain and there would be some job growth in the study area on the north and south side of Stewart Road under M-1 designations (about 229 jobs) for a total job capacity of 3,752. However, when compared to the No Action Alternative, the shift of the private parcels north and south of Stewart Road from General Commercial (GC) and High Density Residential (HDR) to Light Industrial (M-1) would result in a decrease in housing and population capacity (39 units and 86 population respectively) on those properties. This alternative would also result in a net decrease of employment capacity by 106 jobs. The proposed map changes are shown in Exhibit 2-5 and Exhibit 2-6. Resulting changes to projected population and employment estimates are shown in Exhibit 2-13.



Exhibit 2-6. Alternative 2 Areawide Industrial – Zoning Map



***Alternative 3 Areawide Industrial and Residential Alternative***

This areawide alternative would reclassify private properties north of Stewart Road and east of the White (Stuck) River and the Sumner Meadows Golf Course as Light Manufacturing (Exhibit 2-7). Implementing zoning would be Light Industrial (M-1) (Exhibit 2-8. Property west of Sumner Meadows Golf Course owned by Six Kilns Apartments LLC would be designated as Urban Village and zoned as High Density Residential (HDR).<sup>2</sup> Other text amendments TA-1 and TA-2 would be implemented similar to Alternative 1. M-1 Zoning Changes to reduce greenhouse gas emissions would also be implemented.

Similar to Alternative 2, this alternative would include the redesignation of the golf course from Public-Private Utilities and Facilities to Light Manufacturing. As described above, the same increase in employment capacity (3,523 jobs) would occur on the golf course property. The designation on the private properties north and south of Stewart Road would alter housing and employment capacities from Alternative 2 including 127 less jobs, 450 additional dwellings, and 990 additional persons. See Exhibit 2-13.

Compared to the No Action Alternative, this alternative would reduce employment capacity on the private properties by 139 jobs. Housing capacity would be increased by net 436 units (and net 959 population) because of the increase in housing options and density under the development agreement and HDR zoning.

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<sup>2</sup> This alternatives is based on received scoping comments, but recognizes a development agreement between Six Kilns Apartments LLC and City in 2009. An amendment to the agreement for 1) Zoning Map amendments and 2) Zoning Text Amendment to allow for up to 450 apartments is before the City Council

Exhibit 2-7. Alternative 3 Areawide Industrial and Residential – Comprehensive Plan Map

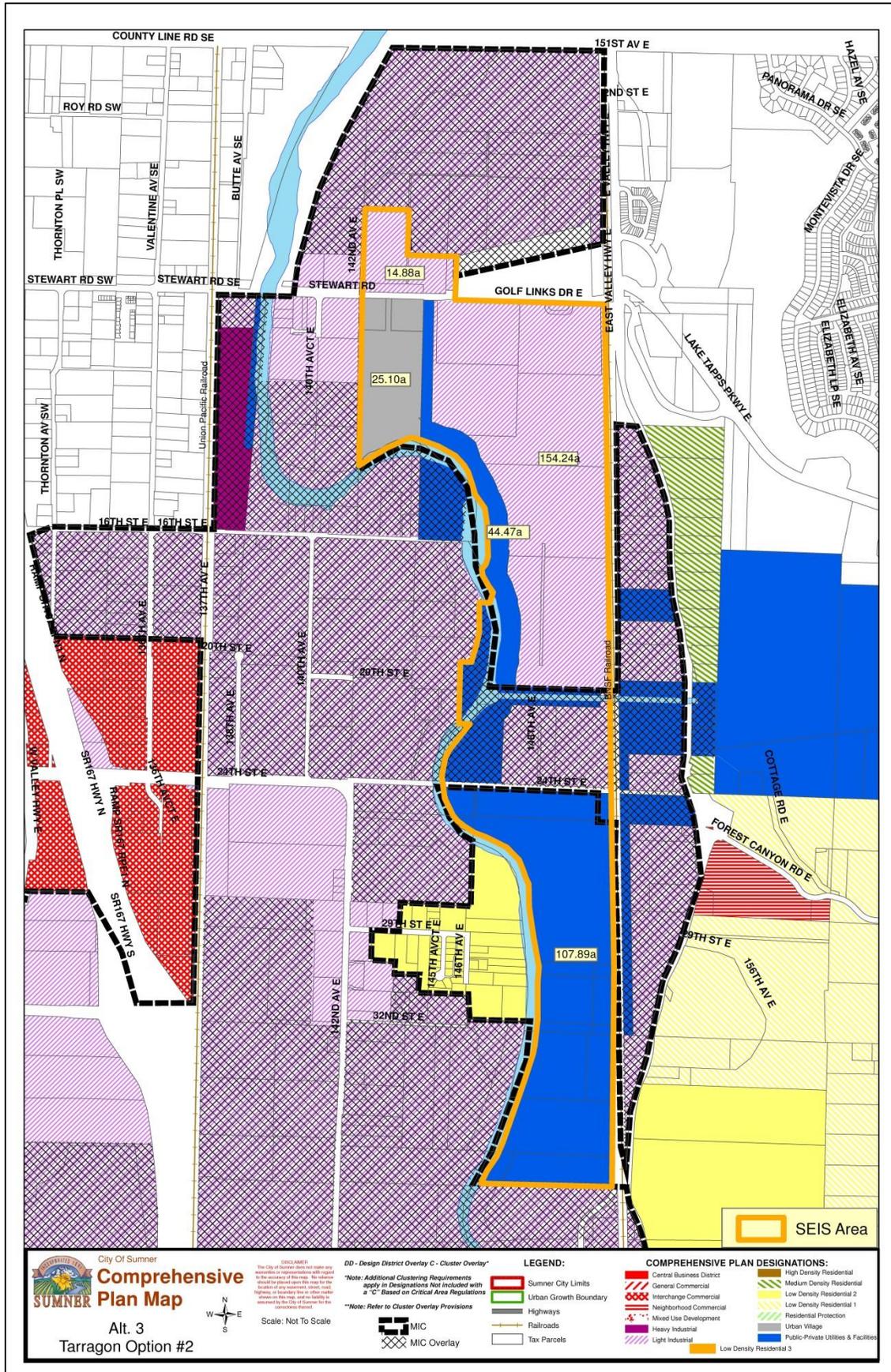
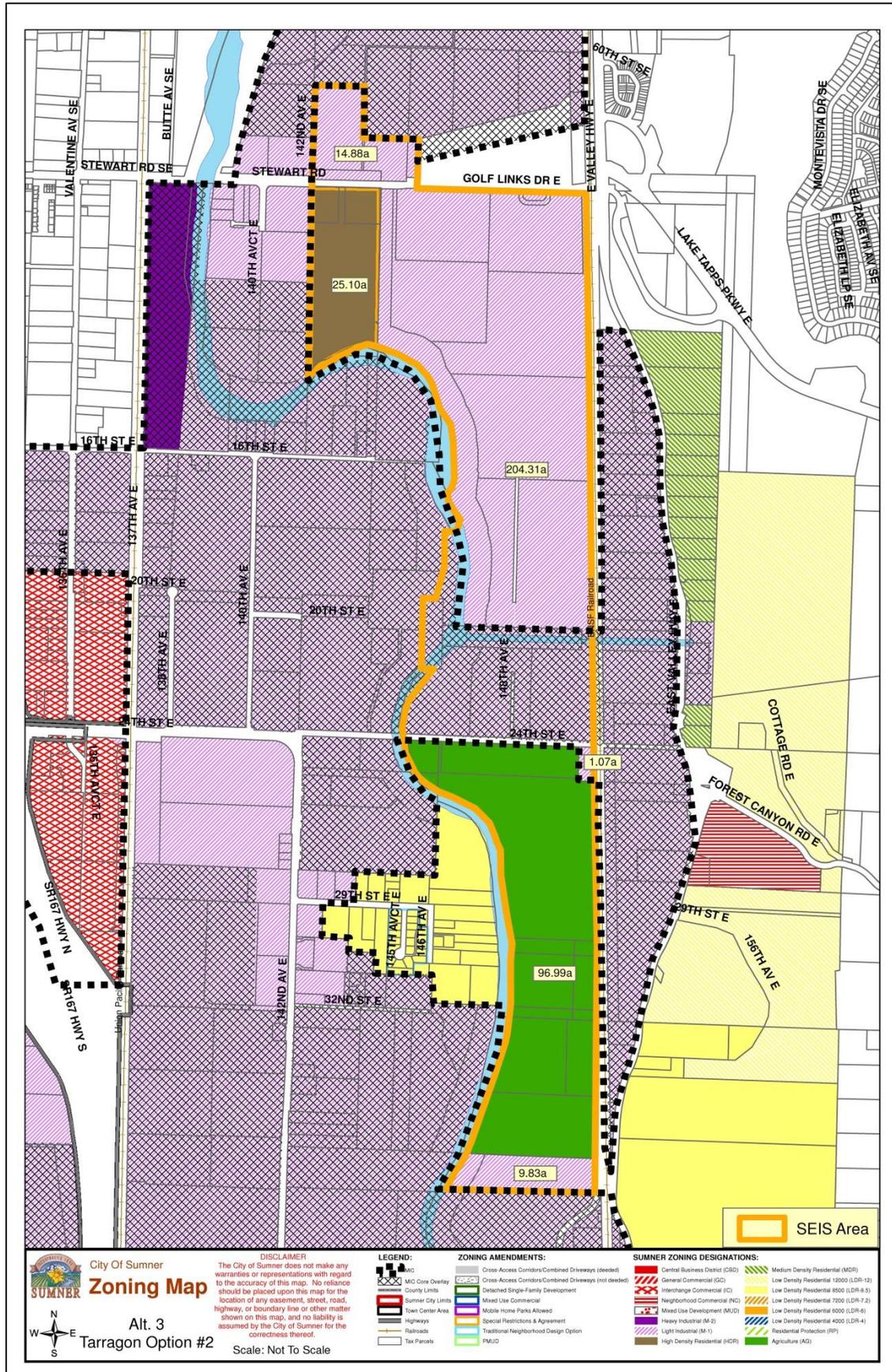


Exhibit 2-8. Alternative 3 Areawide Industrial and Residential – Zoning Map



***Alternative 4 Offsite Alternative***

Alternative 4 proposes to retain the current Comprehensive Plan and zoning designations on the Sumner Meadows Golf Course and private properties addressed in Alternatives 2 and 3. Instead City-owned property designated in the Comprehensive Plan as Public-Private Utilities and Facilities and zoned Agriculture (AG) would be redesignated Light Manufacturing and rezoned as Light Industrial (M-1). See Exhibit 2-9 and Exhibit 2-10.

This Comprehensive Plan map amendment would require text amendments to the various elements identified in Docket Applications TA-1 and TA-2 except that the focus would be on attaining consistency with regard to this Light Industrial/AG property instead of the Sumner Meadows Golf Course. M-1 Zoning Changes to reduce greenhouse gas emissions would also be implemented.

Under this alternative, the offsite property would shift to M-1. No new housing capacity would be added to the City. The new designation and zoning would add employment capacity of 302 jobs as compared to No Action Alternative. See Exhibit 2-13.

Exhibit 2-9. Alternative 4 Offsite Alternative – Comprehensive Plan Map

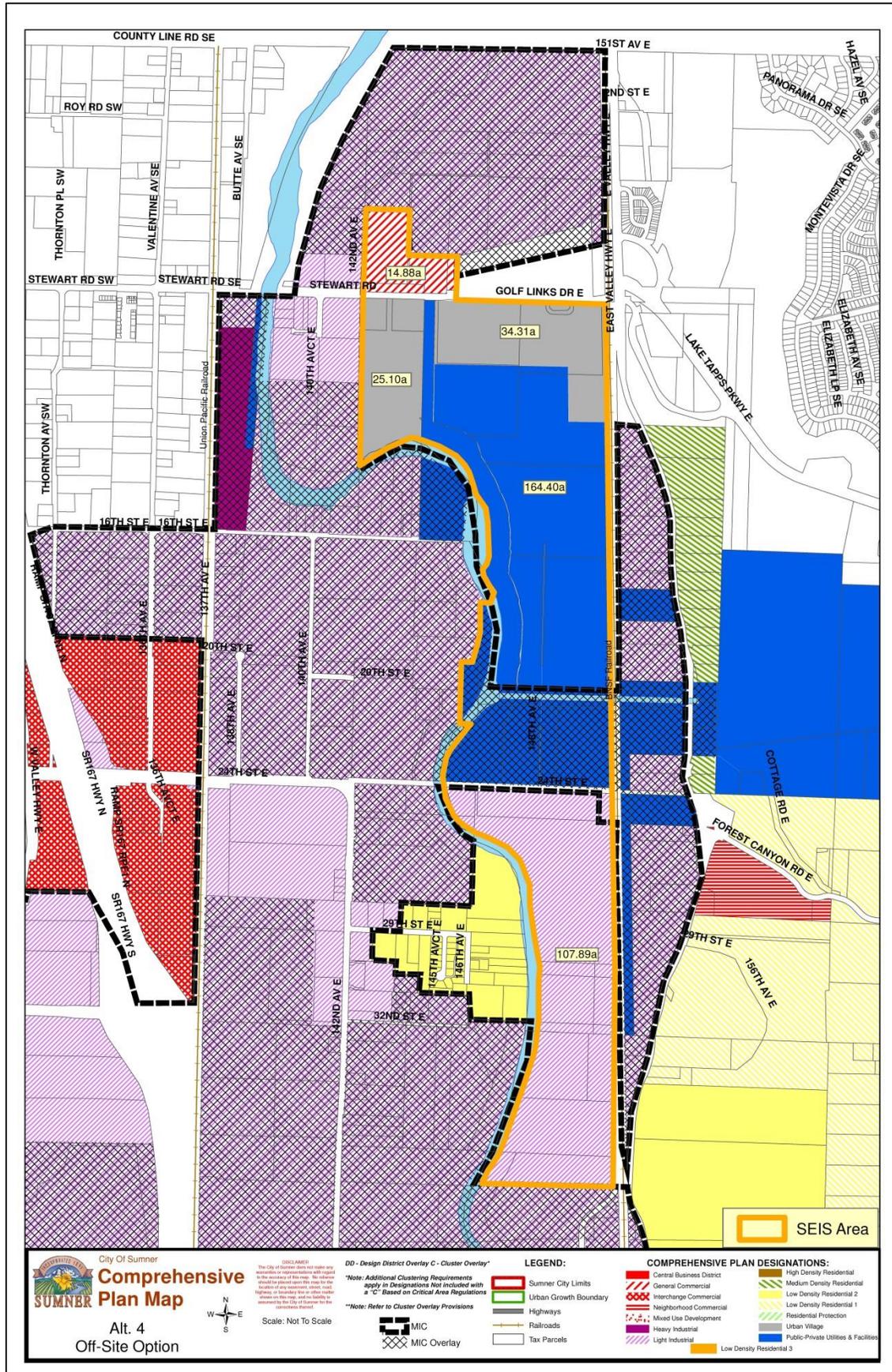
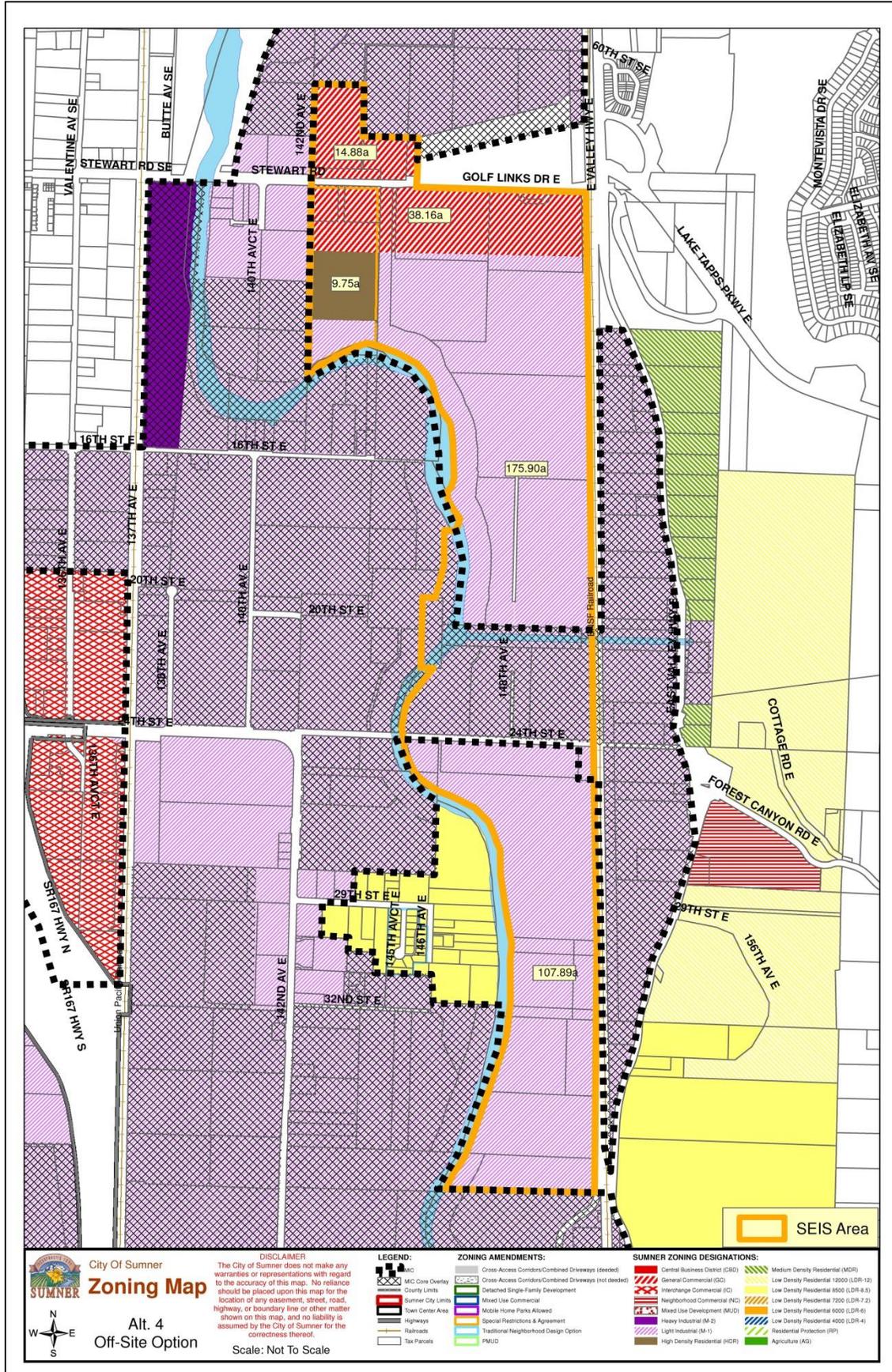


Exhibit 2-10. Alternative 4 Offsite Alternative – Zoning Map

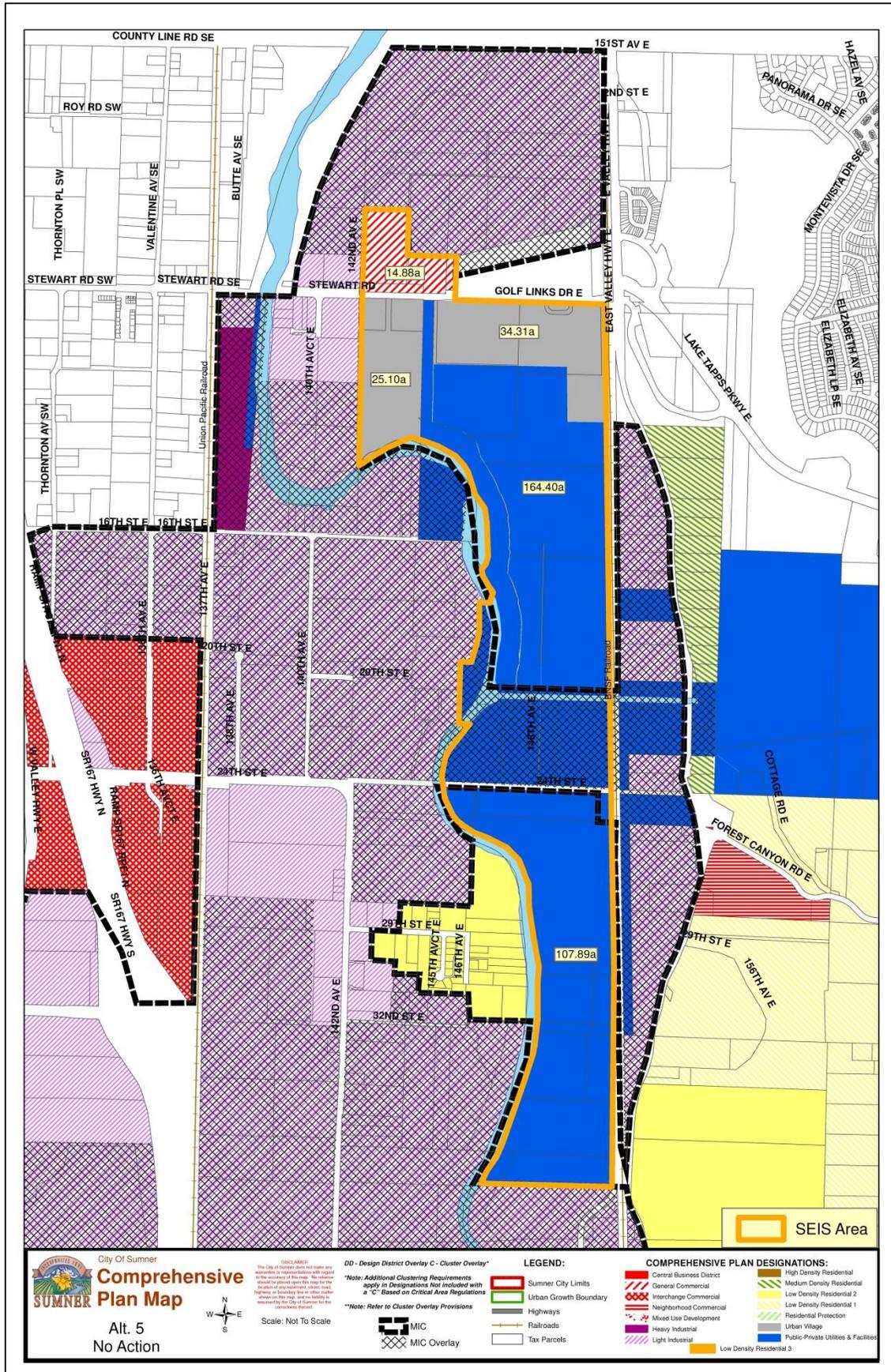


***No Action Alternative (Alternative 5)***

This alternative represents the continuation of the City's current Growth Management Act (GMA) Comprehensive Plan that includes a planning period extending to the year 2030. The No Action Alternative is a SEPA-required alternative. With the No Action Alternative, General Commercial, Urban Village, and Public and Private Utilities and Facilities land use map designations would be retained in the Comprehensive Plan. See Exhibit 2-11.

Corresponding General Commercial (GC), Light Industrial (M-1), and High Density Residential (HDR) zoning districts would be retained. No Comprehensive Plan text amendments would be made. See Exhibit 2-12. Estimated housing and employment capacities would remain unchanged. See Exhibit 2-13.

Exhibit 2-11. No Action Alternative 5 – Current Comprehensive Plan Map





### 2.4.3 Comparison of Alternatives

Each Alternative is compared below in terms of growth capacity. Alternative 2 has the highest employment capacity and Alternative 4 the least. Alternative 3 provides the most residential and housing capacity. See Exhibit 2-13.

**Exhibit 2-13. Comparison of Alternative Population, Housing, and Employment**

Scenario/Alternative	Gross Acreage – Comp Plan Map	Total Population 2030	Total Housing 2030	Total Jobs 2030
<b>Action Alternatives</b>				
Alternative 1 Sumner Meadows Docket Application*	154.24	-	-	3,523
Alternative 2 Areawide Industrial Alternative*	194.22	-	-	3,752
Alternative 3 Areawide Industrial and Residential Alternative*	194.22	990	450	3,651
Alternative 4 Offsite Alternative	107.89	-	-	302
<b>No Action Alternative</b>				
Alternative 5 No Action Alternative (Golf Course)	154.24	-	-	160
Alternative 5 No Action Alternative (Areawide Stewart Road)	194.22	86	39	495
Alternative 5 No Action Alternative (AG property Offsite)	107.89	-	-	-
<b>Sumner City Limits</b>	<b>5,394</b>	<b>11,879</b>	<b>5,281</b>	<b>19,958</b>

Note: \*Excludes lands to be reserved as Public and Private Utilities and Facilities along the river.

Source: City of Sumner GIS, 2014.

### 2.4.4 Cumulative Growth Assumptions

This Sumner Meadows Docket SEIS reviews the Docket and Alternatives in the context of cumulative growth. For topics that rely on cumulative analysis, such as air quality, transportation, and plans and policies (growth target evaluation), growth for the whole Sumner Planning Area is assumed (City and UGA). Since the Sumner Meadows Docket SEIS scoping was initiated in fall 2013, the City has withdrawn its court appeal of the Orton Junction UGA boundary expansion and East Hill UGA retraction originally approved by the City and County but denied by the Growth Management Hearings Board. Formal City Council action is pending County action. Further, the 2011 SEIS for the Fleishmann property reviewed mixed use and industrial alternatives; in early 2014 a development application has proposed industrial uses.

For the cumulative topics, the following assumptions were made:

- **Air Quality:** Growth with and without Orton Junction UGA and Fleishmann property mixed use assumptions is addressed in Section 3.2 of this SEIS. This SEIS focuses difference between Sumner Meadows Docket alternatives assuming Orton Junction UGA expansion is not occurring and that the Fleishmann property is industrial. The prior EISs in 2010 and 2011 compare different UGA and alternatives and Fleishmann property alternatives and may be reviewed for on an order of magnitude differences.

- **Transportation:** The model assumes Orton Junction UGA is in place and the Fleishmann property develops as mixed use. However, the transportation analysis in the Final EIS for the City of Sumner Comprehensive Plan Update and Amendments issued on November 24, 2010 compares growth with and without the Orton Junction UGA expansion and East Hill UGA retraction; results show very little change in volumes in the Sumner Meadows Docket SEIS study area vicinity, given the distance of the subareas from one another and the type of land use and travel characteristics. Further, the Fleishmann's Industrial Park, LLC Manufacturing/Industrial Center (MIC) Overlay Expansion Final SEIS issued on February 29, 2012 addresses mixed use and industrial alternatives and show no difference in levels of service based on the alternatives.
- **Plans and Policies:** Growth capacity in the Sumner Planning Area with and without the Orton Junction UGA and Fleishmann property mixed use assumptions is addressed. Section 3.6 assumes Orton Junction UGA expansion is not occurring and that the Fleishmann property is industrial, but Appendix B shows the results if Orton Junction is included and Fleishmann property is mixed use.

## 2.5 Benefits and Disadvantages of Delaying the Proposal

SEPA requires a discussion of the benefits and disadvantages of reserving, for some future time, the implementation of a proposal compared to possible approval at this time. In other words, the City must consider the possibility of foreclosing future options by implementing the proposal. Adopting proposed comprehensive plan and zoning amendments may have several benefits:

- The surplus Sumner Meadows Golf Course, as approved by the City Council, could be sold.
- Establish a long-term and consistent land use pattern along Stewart Road and the White (Stuck) River.
- Accommodate the City's fair share of population and employment forecasts to meet GMA requirements and the City vision.
- Implement flood mitigation planned for Alternatives 1-3, the golf course development consistent with City transportation and shoreline plans.

Delaying implementation of the proposal could alter the agreement between the City and potential Golf Course buyer. A delay may also result in a delay in development on neighboring parcels as developers wait for conformation of what long term land use will be.

## 2.6 Alternatives Previously Considered

In selecting an Offsite Alternative, the City considered a variety of properties for employment designation and capacity. See Appendix C.

## 2.7 Major Issues to be Resolved

Major issues to be resolved are the policy choices of allowing potential future development on the Sumner Meadows Golf Course property fully under the M-1 zone as well as the policy choices of whether to increase the City's total area under M-1 or HDR on the adjacent private properties. These policy choices will affect the City's population and jobs capacity and consistency with its growth targets in the long-term.

## 3.0 AFFECTED ENVIRONMENT, SIGNIFICANT IMPACTS, AND MITIGATION MEASURES

### 3.1 Earth

This section discusses the topography and soils in the vicinity of the Sumner Meadows Golf Course. It also considers the presence and potential impacts of geological hazards on future development. The section is based on the geotechnical evaluation prepared by PanGeo in February, 2013. See Appendix D of this SEIS.

That report considered areawide and project level geotechnical reports considered representative of the Sumner Meadows Golf Course vicinity. These studies included: Summary boring logs for Lake Tapps Parkway East Phase 4 (1998), White (Stuck) River Pedestrian Bridge Geotechnical Report (2013), and general studies of mudflows and liquefaction for the White (Stuck) River valley by the Washington Division of Geology and Earth Resources (1994 and 1995). Programmatic analysis conducted for previous Comprehensive Plan amendments is also considered (City of Sumner 2010).

#### 3.1.1 Affected Environment

The study area is located in a broad and flat valley, at an elevation of nearly 60 feet. There are approximately 150 to 200 feet of sand, gravel alluvium, and silt beneath the surface. Previous subsurface explorations in nearby soils revealed a sequence of loose to medium dense sand and soft to medium stiff silt and clay. In addition, peat layers of various thicknesses (including a seven-foot thick layer) were also discovered nearby. Since peat is vulnerable to secondary deposits, additional subsurface explorations will be required prior to future development approvals to ensure the soil is suitable for the specific needs of any planned development.

Nearby borings also indicated that there was a groundwater level of five- to-eight feet at the time of drilling, although these levels are affected by seasonal fluctuations in precipitation and the level of the nearby White (Stuck) River. Shallow groundwater should be expected in the study area during heavy precipitation periods during the winter and spring.

The study area is located in a volcanic hazard area. The White and Puyallup River valleys are in the potential path of debris flows from Mount Rainier if an eruption occurs. In addition, like most of the valley floor in Sumner, the study area is located in a seismic hazard area. Previous analysis has suggested that there is a high risk for earthquake-induced dynamic settlement and liquefaction at the site, based on the presence of loose, silty sand and a shallow water table underneath the study area.

#### 3.1.2 Impacts

##### ***Impacts Common to All Action Alternatives***

Under all Action Alternatives, an increase in development would be expected, potentially including buildings, parking areas, and driveways. All new development would be within a volcanic and seismic hazard zone, and structures would face a greater risk of damage. In addition, individuals living in the area under some Action Alternatives would face a greater risk to health and safety.

##### ***Alternative 1 Sumner Meadows Docket Application***

Under Alternative 1 the land use designation of Public and Private Utilities and Facilities would be changed to Light Manufacturing. The Light Industrial Zone (M-1) would be expanded and the General Commercial Zone removed. This change in designation along with the proposed changes to Comprehensive Plan text would likely result in new light industrial development on the golf course. Impacts related to earth are the same as those described in the Impacts Common to All Alternatives section above. Since this alternative allows only industrial development, no residences would be exposed to the geologic hazards in the study area.

***Alternative 2 Areawide Industrial Alternative***

Similar to Alternative 1, the golf course would likely develop with light industrial uses; the potential for impacts under this alternative on the golf course property would be the same as those described in Alternative 1. Under Alternative 2, the private properties north and south of Stewart Road would be redesignated Light Manufacturing and rezoned to allow for Light Industrial uses resulting in greater employment to be located in the area in place of mixed use and commercial designations.

***Alternative 3 Areawide Industrial and Residential Alternative***

Under Alternative 3 the private properties north of Stewart Road would be redesignated as Light manufacturing and the private property south of Stewart Road would be redesignated as High Density Residential. The potential for impacts under this alternative on the golf course property would be similar to those described in Alternative 1. Since the current designations of Urban Village and General Commercial on those properties allows for relatively high intensity development, no additional impacts to earth resources would be anticipated. However, it is noteworthy that because residential development would be allowed in the area south of Stewart Road, residences as well as industrial developments would be subject to the geologic hazards in the study area.

***Alternative 4 Offsite Alternative***

Under Alternative 4, the current Comprehensive Plan and zoning designations on the Sumner Meadows Golf Course and private properties addressed in Alternatives 2 and 3 would be retained. However, City-owned property south of the study area, which is currently designated as Public and Private Utilities and Facilities and zoned Agriculture, would be redesignated Light Manufacturing and rezoned to allow for Light Industrial uses. An increase in development would be expected in this area, and the impacts related to earth resources would be the same as those described in the Impacts Common to All Alternatives section above.

***Alternative 5 No Action Alternative***

Under this alternative, no Comprehensive Plan text or map changes would be made and no zoning would be altered. However, growth could still occur on the private lands north and south of Stewart Road. The current designations of Urban Village and General Commercial in the properties north and south of Stewart Road allow for relatively high intensity development, and they also allow the possibility of mixed use residential uses.

**3.1.3 Mitigation Measures**

***Incorporated Plan Features***

None.

***Applicable Regulations and Commitments***

- The City has adopted the International Building Code (SMC 15.08.010) and a City Erosion Control Ordinance (SMC 16.05) to reduce the impacts caused by earthquakes, soil instability, and erosion.
- The City is a member of the Pierce County Emergency Management System and has adopted an emergency management ordinance for the reduction of risk from situations like earthquakes and volcanic eruptions or mudflows.
- The City will continue to enforce critical areas regulations pertaining to floodplains (SMC 16.58).
- The City will pursue implementation of mitigation measures outlined in the Pierce County Natural Hazard Mitigation Plan (Pierce County 2009).
- The City has adopted a critical areas ordinance that provides limitations on certain types of development; noticing and reporting requirements for development within volcanic hazard areas, and seismic hazard areas (SMC 16.52 and 16.54).

***Other Potential Mitigation Measures***

- The geotechnical evaluation prepared by PanGeo in February, 2013 (Appendix D) indicates likely future conditions of approval for future development allowed under Action Alternatives. These measures include pre-loading, foundation and footing system design considerations, parking area asphalt design, and compliance with the International Building Code standards, among other requirements and considerations.

**3.1.4 Significant Unavoidable Adverse Impacts**

Application of mitigation measures will reduce potential adverse impacts of new development on earth resources. Because the study area is in a seismic and volcanic geologic hazard area, development in the area poses an increased risk to structures and to the people living or working in the area. Alternatives 3 and 5 would increase the number of residents subject to the risk. Alternatives 1, 2 and 3 have substantially higher employment capacities. This could increase the daytime population at risk in the area. However, all of the alternatives, including the No Action Alternative are likely to result in additional employment uses where employees could be at risk.

## 3.2 Air Quality

This section describes the current air quality conditions in the region, existing regulations and policies that govern allowable air pollutant emissions, and existing regulations and policies that have been developed to reduce greenhouse gas (GHG) emissions. Impacts of the alternatives (Alternative 1 – Sumner Meadows Docket Application, Alternative 2 – Areawide Industrial Alternative, Alternative 3 – Areawide Industrial and Residential Alternative, Alternative 4 – Offsite Alternative, and Alternative 5 – No Action Alternative) are analyzed at a programmatic level. This section also provides a screening-level forecast of GHG emission rates that would be generated by the alternatives.

The study area includes the city limits and Sumner Urban Growth Area. Current air quality regulations would prevent new developments and commercial and industrial facilities within the study area from generating unacceptable air pollutant emissions that would affect nearby areas during construction or operation. Because all of the alternatives would increase population, commercial space, and industrial space in the study area above existing conditions, the air pollutant emissions generated within the study area are expected to increase. Similarly, regional vehicle miles traveled (VMT) by vehicles used by residents and those who work in the study area would also increase, along with the tailpipe emissions generated by those vehicles. However, the VMT generated by the new homes and businesses in the study area would be a small fraction of the overall VMT generated within Puget Sound, so it is unlikely that any of the alternatives would significantly affect regional air quality.

### 3.2.1 Affected Environment

#### *Existing Air Pollution Sources*

Typical air pollution sources in the study area include vehicular traffic along major roadways, and within the industrial, commercial, and residential areas surrounding the study area, commercial and industrial businesses, and residential wood-burning devices. While many types of pollutant sources are present, the single largest contributor to most criteria pollutant emissions is expected to be derived from on-road vehicles, which contribute most of the carbon monoxide (CO), volatile organic compounds (VOCs), and nitrogen dioxide (NO<sub>2</sub>). Secondary sources of emissions include stationary equipment operated for commercial and industrial land uses. Additionally, space heating (e.g., gas and diesel heating equipment) and wood-burning appliance emissions contribute to background air quality.

#### *Key Criteria Air Pollutants*

The following paragraphs describe the sources and environmental effect of key criteria pollutants (CO, ozone, and particulate matter) considered in this analysis.

CO is a product of incomplete combustion generated by mobile sources, residential wood combustion, and industrial fuel-burning sources. CO is a concern related to on-road mobile sources because it is the pollutant emitted in the greatest quantity for which short-term health standards exist. CO is a pollutant whose impact is usually localized, and CO concentrations typically diminish within a short distance of roads. The highest ambient concentrations of CO usually occur near congested roadways and intersections during wintertime periods of air stagnation.

Ozone is a highly reactive form of oxygen created by an atmospheric chemical reaction of nitrogen oxides and VOCs, both of which are emitted directly from industrial and mobile sources. Ozone problems tend to be regional in nature because the atmospheric chemical reactions that produce ozone occur over a period of time, and because, during the delay between emission and ozone formation, ozone precursors can be transported far from their sources. Transportation sources like automobiles and trucks are some of the sources that produce ozone precursors.

Particulate matter is generated by industrial emissions, residential wood combustion, motor vehicle tailpipes, and fugitive dust from roadways, haul roads, and unpaved surfaces. When first regulated, particle pollution was based

on “total suspended particulates,” which included all size fractions. As sampling technology has improved and the importance of particle size and chemical composition has become clearer, ambient standards have been revised to focus on the size fractions thought to be most dangerous to people. Currently, there are standards for particulate matter less than or equal to 10 micrometers in size (PM<sub>10</sub>) and particulate matter less than or equal to 2.5 micrometers in size (PM<sub>2.5</sub>), because these sizes of particulate matter contribute the most to human health effects, regional haze, and acid deposition. The highest ambient concentrations generally occur near the emissions sources, which in the study area would be from motor vehicle tailpipes from major roads. PM<sub>2.5</sub> has a greater impact than PM<sub>10</sub> at locations far from the emitting source because it remains suspended in the atmosphere longer and travels farther.

### ***Air Quality Attainment Status***

Based on monitoring information collected over a period of years, the U.S. Environmental Protection Agency (EPA) and Washington State Department of Ecology (Ecology) designate regions as being attainment or non-attainment areas for regulated air pollutants. Attainment status indicates that air quality in an area meets the National Ambient Air Quality Standards (NAAQS), and non-attainment status indicates that air quality in an area does not meet those standards. If the measured concentrations in a non-attainment area improve so they are consistently below the NAAQS, Ecology and the EPA can reclassify the non-attainment area to a maintenance area.

Sumner, including the study area, is currently designated as a maintenance area for CO and an attainment area for all other criteria air pollutants [PM<sub>10</sub>, PM<sub>2.5</sub>, lead, sulfur dioxide (SO<sub>2</sub>), and NO<sub>2</sub>]. In March 2008, the EPA lowered its 8-hour ozone standard from 0.08 parts per million (ppm) to 0.075 ppm to better protect public health. In January 2010, the EPA proposed a revision to the 2008 ozone standard, and put all area designations to the 2008 standard on hold. Until the revised standard is adopted, the region is still designated an attainment area for ozone.

Similarly, in 2010 the EPA enacted a new, more stringent 1-hour average ambient air quality standard for NO<sub>2</sub>. At this time it is not known which regions in the country will be redesignated based on the new standard. Therefore, as of this time, Sumner is still considered an attainment area for NO<sub>2</sub>.

### ***Air Toxics Issues***

The study area includes residential, commercial, and industrial uses that pose no special issues related to air toxics. The study area is not near any major industrial facilities that emit large amounts of toxic air pollutants. Heavy diesel trucks traveling along major roadways have the potential to emit toxic air pollutants. It is expected that existing and future air quality in the study area adjacent to major roadways could be affected by minor to moderate concentrations of toxic air pollutants.

According to the EPA’s National Air Toxics Assessment (NATA) 2005 database, the existing respiratory cancer risk in the census tracts that include the study area is roughly  $47 \times 10^{-6}$  or 47 cancer cases per million population (EPA website 2014). This reported respiratory cancer risk is typical of other developed suburban areas in Washington State.

### ***Puget Sound Regional Council Transportation Conformity Analysis***

Under federal and state regulations, the Puget Sound Regional Council (PSRC) is required to demonstrate that the Regional Transportation Plan (RTP) or Transportation Improvement Program (TIP) conforms to the State Implementation Plan (SIP) allowable emissions budget. The SIP provides a blueprint of how maintenance and non-attainment areas such as the central Puget Sound region will meet or maintain the NAAQS. The most recent air quality analysis (PSRC website 2014) for the 2013–2016 Regional TIP and the long-range RTP demonstrates that 2040 forecast regional emissions conform to the SIP’s allowable emissions budgets.

### ***National Ambient Air Quality Standards***

The EPA established the NAAQS, and specifies future dates for states to develop and implement plans to achieve these standards. The standards are divided into primary and secondary standards; the former are set to protect

human health within an adequate margin of safety, and the latter to protect environmental values, such as plant and animal life. Ecology established the Washington State Ambient Air Quality Standards (WAAQS) for the same six criteria air pollutants that are at least as stringent as the national standards; in the case of SO<sub>2</sub>, state standards are more stringent. Exhibit 3-1 lists the NAAQS for six criteria pollutants: CO, ozone, PM<sub>10</sub>, PM<sub>2.5</sub>, lead, SO<sub>2</sub>, and NO<sub>2</sub>.

**Exhibit 3-1. National and Washington State Ambient Air Quality Standards**

Pollutant	Federal		State
	Primary	Secondary	
Carbon monoxide			
8-hour average <sup>a</sup>	9 ppm	No standard	9 ppm
1-hour average <sup>a</sup>	35 ppm	No standard	35 ppm
Ozone			
8-hour average <sup>b</sup>	0.075 ppm	0.075 ppm	0.075 ppm
Total suspended particles			
Annual average	No standard	No standard	60 µg/m <sup>3</sup>
24-hour average <sup>c</sup>	No standard	No standard	150 µg/m <sup>3</sup>
Particulate matter—PM <sub>10</sub>			
24-hour average <sup>c</sup>	150 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>
Particulate matter—PM <sub>2.5</sub>			
Annual average	15 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>
24-hour average <sup>d</sup>	35 µg/m <sup>3</sup>	35 µg/m <sup>3</sup>	35 µg/m <sup>3</sup>
Lead			
Quarterly average	1.5 µg/m <sup>3</sup>	1.5 µg/m <sup>3</sup>	1.5 µg/m <sup>3</sup>
Sulfur dioxide			
Annual average	0.03 ppm	No standard	0.02 ppm
24-hour average <sup>a</sup>	0.14 ppm	No standard	0.10 ppm
3-hour average <sup>a</sup>	No standard	0.50 ppm	No standard
1-hour average <sup>e</sup>	No standard	No standard	0.40 ppm
Nitrogen dioxide			
Annual average	0.053 ppm	0.053 ppm	0.05 ppm
1-hour average <sup>f</sup>	0.100 ppm	No standard	No standard

Source: Washington Administrative Code (WAC) 173-470–475.

ppm = parts per million; µg/m<sup>3</sup> = micrograms per cubic meter

Notes:

Annual standards are never to be exceeded. Short-term standards are not to be exceeded more than once per year unless noted.

<sup>a</sup> Not to be exceeded once per year.

<sup>b</sup> To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.075 ppm (effective May 27, 2008).

<sup>c</sup> Not to be exceeded more than once per year on average over 3 years.

<sup>d</sup> To attain this standard, the 3-year average of the 98th percentile of 24-hour concentrations at each population-oriented monitor within an area must not exceed 35 µg/m<sup>3</sup>.

<sup>e</sup> 0.25 ppm are not to be exceeded more than two times in 7 consecutive days.

<sup>f</sup> To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm.

***Transportation Conformity Regulations***

Regionally significant transportation projects (with federal or state funding) proposed for construction within non-attainment areas or maintenance areas are subject to the transportation conformity regulations specified under federal regulations (Code of Federal Regulations, Title 40, Parts 51 and 93) and state regulations [Chapters 173-420 of the Washington Administrative Code (WAC)]. Regionally significant projects include constructing or widening new roadways and widening signalized intersections. The intent of these regulations is to ensure that transportation projects, plans, and programs affecting regional and local air quality will conform to existing plans and timetables for attaining and maintaining federal health-based air quality standards. The permitting agency must demonstrate transportation conformity by the following steps for any proposed future roadway improvement projects.

- Confirm that the proposed projects are included in the RTP or TIP.
- Confirm that the regional emissions described in the TIP are within the allowable emissions budget specified by Ecology.
- Use an EPA-approved air quality dispersion model to conduct a project-level CO hotspot analysis at the most heavily congested intersections.

Inclusion of a project in PSRC's regional conformity analysis does not satisfy project-level conformity requirements. Project-level hotspot analyses must be performed by the project sponsor as part of the project's environmental review process.

Currently for this programmatic evaluation, it is unclear whether the City of Sumner (City) would request state and federal transportation funding to support new roadway and intersection improvements required for the proposed development. However, if the City used state or federal funds to construct any roadway improvements, then it would be required to include the preceding air quality demonstrations in Washington State Environmental Policy Act (SEPA) and/or National Environmental Policy Act (NEPA) documentation.

***National Environmental Policy Act Requirement for Climate Change Analysis***

Compliance with NEPA is required when a project receives federal funding or a federal permit; neither situation is the case with the programmatic land use and zoning changes for the proposal and alternatives. However, future development under the City's plans and regulations and potential capital projects may be subject to NEPA review. In such cases NEPA guidance on planning for climate change may be a consideration. Further, the guidance can provide some methods of analysis the city could consider.

On December 7, 2009, the EPA signed the Endangerment and Cause or Contribute findings for GHGs under Section 202(a) of the Clean Air Act. Under the Endangerment Finding, the EPA determines that the current and projected concentrations of the six key well-mixed GHGs—carbon dioxide (CO<sub>2</sub>), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations. Under the Cause or Contribute Finding, the EPA determines that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG emissions that threaten public health and welfare.

On February 19, 2010, the Council on Environmental Quality issued a draft NEPA guidance document on the consideration of the effects of climate change and GHG emissions. This guidance document advises federal agencies to consider opportunities to reduce GHG emissions caused by federal actions, adapt their actions to climate change impacts throughout the NEPA process, and address these issues in their agency NEPA procedures. Where applicable, the scope of the NEPA analysis should cover the GHG emission effects of a proposed action and alternatives, and the relationship of climate change effects to a proposed action or alternatives. However, this guidance document does not set numerical thresholds for what levels of GHG emissions would constitute a significant impact, nor does the guidance document specify what types of mitigation measures should be required

by local municipalities. This guidance document also advises that when determining the effects of climate change on a proposed action, an agency should start with an identification of the future condition of the affected environment for the “no action” alternative, which should serve as the basis for evaluating and comparing the incremental effects of action alternatives.

### ***Outdoor Burning***

Burning yard waste and land-clearing debris is not allowed at any time in the City or in Pierce County. The Puget Sound Clean Air Agency (PSCAA) enforces state outdoor burning regulations required by the Revised Code of Washington (RCW 70.94.743).

### ***State of Washington Greenhouse Gas Requirements***

In response to growing worldwide concerns, Washington State Governor Christine Gregoire issued Executive Order 07-02 in February 2007. The executive order established the following GHG reduction limits (Ecology 2008a):

- Reduce emissions to 1990 levels by 2020, 25% below 1990 levels by 2035, and 50% below 1990 levels by 2050.
- Increase “green economy jobs” to 25,000. The term “green economy jobs” means the design, manufacture, marketing, and installation of equipment to support sustainable development both within and beyond Washington State.
- Reduce expenditures on fuel imported into Washington State by 20% by 2020.

The above GHG reduction goals apply state-wide, but they do not specify any requirements for local government agencies to implement measures to reduce emissions within their local jurisdictions.

The Washington Legislature enacted Revised Code of Washington (RCW) 70.235, Limiting Greenhouse Gas Emissions, into state law. This law codifies the GHG reduction goals of Executive Order 07-02 and specifies them as “limits” rather than “goals.” The new law also adds a fourth requirement to help achieve the GHG reduction targets.

- Decrease the annual per capita vehicle miles traveled (VMT) 18% by 2020, 30% by 2035, and 50% by 2050.

The state law applies only to actions taken by Washington State agencies and local governments that receive state funds for their project. State regulations on GHG emissions include prerequisites for distribution of capital funds for infrastructure and economic development projects, where projects receiving funding must be evaluated for consistency with state and federal GHG limits and state VMT goals (RCW 20.235.070).

Ecology issued guidance in 2010 for SEPA reviews related to GHG emissions, for SEPA actions for which a local government agency is the SEPA lead agency (Ecology website 2013). That guidance indicated that all SEPA reviews must evaluate GHG emissions. The guidance document presented a range of ways that local agencies could set significance thresholds, calculate GHG emissions, and potentially mitigate those emissions. However, the guidance did not stipulate what GHG significance threshold must be used, nor did it specify what level of GHG emission reduction is required under SEPA. The guidance emphasized those decisions must be made by the SEPA lead agency on a case-by-case basis.

Ecology issued revised GHG guidance in June 2011 for SEPA reviews regarding actions where Ecology is the SEPA lead agency (Ecology 2011). This guidance is applicable only to projects where Ecology is the lead agency or agency with jurisdiction. Ecology’s 2011 GHG guidance for Ecology-led SEPA determinations sets a SEPA significance threshold of 25,000 metric tons per year of GHG emissions. Additionally, the guidance states that a proposal is presumed to be not significant when it is expected to result in emissions of 25,000 metric tons or more of GHG emissions per year and has incorporated mitigation measures to reduce its emissions by approximately 11% below what its emission would have been without those mitigation measures. However, the 2011 Ecology guidelines do not specify significance thresholds or mitigation requirements for local governmental actions for which the

municipality is the SEPA lead agency. Regardless, they illustrate the importance of local actions to reduce GHG emissions.

In 2011, the Washington State Department of Commerce released an updated Washington State Energy Strategy for 2012 (DOC website 2011), which includes short- and long-term policy options to meet the following goals:

1. Maintain competitive energy prices that are fair and reasonable for consumers and businesses and support Washington's continued economic success.
2. Increase competitiveness by fostering a clean energy economy and jobs through business and workforce development.
3. Meet the state's obligations to reduce GHG emissions.

The Washington State Energy Strategy outlines strategies meeting these goals in the categories of transportation efficiency, building efficiency, distributed energy, and pricing.

### ***Puget Sound Clean Air Agency Regulations***

All construction sites in the Puget Sound region are required to implement rigorous emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15, Fugitive Dust Control Measures.

All industrial and commercial air pollutant sources in the Puget Sound region are required to register with PSCAA. Facilities with substantial emissions are required to obtain a Notice of Construction air quality permit before construction is allowed to begin. The application for this permit requires the facility to install Best Available Control Technology to reduce emissions, conduct computer modeling to demonstrate that the facility's emissions will not cause ambient pollutant concentrations to exceed the NAAQS limits, and minimize the impacts of odors and toxic air pollutants.

In 2004, PSCAA published its strategy document for climate change, entitled *Roadmap for Climate Protection: Reducing Greenhouse Gas Emissions in Puget Sound* (PSCAA 2004). In this strategy document, PSCAA recommended a broad range of GHG reduction measures including regional vehicle trip reduction, building energy efficiency improvements, solid waste reduction, forestry and agriculture practice improvements, and community education. This document also encouraged local municipalities to encourage their own GHG reduction measures; however, it did not propose a SEPA significance threshold for GHG emissions, nor did it require local governments to impose future mitigation measures for future development projects for which the municipality is the SEPA lead agency. Regardless, this document illustrates the importance of local government actions to reduce GHG emissions.

### ***Sumner Municipal Code – Regulations Relevant to GHG Emissions***

The Sumner Municipal Code (SMC) requires workplaces with 100 or more full-time employees participate in a commute trip reduction (CTR) program. Affected employers are required to develop and implement a CTR program that will encourage reduction of VMT per employee and single-occupancy vehicle (SOV) commute trips.

## **3.2.2 Impacts**

Indirect impacts caused by air pollutant emissions from stationary sources and motor vehicle tailpipes are discussed in the sections below. In addition, indirect and cumulative impacts of the alternatives' contribution to regional growth, travel, and GHG emissions are addressed.

### ***Impacts Common to All Alternatives***

This section describes the qualitative air quality issues associated with all alternatives within the study area.

### CONSTRUCTION IMPACTS

During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. Construction activity must comply with PSCAA regulations requiring reasonable precautions to minimize dust emissions (Regulation I, Section 9.15). Regardless, construction activity could cause localized fugitive dust impacts at homes and businesses near the construction site.

Construction activities would likely require the use of diesel-powered heavy trucks and smaller equipment, such as generators and compressors. The engines in this equipment would emit air pollutants that could slightly degrade local air quality in the immediate vicinity of the construction site. However, these emissions would be temporary and localized, and the resulting construction tailpipe emissions would likely be far outweighed by emissions from existing traffic around the study area.

Some construction activities could cause odors detectible to some people in the vicinity of the construction, especially during paving operations using tar and asphalt. Such odors would be short-term and localized. Stationary equipment used for the construction activities must comply with PSCAA regulations requiring the best available measures to control the emissions of odor-bearing air contaminants (Regulation I, Section 9.11). In addition, no slash burning would be permitted in association with the construction activities.

Construction equipment and material hauling could temporarily increase traffic flow on city streets adjacent to a construction area. If construction delays traffic enough to significantly reduce travel speeds in the area, general traffic-related emissions would increase.

### OPERATIONAL IMPACTS

#### *Emissions From Future Business Operations*

Under all of the alternatives, the study area is expected to experience air quality impacts due to commercial/business operations. It is likely that new commercial development would occur near either current or future residential property. Unless properly controlled, stationary equipment (such as gas stations), mechanical equipment (such as commercial boilers and heating units), and trucks at loading docks at retail buildings could cause air pollution issues at adjacent residential properties. However, stationary pollutant-emitting equipment must be registered and permitted with PSCAA (Regulation I and Regulation II). PSCAA requires all commercial and industrial facilities to use Best Available Control Technology on stationary equipment to minimize emissions. The agency may require applicants with high emissions to conduct an air quality assessment to demonstrate that the proposed emissions would not expose offsite areas to odors or pollutant concentrations in air exceeding regulatory limits. Therefore, it is unlikely that new commercial operations would cause significant air quality issues.

#### *Emissions from Vehicle Travel*

Tailpipe emissions from vehicles traveling on public streets would be the major source of air pollutant emissions associated with the growth in the study area. Potential air quality impacts caused by increased tailpipe emissions are divided into two general categories: CO hotspots caused by localized emissions at heavily congested intersections; and regional photochemical smog caused by combined emissions throughout the Puget Sound region.

### LOCALIZED HOTSPOT AIR QUALITY IMPACTS

Development under all studied alternatives would increase vehicle travel on existing public roads. However, it is unlikely that the increased traffic and congestion would cause localized air pollutant concentrations at local intersections to form a hotspot (i.e., a localized area where air pollutant concentrations exceed NAAQS). PSCAA operates ambient air pollution monitors at some of the most heavily congested intersections in the Puget Sound region, and none of those monitors have indicated exceedances over the past several years. Furthermore, ongoing EPA motor vehicle regulations have provided steady decreases in tailpipe emissions from individual vehicles, and it

is possible that those continuing decreases from individual vehicles could more than offset the increase in vehicle traffic. For these reasons, it is unlikely that air quality impacts at local intersections would be significant.

### REGIONAL AIR QUALITY IMPACTS

Tailpipe emissions for all of the alternatives would be very small relative to the overall regional tailpipe emissions within the Puget Sound air basin. Photochemical smog (the regional haze produced by ozone and fine particles) is caused by regional emissions throughout the Puget Sound, rather than localized emissions from any individual neighborhood. Photochemical smog was a serious concern in the Puget Sound region before the late 1980s, but federal tailpipe emission regulations have reduced vehicular emissions to the point that the region is currently a designated attainment area for ozone. To track the reduction of regional tailpipe emissions, Ecology's Seattle-Tacoma Puget Sound Area Ozone Maintenance Plan (Ecology 2003) set allowable emissions budgets for Puget Sound regional transportation emissions, with the understanding that as long as regional emissions are below the allowable budgets then photochemical smog impacts are unlikely to resume. Regional transportation emission budgets were set for three pollutants: CO, nitrogen oxides (NO<sub>x</sub>), and PM<sub>2.5</sub>. Based on PSRC air quality conformity analysis, forecast regional emissions for its 2040 planning year are far below the allowable budgets (PSRC 2010):

- CO: 45% of budget
- NO<sub>x</sub>: 30% of budget
- PM<sub>2.5</sub>: 51% of budget.

Numerical forecasts of increased regional vehicle miles traveled or VMT (which correlate to regional tailpipe emissions) for each of the action alternatives are presented in the following sections. Population growth and VMT can be used as indicators of future transportation-related emissions. For every alternative, the forecast VMT from the study area is only a small fraction of the Puget Sound regional totals. Additionally, forecast Puget Sound regional vehicular emissions for NO<sub>x</sub> (an ozone precursor) is projected to be less than 30% of the allowable emissions budgets designed to protect regional air quality. Therefore, the forecast increase in VMT for the action alternatives compared to the No Action Alternative would not appear to alter PSRC's conclusion that future Puget Sound regional emissions will be less than the allowable emissions budgets mandated by the air quality maintenance plans. It appears that none of the alternatives would result in a significant impact on regional air quality.

### *Mobile Source Air Toxics*

Future development might require future improvements to existing roadways. When a street is widened and, as a result, moves closer to receptors, the localized level of mobile source air toxics (MSAT) emissions could be higher, but this could be offset due to reductions in congestion (which are associated with lower MSAT emissions). Furthermore, on a regional basis, EPA's vehicle and fuel regulations (coupled with ongoing future fleet turnover) will, over time, cause substantial reductions that will cause region-wide MSAT levels to be significantly lower than today in most cases.

### **Alternative 1 Sumner Meadows Docket Application**

This section describes impacts specific to Alternative 1 – Sumner Meadows Development.

### GREENHOUSE GAS EMISSION CALCULATION METHODS

For this analysis, GHG emissions are expressed as metric tons of carbon dioxide-equivalent emissions (CO<sub>2</sub> equivalent), to account for the combined global warming potential caused by the most common GHG constituents (CO<sub>2</sub>, methane, and nitrous oxide). For purposes of comparing alternatives and determining significance under SEPA, forecast GHG emission increases are based on comparing the future emission rates for Alternatives 1 through 4 to the forecast future emission rates for Alternative 5 (No Action Alternative) and the No Action Alternative identified in the *Final Environmental Impact Statement, City of Sumner Comprehensive Plan Update and Amendments* (City of Sumner 2010). The emissions estimates for future land use conditions associated with

the Action Alternatives 1 through 4 also incorporate GHG emissions reductions that would result from mitigation measures that are proposed for the action alternatives.

The GHG emissions spreadsheet developed by King County was used to provide a screening-level estimate of life-cycle “business as usual” emissions for residential, institutional, commercial, and industrial land uses, not including any special project-level emissions reduction measures other than the energy use and vehicle trip reduction measures proposed as mitigation measures (King County website 2014). The spreadsheet is a screening-level tool that estimates GHG emissions to construct a building, and estimates the emissions generated by building occupants over the presumed life of the building. The King County spreadsheet was originally developed for use with project-level SEPA documentation for individual development projects. However, this spreadsheet was also used for this programmatic-level analysis because it is the best available screening-level tool to forecast trends in GHG emissions associated with each of the action alternatives. The available input data used for the GHG emission calculations were limited to aggregate square footages for commercial, institutional, and industrial land development, and aggregate housing units for single and multi-family housing. Given those limitations in the input data, the King County spreadsheet is considered an adequate screening-level tool for the purpose of forecasting GHG emission rates.

The King County spreadsheet uses national and statewide estimates for vehicle travel, building occupancy, and space heating, and allows the user to enter more site-specific values for key assumptions. The spreadsheet assumes the commercial and industrial buildings in Washington State will be occupied for between 58 and 62 years, and estimates life-cycle emissions within that time period. Three types of life-cycle emissions are estimated by the King County spreadsheet: embodied, energy, and transportation emissions.

- Embodied emissions are generated by construction of the building, including extraction, production, and eventual disposal of the building materials used to construct the structure. These do not include embodied emissions during the operating life of the facility to account for consumer productions purchased by residents and workers.
- Energy emissions are generated by space heating and electrical supply to the building during its lifespan. The spreadsheet incorporates energy intensity factors specific to Washington State.
- Transportation emissions include tailpipe emissions generated by on-road vehicles used by building occupants after the building is constructed. For the purpose of calculating GHG emissions for this screening-level programmatic analysis, all of the forecast commercial space was aggregated into the land use categories “Retail” and “Service.” Additionally, forecast industrial space was aggregated into the land use categories “Warehouse and Storage” and “Other.” The transportation emissions do not account for vehicles passing through the study area, unless they are directly associated with the buildings being evaluated. These emissions account for “upstream” emissions during extraction and refining of the fossil fuel used over the lifespan of the building. The transportation emissions for the commercial and industrial land use categories account only for the employees working in that space, but they do not account for the vehicle travel by delivery trucks carrying goods to or from the buildings. In addition, they do not account for vehicle travel by customers at commercial or industrial buildings.

For this analysis, a limited number of default factors were adjusted to account for information specific to the study area. The following transportation-related values were adjusted in the King County spreadsheet to account for information specific to the study area and mitigation measures proposed for the action alternatives:

- For the analysis of future years, the default value for the average fuel economy was increased to 54.5 miles per gallon to reflect EPA’s newly proposed Corporate Automobile Fuel Economy vehicle mileage standard for 2025. For the analysis of the existing condition, the spreadsheet’s default fuel economy of 19.8 miles per gallon was used.

- As noted in this section, the City proposes mitigation measures to reduce the impacts of GHG emissions for the Action Alternatives. To reduce the transportation-related GHG emissions associated with the Action Alternatives, the City proposes to provide development incentives (e.g., allow greater building heights or relax parking standards) to new businesses that provide end-of-trip bicycle facilities to its employees. It is estimated that implementing a development incentive for businesses to provide end-of-trip bicycle facilities would induce 5% of eligible business to participate, which would result in a 0.03% reduction in the increase in employee vehicle trips and resulting GHG emissions within the study area for the action alternatives compared to existing conditions. Assumptions and methods used for the calculation of mitigation measure effectiveness are provided in Appendix E.

The following building energy use values were adjusted in the King County spreadsheet to account for mitigation measures proposed for the Action Alternatives:

- To reduce the overall building energy use-related (i.e., natural gas and electricity) GHG emissions associated with the action alternatives, the City proposes to provide development incentives (e.g., allow greater building heights or relax parking standards) to businesses that construct Leadership in Energy and Environmental Design (LEED)-certified buildings. For a conservative planning estimate, it is estimated that implementing a development incentive for businesses to construct LEED-certified buildings would induce 15% of eligible business to participate, which would result in a 3.8% reduction in study area-wide building energy use for new construction for the action alternatives compared to existing conditions. Assumptions and methods used for the calculation of mitigation measure effectiveness are provided in Appendix E.
- To reduce the building electricity use-related GHG emissions associated with the action alternatives, the City proposes to provide development incentives (e.g., allow greater building heights or relax parking standards) to businesses that participate in the Puget Sound Energy (PSE) Green Power Program. It is estimated that implementing a development incentive for businesses to participate in the PSE Green Power Program would induce 1% of eligible homes and businesses to participate, which would result in a 0.5% reduction in study area-wide building electricity use for new construction for the action alternatives compared to existing conditions. Assumptions and methods used for the calculation of mitigation measure effectiveness are provided in Appendix E.
- To reduce the building electricity use-related GHG emissions associated with the Action Alternatives, the City proposes to require energy-efficient outdoor lighting for new non-residential building construction. It is estimated that requiring more energy-efficient outdoor lighting would result in a 0.8% reduction in electricity use for new non-residential construction within the study area for the action alternatives compared to existing conditions. Assumptions and methods used for the calculation of mitigation measure effectiveness are provided in Appendix E.

### LAND USE VALUES FOR GHG CALCULATIONS

This analysis considers future land use growth and future emissions increases in the study area. This analysis evaluates land use assumptions for two scenarios. The first No Action scenario presented in Exhibit 3-2 lists the land use values that assume growth in the city limits and within the City's 2010 Urban Growth Area (UGA) boundary expansion as it was approved by the City and Pierce County; the expansion was denied by the Growth Management Hearings Board and has been under appeal by the City to court, and at the time of the analysis represented the locally approved planning area. These values are provided for informational purposes only and were not used to assess regional GHG emissions.

**Exhibit 3-2. Assumed Planning Area Land Use and Population Growth for Greenhouse Gas Emission Calculations With 2010 Urban Growth Area Boundary Expansion**

Land Use Type	Existing	Net Increase under Alternatives Compared to Existing Conditions				
		Alt 1 Golf Course	Alt 2 Areawide M-1	Alt 3 Areawide M-1 and HDR	Alt 4 Offsite	Alt 5 No Action
Single-family (DUs)	2,787	1,275	1,275	1,275	1,275	1,275
Multifamily Unit in Large Bldg (DUs)	714	857	857	1,268	857	857
Multifamily Unit in Small Bldg (DUs)	683	106	106	106	106	106
Mobile Home (DUs)	305	0	0	0	0	0
Education (1,000 SF)	198	0	0	0	0	0
Retail (Other Than Mall) (1,000 SF)	613	1,360	1,240	1,240	1,360	1,360
Office (1,000 SF)	34	0	0	0	0	0
Service (1,000 SF)	502	1,378	1,259	1,259	1,378	1,378
Warehouse and Storage (1,000 SF)	1,909	8,299	8,465	8,406	5,593	5,340
Other (Manufacturing) (1,000 SF)	718	1,586	1,618	1,607	1,071	1,023

Notes: DUs = dwelling units; SF = square feet

Source: City of Sumner 2010; BERK 2014.

The second scenario, presented in Exhibit 3-3 lists the land use values that were used to assess regional GHG emissions and assume that the 2010 UGA expansion was not implemented. The City has withdrawn its appeal of the UGA expansion denial and Pierce County has informally concurred; therefore the growth assumed in the 2010 boundary expansion would not occur.

**Exhibit 3-3. Assumed Planning Area Land Use and Population Growth for Greenhouse Gas Emission Calculations Without 2010 Urban Growth Area Boundary Expansion**

Land Use Type	Existing	Net Increase under Alternatives Compared to Existing Conditions				
		Alt 1 Golf Course	Alt 2 Areawide M-1	Alt 3 Areawide M-1 and HDR	Alt 4 Offsite	Alt 5 No Action
Single-family (DUs)	2,787	1,664	1,664	1,664	1,664	1,664
Multifamily Unit in Large Bldg (DUs)	714	544	544	955	544	544
Multifamily Unit in Small Bldg (DUs)	683	106	106	106	106	106
Mobile Home (DUs)	305	0	0	0	0	0
Education (1,000 SF)	198	0	0	0	0	0
Retail (Other Than Mall) (1,000 SF)	613	833	714	714	833	833
Office (1,000 SF)	34	0	0	0	0	0
Service (1,000 SF)	502	833	714	714	833	833
Warehouse and Storage (1,000 SF)	1,909	8,364	8,529	8,471	5,658	5,404
Other (Manufacturing) (1,000 SF)	718	1,593	1,624	1,613	1,077	1,029

Source: City of Sumner 2010; BERK 2014.

#### TAILPIPE EMISSION REDUCTIONS PROVIDED BY MITIGATION MEASURES

The City proposes to mitigate tailpipe emissions by providing a development incentive for the action alternatives that will encourage employers to provide end-of-trip bicycle facilities for their employees. Implementation of this mitigation measure is expected to reduce GHG emissions compared to traditional development by reducing vehicle trips and fuel usage. For this assessment, the percent reductions in vehicle usage for new development were derived based on guidance developed by the California Air Pollution Control Officers Association (CAPCOA 2010). Control measures developed in California to reduce vehicle trips, energy consumption, and GHG emissions are expected to be equally effective in Washington. The methodology described in the guidance document estimates reduced vehicle trip generation, but it does not attempt to estimate tailpipe emission reductions associated with additional project-specific design features that might be implemented for individual future developments in the study area. For this analysis, it was assumed that a specified percentage reduction in vehicle trips would equate to that same percentage reduction in tailpipe GHG emissions. Details on how the mitigation measures were used to adjust the vehicle usage are provided in Appendix E.

The estimated vehicle trip reduction for the action alternatives compared to existing conditions was calculated to be 0.03%, so it was assumed the tailpipe GHG emission reduction would also be 0.03%.

#### “SOIL CARBON” GHG EMISSIONS FROM PERMANENT REMOVAL OR RESTORATION OF BIOMASS

Alternatives 1, 2, and 3 would remove approximately 154 acres of grassland from the existing Golf Course and tailrace area and replant the area with approximately 15 acres of grass, shrubs, and trees. Therefore, total biomass within the study area would be reduced for Alternatives 1, 2, and 3. The general term “soil carbon GHG emissions” refers to the effect of permanently removing existing vegetation for the purpose of constructing new development. This exacerbates global climate change by two mechanisms. First, the existing biomass consisting of

aboveground vegetation and underground root mass is immediately removed and disposed of, which immediately causes the biomass to decay and release carbon dioxide to the atmosphere. Second, the aboveground vegetation that was permanently removed is no longer available to remove carbon dioxide from the atmosphere during natural photosynthesis. Likewise, the restoration and replanting of vegetation in areas that have already been cleared of vegetation is a way to recapture carbon by locking the carbon into the plant structure and releasing oxygen into the atmosphere.

The “soil carbon” GHG emission rates for each alternative were estimated using the calculation tool developed by Build Carbon Neutral (Build Carbon Neutral website 2014). That tool queries the user for the acreage of the vegetation type that is removed or replanted, and then displays the annualized GHG emission rate.

Alternative 4 would allow a smaller industrial development than Alternatives 1, 2 and 3 because the site has more environmental constraints. This was factored into the analysis as well.

**CALCULATED GREENHOUSE GAS EMISSIONS**

For the purposes of this analysis, the GHG emissions are expressed in terms of their increase between the future no-action condition and future proposed land use conditions in the study area. The emissions estimate for future land use conditions accounts for GHG emissions reductions expected as a result of local development incentives and requirements proposed as mitigation measures.

Exhibit 3-2 and Exhibit 3-3 list the projected study area land uses that were used for calculating GHG emissions for each alternative. The values listed under “existing” represent current land use. The values listed for each alternative represent the net increase compared to existing conditions and the net increase compared to the future No Action alternative.

As listed in Exhibit 3-4, Alternative 1 would increase GHG emissions in the study area.

**Exhibit 3-4. Comparison of Annual Greenhouse Gas Emissions Within Study Area Without 2010 Urban Growth Area Boundary Expansion**

GHG Emissions Estimates	Average Annual GHG Emissions During 60-Year Project Lifetime (metric tons CO <sub>2</sub> -equivalent per year)				
	Alt 1 Golf Course	Alt 2 Areawide M-1	Alt 3 Areawide M-1 and HDR	Alt 4 Offsite	Alt 5 No Action <sup>2</sup>
<b>Existing Emissions</b>	160,050				
<b>GHG Emission Increases</b>					
Increase Above Existing (Buildings)	148,420	147,612	150,370	118,101	118,336
Increase Above Existing (Soil Carbon)	780	780	780	695	695
<b>Total Increase Above Existing</b>	<b>149,200</b>	<b>148,392</b>	<b>151,150</b>	<b>118,796</b>	<b>119,031</b>
Increase Above Alt 5 No Action <sup>a</sup>	30,169	29,361	32,118	-235	--
Percent GHG Emissions Reduced Due to Mitigation Measures <sup>c</sup>	12%	13%	12%	108%	--
<b>Actual GHG Emissions Reduction Due to Mitigation</b>	<b>4,277</b>	<b>4,246</b>	<b>4,220</b>	<b>3,182</b>	<b>--</b>

<sup>a</sup> GHG emissions estimates were calculated based on land use values from the No Action Alternative from the 2010 Sumner Comprehensive Plan Amendment EIS. The GHG emissions estimates for the 2010 No Action Alternative are intended to replace and supersede GHG emissions originally presented in the 2010 Sumner Comprehensive Plan EIS.

<sup>b</sup> The offsite alternative implements GHG measures citywide, and therefore results in a slight decrease in emissions over No Action (Alternative 5).

<sup>c</sup> Values represent the decrease in GHG emissions below what they would have been if no mitigation measures had been implemented for each alternative.

The residential and commercial growth for Alternative 1 is not expected to increase in the study area compared to Alternative 5 (No Action Alternative). However, Alternative 1 would provide greater light industrial growth than Alternative 5 within the study area. The result is that Alternative 1 would increase localized GHG emissions within the study area compared to Alternative 5. Future increased localized GHG emissions within the study area for Alternative 1 would be lower than Alternative 3, but higher than Alternatives 2, 4, and 5.

As noted above, Ecology’s 2011 GHG guidance for Ecology-led SEPA determinations sets a SEPA significance threshold of 25,000 metric tons per year of GHG emissions (increase compared to future no action). Additionally, the guidance states that a proposal is presumed to be not significant when it is expected to result in emissions of 25,000 metric tons or more of GHG emissions per year but has incorporated mitigation measures to reduce its emissions by approximately 11% below what its emission would have been without those mitigation measures. This guidance was released in 2011 after the 2010 Sumner Comprehensive Plan Amendment EIS was completed. Therefore, for this Draft SEIS, the City is relying on the process for determining significance based on the newer 2011 Ecology guidance document. As shown above in Exhibit 3-4, the annual GHG emission increase for Alternative 1 is greater than 25,000 metric tons. However, because the City has incorporated mitigation measures to reduce the emissions resulting from Alternative 1 by 12% below what its emission would have been without those mitigation measures, the impacts are not considered significant.

Total gross GHG emissions for Washington State were estimated to exceed 101,000,000 metric tons CO<sub>2</sub>-equivalent in 2008 (Ecology 2010). In comparison to state-wide annual GHG emissions, the relatively small increase in GHG emissions within the study area associated with Alternative 1 is not considered to be significant.

**REGIONAL VMT CONTRIBUTING TO REGIONAL TAILPIPE EMISSIONS**

Daily vehicle miles traveled (VMT) can be used as an indicator of air pollutant emissions. Exhibit 3-5 shows the contribution of regional VMT from the alternatives to Puget Sound regional VMT. The net increases in VMT forecast under Alternative 1 is inconsequential small compared to the Puget Sound regional VMT and its implied impact on regional emissions and photochemical smog. Therefore, Alternative 1 would cause a negligible impact on regional air quality.

**Exhibit 3-5. Contributions to Forecast 2030 Regional Vehicle Miles Traveled**

	<b>Alt 1 Golf Course with 24<sup>th</sup> St. Bridge</b>	<b>Alt 2 Areawide Industrial with 24<sup>th</sup> St. Bridge</b>	<b>Alt 3 Areawide Industrial and HDR with 24<sup>th</sup> St. Bridge</b>	<b>Alt 4 Offsite with 24<sup>th</sup> St. Bridge</b>	<b>Alt 5 No Action with 24<sup>th</sup> St. Bridge</b>	<b>Alt 5 No Action without 24<sup>th</sup> St. Bridge</b>
Study area daily VMT change from No Action <sup>a</sup>	2,602	2,550	2,572	567	493	0
Puget Sound region 2040 daily VMT <sup>b</sup>	85,280,704	85,280,704	85,280,704	85,280,704	85,280,704	85,280,704
Contribution to regional 2030 VMT	0.003%	0.003%	0.003%	0.0007%	0.0006%	--

Source:

<sup>a</sup> Daily VMT forecasts provided by The Transpo Group as part of modeling for this SEIS

<sup>b</sup> Puget Sound regional VMT totals for 2040 for the CO Maintenance Area (PSRC 2010).

***Alternative 2 Areawide Industrial Alternative***

This section describes impacts specific to Alternative 2 – Areawide Industrial Alternative.

CALCULATED GREENHOUSE GAS EMISSIONS

The annual GHG emissions for Alternative 2 are calculated based on the future land use listed in Exhibit 3-3 and the development reduction described previously. Exhibit 3-4 lists the annual GHG emissions increases caused by future development in the study area under each alternative. The residential growth for Alternative 2 is not expected to increase in the study area compared to Alternative 5 (No Action Alternative). However, Alternative 2 would provide greater light industrial growth and slightly less commercial growth than Alternative 5 within the study area. The result is that it would increase localized GHG emissions within the study area compared to Alternative 5. Future increased localized GHG emissions within the study area for Alternative 2 would be lower than Alternatives 1 and 3, but higher than Alternatives 4 and 5.

As shown in Exhibit 3-4, the annual GHG emissions increase for Alternative 2 is greater than 25,000 metric tons. However, because the City has incorporated mitigation measures to reduce the emissions resulting from Alternative 2 by at least 13% below what its emission would have been without those mitigation measures, the impacts are not considered significant.

Total gross GHG emissions for Washington State were estimated to exceed 101,000,000 metric tons CO<sub>2</sub>-equivalent in 2008 (Ecology 2010). In comparison to state-wide annual GHG emissions, the relatively small increase in GHG emissions within the study area associated with Alternative 2 is not considered to be significant.

REGIONAL VMT CONTRIBUTING TO REGIONAL TAILPIPE EMISSIONS

As shown in Exhibit 3-5, the net increase in VMT forecast under Alternative 2 is inconsequentially small compared to the Puget Sound regional VMT and its implied impact on regional emissions and photochemical smog. Therefore, Alternative 2 would cause a negligible impact on regional air quality.

***Alternative 3 Areawide Industrial and Residential Alternative***

This section describes impacts specific to Alternative 3 – Areawide Industrial and Residential Alternative.

CALCULATED GREENHOUSE GAS EMISSIONS

The annual GHG emissions for Alternative 3 are calculated based on the future land use listed in Exhibit 3-3 and the development reduction described previously. Exhibit 3-4 lists the annual GHG emissions increases caused by future development in the study area under each alternative. The residential growth for Alternative 3 is expected to increase in the study area compared to Alternative 5 (No Action Alternative). Additionally, Alternative 3 would provide greater light industrial growth and slightly less commercial growth than Alternative 5 within the study area. The result is that it would increase localized GHG emissions within the study area compared to Alternative 5. Future increased localized GHG emissions within the study area for Alternative 3 would be the highest of all the studied alternatives.

As shown in Exhibit 3-4, the annual GHG emissions increase for Alternative 3 is greater than 25,000 metric tons. However, because the City has incorporated mitigation measures to reduce the emissions resulting from Alternative 3 by at least 12% below what its emissions would have been without those mitigation measures, the impacts are not considered significant.

Total gross GHG emissions for Washington State were estimated to exceed 101,000,000 metric tons CO<sub>2</sub>-equivalent in 2008 (Ecology 2010). In comparison to state-wide annual GHG emissions, the relatively small increase in GHG emissions within the study area associated with Alternative 3 is not considered to be significant.

REGIONAL VMT CONTRIBUTING TO REGIONAL TAILPIPE EMISSIONS

As shown in Exhibit 3-5, the net increase in VMT forecast under Alternative 3 is inconsequentially small compared to the Puget Sound regional VMT and its implied impact on regional emissions and photochemical smog. Therefore, Alternative 3 would cause a negligible impact on regional air quality.

***Alternative 4 Offsite Alternative***

This section describes impacts specific to Alternative 4 – Offsite Alternative.

CALCULATED GREENHOUSE GAS EMISSIONS

The annual GHG emissions for Alternative 4 are calculated based on the future land use listed in Exhibit 3-3 and the development reduction described previously. Exhibit 3-4 lists the annual GHG emissions increases caused by future development in the study area under each alternative. The residential and commercial growth for Alternative 4 is expected to be equal to Alternative 5 (No Action Alternative). However, Alternative 4 would provide slightly greater light industrial growth than Alternative 5 within the study area. With the implementation of the proposed mitigation measures City-wide for all new non-residential construction, Alternative 4 would slightly decrease localized GHG emissions within the study area compared to Alternative 5.

As shown in Exhibit 3-4, the annual GHG emissions increase for Alternative 4 is less than 25,000 metric tons. Because the estimated GHG emissions would be less than the emissions anticipated from Alternative 5 (No Action Alternative), the impacts associated with Alternative 4 are not considered significant.

REGIONAL VMT CONTRIBUTING TO REGIONAL TAILPIPE EMISSIONS

As shown in Exhibit 3-5, the net increase in VMT forecast under Alternative 4 is inconsequentially small compared to the Puget Sound regional VMT and its implied impact on regional emissions and photochemical smog. Therefore, Alternative 4 would cause a negligible impact on regional air quality.

**3.2.3 Mitigation Measures**

***Incorporated Plan Features***

As noted above, the City proposes mitigation measures to reduce the impacts of GHG emissions for the action alternatives. To reduce the transportation- and energy consumption-related GHG emissions associated with the action alternatives, the City proposes to provide development incentive options that may include allowing greater building heights or relaxing parking standards for new non-residential construction if the owner or operator adopts one or more of the following mitigation measures:

- Provide end-of-trip bicycle facilities to employees. It is estimated that providing an incentive for this measure would result in at least a 0.03% study area-wide reduction on the increase in employee vehicle trips for the action alternatives compared to existing conditions.
- Construct LEED-certified buildings. It is estimated that providing an incentive for this measure would result in at least a 3.8% reduction in study area-wide non-residential building energy use (natural gas and electricity) for new construction for the action alternatives compared to existing conditions.
- Participate in the PSE Green Power Program. It is estimated that providing an incentive for this measure would result in at least a 0.5% reduction in study area-wide non-residential building electricity use for new construction for the action alternatives compared to existing conditions.

Additionally, the City proposes to require the following mitigation measure for all new non-residential construction:

- Use energy-efficient outdoor lighting. It is estimated that requiring more energy-efficient outdoor lighting would result in a 0.8% reduction in electricity use for new non-residential construction within the study area for the action alternatives compared to existing conditions.

Assumptions and methods used for calculating the effectiveness of the mitigation measure listed above are provided in Appendix E.

The City of Sumner Comprehensive Plan includes the following goals and policies that would reduce air pollutant emissions:

- Commuter Rail/ Regional Transit Sub-Element
  - 1. Support regional transit connections in the Sumner Planning Area.
  - 1.6 Plan for a train station at Stewart Road next to the golf course and adjacent to the northeastern boundary of the Sumner-Pacific Manufacturing/Industrial Center (MIC).
    - 1.6.2 Consideration will be given to design controls, compatibility with surrounding land uses, access, transit connections to other parts of town, bicycle storage relationships to pedestrian and bicycle trails, and parking.
  - 1.7 Promote the use of the Sounder commuter train by the entire Sumner community. Provide housing near the train station for households desiring the close transit availability, and provide services and businesses that cater to residents and train commuters.
  - 1.8 Work closely with Sound Transit to establish stations north at Stewart Road/Lake Tapps Parkway and at Shaw Road/East Main to relieve ridership and parking demands at the Sumner commuter rail station.
  - 1.11 Request that Sound Transit provide additional bicycle lockers at the station to encourage bicycle commuting to the station.
  - 1.12 Work with transit agencies to improve the frequency and location of transit service between high-density residential areas and the MIC, provide connections between the rail stations and the MIC, and encourage transit ridership through efforts such as prioritizing pedestrian improvements near transit stops and outreach efforts to industrial employers.
- Economic Development Element
  - 1.8 Encourage energy conservation and efficiency in building material and site design.
  - 2.6 In conjunction with transit providers, encourage an adequate transit system to serve the employment centers to allow connections to the transit centers within and outside the City and ensure transit access for those coming to work in the City.
- Community Character Element
  - 2.3 Together with Pierce Transit and other agencies, establish a network of transit stops and a transit system in the neighborhoods and districts, consistent with the Community Linkages Map, connecting to the commuter rail stations and neighborhoods.
- Environment Element
  - 1.1 Protect air quality from adverse impacts.
    - 1.1.1 In order to reduce reliance on the automobile as the primary method of transportation, encourage alternative modes of transportation.
    - 1.1.2 Require air-quality impact analysis for major new developments that could adversely impact the air quality levels in the vicinity.
    - 1.1.5 Encourage the use of alternative fuels.

- Transportation Element
  - 2. The City of Sumner will provide a transportation system that is compatible with State and regional plans, plans of adjacent jurisdictions, and with public transit providers.
  - 2.4 Continue to work with Pierce Transit and Sound Transit to support and enhance a multimodal transportation system by ensuring that the City’s transportation plans and facilities are consistent with public transit plans and programs.
  - 3.6 Provide a highly interconnected network of streets, sidewalks, bicycle lanes, and trails for ease and variety of travel.
  - 4. Promote use of alternative transportation modes by providing an interconnected system of pedestrian and bicycle facilities.
  - 4.5 A system of separated, multi-purpose trails should be constructed to serve transportation and recreation needs of the community. It should also connect with adjacent communities to facilitate regional connectivity. The trail system and connections to the arterial, collector, and other pedestrian and bicycle facilities should be made per the Sumner/Pacific Master Trail Plan.
  - 5. Develop and expand an integrated system of public transportation alternatives and demand management programs to provide mobility alternatives and reduce the need to expand the general capacity of arterials and collector streets in the City.
  - 5.1 Continue working with Pierce Transit and Sound Transit to expand and enhance bus transit service to regional destinations and to serve growing areas of Sumner.
  - 5.2 Continue working with Pierce Transit, Sound Transit, WSDOT, and local agencies to enhance access to the regional commuter rail system and Sumner’s commuter rail station.
  - 5.6 Support and coordinate with Pierce Transit, Sound Transit, and WSDOT on the development of an expanded regional park-and-ride system to support use of alternative transportation modes in the Sumner area.
  - 5.8 Promote programs that reduce the demands on the transportation system through the following strategies:
    - Encourage the use of HOV programs – buses, carpools, and vanpools – through both private programs and under the direction of Pierce Transit and Sound Transit;
    - Promote flexible work schedules allowing the use of transit, carpools, or vanpools;
    - Promote reduced employee travel during the daily peak travel periods through flexible work schedules and programs to allow employees to work part- or full-time at home or at an alternate worksite closer to home;
    - Encourage employers to provide Transportation Demand Management (TDM) measures in the workplace through such programs as preferential parking for HOVs, improved access for transit vehicles, and employee incentives for using HOVs; and
    - Implement the provisions of the state Commute Trip Reduction Act.
  - 6.3 Support continuing efforts for improving air quality throughout the Sumner area and develop a transportation system compatible with the goals of the federal and state clean air acts.
    - Coordinate with Pierce Transit, Sound Transit, and other jurisdictions on the Commute Trip Reduction programs for major employers in the Sumner planning area.

- **National Ambient Air Quality Standards:** As described above in National Ambient Air Quality Standards, the EPA establishes NAAQS and specifies future dates for states to develop and implement plans to achieve these standards.
- **State Ambient Air Quality Standards:** Ecology establishes state ambient air quality standards for the same six pollutants that are at least as stringent as the national standards; in the case of SO<sub>2</sub>, state standards are more stringent. Exhibit 3-1 lists the state ambient air quality standards for six criteria pollutants.
- **Outdoor Burning:** Burning yard waste and land-clearing debris is not allowed at any time in areas of Peirce County. PSCAA enforces state outdoor burning regulations required by RCW 70.94.743.
- **Puget Sound Clean Air Agency Regulations:** All construction sites in the Puget Sound region are required to implement rigorous emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15, Fugitive Dust Control Measures. All industrial and commercial air pollutant sources in the Puget Sound region are required to register with PSCAA. Facilities with substantial emissions are required to obtain a Notice of Construction air quality permit before construction is allowed to begin.
- **State of Washington GHG Laws:** As described above in State of Washington Greenhouse Gas Requirements, Washington enacted a new law establishing GHG reduction limits.
- **City of Sumner Ordinance 1587:** This ordinance requires affected employers (e.g., employers with 100 employees or more at a single worksite) to implement a commute trip reduction (CTR) program for its employees.

### ***Other Potential Mitigation Measures***

#### CONSTRUCTION EMISSION CONTROL

- The City should require all construction contractors to implement air quality control plans for construction activities in the study area. The air quality control plans should include best management practices (BMPs) to control fugitive dust and odors emitted by diesel construction equipment.
- During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. The following BMPs would be used to control fugitive dust.
  - Use water sprays or other non-toxic dust control methods on unpaved roadways.
  - Minimize vehicle speed while traveling on unpaved surfaces.
  - Prevent trackout of mud onto public streets.
  - Cover soil piles when practical.
  - Minimize work during periods of high winds when practical.
- Mobile construction equipment and portable stationary engines would emit air pollutants including NO<sub>x</sub>, CO, and diesel particulate matter. These emissions would be temporary and localized. It is highly unlikely that the temporary emissions would cause ambient pollutant concentrations at adjoining parcels to approach the federal limits. Typical mitigation measures to minimize air quality and odor issues caused by tailpipe emissions include the following:
  - Maintain the engines of construction equipment according to manufacturers' specifications.
  - Minimize idling of equipment while the equipment is not in use.
- Burning of slash or demolition debris would not be permitted without express approval from the PSCAA. No slash burning is anticipated for any construction projects in the study area.

GREENHOUSE GAS REDUCTION MEASURES

Washington State has established GHG reduction goals with targets for 2020 (1990 levels), 2035 (20% reduction below 1990 levels) and 2050 (50% reduction below 1990 levels) limits and adopted requirements for capital investments, an energy strategy, and VMT reduction targets. However, neither Ecology nor the EPA has adopted numerical GHG emissions standards, GHG reduction requirements, or numerical GHG significance thresholds that direct local governmental land use development actions. It is the City’s responsibility to implement its own GHG reduction requirements for new developments.

As noted above, mitigation measures proposed for the action alternatives and development goals and policies within the City’s Comprehensive Plan will help to mitigate GHG impacts within the study area. However, the City could also require or encourage future developers to implement additional mitigation, as presented in Exhibit 3-6. The measures presented in Exhibit 3-6 could reduce GHG emissions caused by transportation, facilities, building construction, space heating, and electricity usage (Ecology 2008). The table lists potential GHG reduction measures and indicates where the emission reductions might occur.

**Exhibit 3-6. Potential Greenhouse Gas Reduction Mitigation Measures**

Reduction Measures	Comments
<b>Site Design</b>	
Retain and enhance vegetated open spaces.	Retains or increases sequestration by plants.
Plant trees and vegetation near structures to shade buildings.	Reduces onsite fuel combustion emissions and purchased electricity, and enhances carbon sinks.
Minimize building footprint.	Reduces onsite fuel combustion emissions and purchased electricity consumption, materials used, maintenance, land disturbance, and direct construction emissions.
Design water efficient landscaping.	Minimizes water consumption, purchased energy, and upstream emissions from water management.
Minimize energy use through building orientation.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
<b>Building Design and Operations</b>	
Apply LEED standards (or equivalent) for design and operations.	Reduces onsite fuel combustion emissions and offsite/ indirect purchased electricity, water use, waste disposal.
Purchase Energy Star equipment and appliances for public agency use.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Incorporate onsite renewable energy production, including installation of photovoltaic cells or other solar options.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Design street lights to use energy-efficient bulbs and fixtures.	Reduces purchased electricity.
Construct “green roofs” and use high-albedo roofing materials.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Install high-efficiency HVAC systems.	Minimizes fuel combustion and purchased electricity consumption.
Eliminate or reduce use of refrigerants in HVAC systems.	Reduces fugitive emissions. Compare refrigerant usage before/after to determine GHG reduction.
Maximize interior day lighting through floor plates, increased building perimeter and use of skylights, celestories, and light wells.	Increases natural/day lighting initiatives and reduces purchased electrical energy consumption.

Reduction Measures	Comments
Incorporate energy efficiency technology such as super insulation motion sensors for lighting and climate-control-efficient, directed exterior lighting.	Reduces fuel combustion and purchased electricity consumption.
Use water-conserving fixtures that surpass building code requirements.	Reduces water consumption.
Reuse gray water and/or collect and reuse rainwater.	Reduces water consumption with its indirect upstream electricity requirements.
Use recycled building materials and products.	Reduces extraction of purchased materials, possibly reduces transportation of materials, encourages recycling and reduction of solid waste disposal.
Use building materials that are extracted and/or manufactured within the region.	Reduces transportation of purchased materials.
Use rapidly renewable building materials.	Reduces emissions from extraction of purchased materials.
Conduct third-party building commissioning to ensure energy performance.	Reduces fuel combustion and purchased electricity consumption.
Track energy performance of building and develop strategy to maintain efficiency.	Reduces fuel combustion and purchased electricity consumption.
<b>Transportation</b>	
Size parking capacity to not exceed local parking requirements and, where possible, seek reductions in parking supply through special permits or waivers.	Reduced parking discourages auto-dependent travel, encouraging alternative modes such as transit, walking, and biking. Reduces direct and indirect VMT.
Develop and implement a marketing/information program that includes posting and distribution of ridesharing/transit information.	Reduces direct and indirect VMT.
Subsidize transit passes. Reduce employee trips during peak periods through alternative work schedules, telecommuting, and/or flex time. Provide a guaranteed-ride-home program.	Reduces employee VMT.
Provide bicycle storage and showers/changing rooms.	Reduces employee VMT.
Use traffic signalization and coordination to improve traffic flow and support pedestrian and bicycle safety.	Reduces transportation emissions and VMT.
Apply advanced technology systems and management strategies to improve operational efficiency of local streets.	Reduces emissions from transportation by minimizing idling and maximizing transportation routes/systems for fuel efficiency.
Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Reduces idling fuel emissions and direct and indirect VMT.
Source: Ecology 2008.	
LEED = Leadership in Energy and Environmental Design; HVAC = heating, ventilation, and air-conditioning	

In addition to the representative GHG reduction mitigation measures listed in Exhibit 3-6 additional GHG reduction measures have been published by CAPCOA. Trip reduction measures and GHG emission reduction measures suitable for California will likely also be suitable in Washington. For example, Exhibit 3-7 lists additional emission reduction measures that could be adopted or incentivized (CAPCOA 2010). The table lists CAPCOA’s estimated range of effectiveness for reducing VMT or GHG emissions for each measure.

**Exhibit 3-7. CAPCOA Mitigation Measures for Greenhouse Gas Reductions**

<b>Measure Number</b>	<b>Title</b>	<b>Description</b>	<b>Range of Effectiveness</b>
<b>Transportation</b>			
TRT-1	Voluntary Commute Trip Reduction	A successful program will include all of the following: carpooling encouragement; ride-matching assistance; preferential carpool parking; flexible work schedules for carpools; half-time transportation coordinator; vanpool assistance; bicycle end-of-trip facilities.	1.0 – 6.2%
TRT-11	Provide Employer-Sponsored Vanpool/Shuttle	A successful program will entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at least program administration, if not more. The driver usually receives personal use of the van, often for a mileage fee.	0.3 – 13.4%
<b>Vegetation</b>			
V-1	Urban Tree Planting	Planting trees sequesters CO <sub>2</sub> while the trees are actively growing. The amount of CO <sub>2</sub> sequestered depends on the type of tree. Typically, the active growing period of a tree is 20 years and after this time the amount of carbon in biomass slows and will be completely offset by losses from clipping, pruning, and occasional death.	Variable by number of trees
<b>Alternative Energy</b>			
AE-2	Establish Onsite Renewable Energy Systems – Solar Power	Using electricity generated from photovoltaic (PV) systems displaces electricity demand that would ordinarily be supplied by the local utility. Since zero GHG emissions are associated with electricity provided by PV systems, the GHG emissions reductions are equivalent to the emissions that would have been produced had electricity been supplied by a local utility.	Variable

Source: CAPCOA 2010.

**3.2.4 Significant Unavoidable Adverse Impacts**

No significant unavoidable adverse impacts on regional or local air quality are anticipated. Temporary, localized dust and odor impacts could occur during the construction activities. The regulations, incorporated plan features, and other mitigation measures described above are adequate to mitigate any adverse impacts anticipated to occur as a result of study area growth increases.

### 3.3 Flooding

#### 3.3.1 Affected Environment

##### *White (Stuck) River Flood Conditions*

The Study Area is located on the east side of the White (Stuck) River, approximately 3.5 mile upstream of its confluence with the Puyallup River. Floods on the lower White (Stuck) River, in Pierce County, are controlled upstream by the Army Corps of Engineers' Mud Mountain Dam. Mud Mountain is regulated to store White (Stuck) River flows if flows in the Puyallup River exceed about 20,000 cubic feet per second (cfs) or if there are very large flows in the White (Stuck) River above the dam. This means that it is not common to have coincident flood peaks in the Puyallup and White (Stuck) Rivers near their confluence. The effect of flood control on the White (Stuck) River is to reduce the 10%-annual-chance flood event to 14,000 cfs, the 2% event to 15,300 cfs, and the 1% event to about 15,500 cfs in the lower White (Stuck) River.

However, sediment loads coming off Mount Rainier affect the lower White (Stuck) River. In the vicinity of the study area, near the Stewart Road (8th Street E.) Bridge, the White (Stuck) River has been significantly aggrading, through the deposition of that sediment, as the White (Stuck) River is flatter downstream and steeper upstream. Just upstream of the Stewart Road Bridge, there is a low wetland area on the left (viewed downstream) overbank.

Currently, during the 1%-annual-chance flood event (about 2,500 cfs) flows over the left bank's low levee in this area, overflows Stewart Road, and floods the Sumner Meadows Golf Course. Downstream of Stewart Road, an additional 2,800 cfs flows over the left overbank, and inundates the area between the White (Stuck) River and the BNSF railway line that runs along the east side of the valley. This combined flow of over 5,200 cfs overflows the outlet channel from Lake Tapps, and finally re-enters the lower White (Stuck) River just below 32nd Street E., where the valley wall is close to the river and development fill has been placed.

On the right (viewed downstream) overbank, during the 1%- annual-chance flood event, the town of Pacific is inundated, but this flow path is blocked by Stewart Road. to the west of the Stewart Road Bridge. Downstream of the Stewart Road Bridge, about 1,000 cfs overtops the right bank in the vicinity of the large bend near the warehouses. However, 24th Street E. blocks flow along the right overbank and this flow is forced back towards the White (Stuck) River with the warehouse area inundated to the north of 24th Street E. Downstream of 24th Street E., some water spills over the right overbank, and shallow flooding would be seen between the river and SR 167 as far south as the railway bridge to the north of Main Street.

##### *Existing Levees*

The majority of both banks of the White (Stuck) River are levied through the study area (between river miles 2.4 and 5.4). Confinement of the White (Stuck) River in this vicinity began as early as 1931 and the river was almost completely confined by 1965. In the vicinity of the Stewart Road Bridge, at approximately river mile (RM) 4.8, there is an approximate 350-foot gap without levee on the west bank. The only other gaps in the levee between RM 2.4 and 5.4 are:

- A 500-foot section on the east bank north of the tailrace channel at RM 3.7;
- A 1,500-foot gap south of the tailrace on the east bank along the large radius curve in the vicinity of 24th Street; and
- A 125-foot gap in the west bank at RM 2.6 at the location of an abandoned secondary channel.

Most of the channelization at the large S-bends between RM 4.2 and 4.5 occurred between 1931 and 1940 with the placement of rock groins. This was during the time that the river was undergoing substantial channel migration at this location. Other small sections of levee have been reinforced by landowners with the installation of construction materials and riprap. The majority of the levees, however, consists of poorly compacted silty soils that raise the bank height by approximately four feet.

***Floodplain Development Regulations***

The City of Sumner Municipal Code (SMC) provides regulations for any development occurring in the 100-year floodplain in SMC 16.16 and SMC 15.52. Section 16.16.130 of the SMC describes floodplain management. In particular, items E and F state:

- **16.16.130 E.** Shoreline developments and activities shall not increase the base flood elevation by more than one foot. Grading or other activity that would reduce the effective storage volume must be mitigated by creating compensatory storage on the site, or off-site if legal arrangements can be made to assure that the effective compensatory storage volume will be preserved over time.
- **16.16.130 F.** No development shall cause an increase in the base flood elevation by more than one foot, unless appropriate legal documents are prepared in which all property owners affected by the increased flood elevations consent to the impacts on their property. These documents shall be filed with the title of record for the affected properties.

Although the current code requires that developments and activities shall not increase the base flood elevation by more than one foot, this analysis considered mitigation that would reduce the potential flood elevation increase to zero or a “no rise” scenario.

The SMC also provides regulations for specific activities such as dikes and levees. These are found in SMC 16.20.210 (Shoreline Master Program) which states:

- A. Dikes and levees shall be limited in size to the minimum height required to protect adjacent lands from the projected flood stage, as identified in the Sumner Flood Damage Prevention Code, chapter 15.52 SMC.
- B. Dikes and levees shall not be placed in the floodway, except as current deflectors necessary for protection of bridges and roads.
- C. Public access to the shoreline shall be provided. Improved trail systems along diked or leveed shorelines are preferred.
- D. Proposals for dikes and levees shall contain a detailed evaluation of potential losses to floodplain values. This evaluation shall address: (1) groundwater discharge; (2) associated wetlands; (3) water quality; and (4) erosion/sedimentation.

Section 15.52 of SMC regulates development to minimize public and private losses due to flood conditions. The chapter includes methods and provisions for:

- A. Restricting or prohibiting uses which are dangerous to health, safety, and property due to water or erosion hazards, or which result in damaging increases in erosion or in flood heights or velocities;
- B. Requiring that uses vulnerable to floods, including facilities which serve such uses, be protected against flood damage at the time of initial construction;
- C. Controlling the alteration of natural floodplains, stream channels and natural protective barriers which help accommodate or channel floodwaters;
- D. Controlling filling, grading, dredging and other development which may increase flood damage; and
- E. Preventing or regulating the construction of flood barriers which will unnaturally divert floodwaters or which may increase flood hazards in other areas.

### 3.3.2 Impacts

#### *Impacts Common to All Alternatives*

The City retained West Consultants Inc. to develop a hydraulic model of the Lower White (Stuck) River that would analyze potential flooding impacts that could result from the alternatives considered in this SEIS. The purpose of modeling the areas hydrology was to describe the existing conditions in the Lower White (Stuck) River channel and its associated floodplain and analyze future conditions based on a set of assumptions. Existing conditions were used to model and analyze the potential impacts associated with assumed future development under each of the five alternatives under consideration. The following potential impacts section is based on West's hydraulic model results and technical report (2014). The full technical report is included as Appendix F.

The analysis and modeling effort included assumptions about other future development for each alternative that would affect flooding conditions in the Study Area. The following assumed actions were considered based on alternative and considered in the model:

- Conversion of use and fill on the Sumner Meadows Golf Course property above the 100-year floodplain for future development.
- Conversion of use and fill on the agricultural property to the south of 24th Street to an elevation above the 100-year floodplain for future development.
- The proposed King County levee setback project upstream of Stewart Road will have been built. The implications of this are that flood water will no longer overtop the banks upstream of Stewart Road and flow in a southerly direction across Stewart Road and be directed toward the Sumner Municipal Golf Course. Instead, all flow will be directed through the Stewart Road Bridge opening.
- A new crossing of White (Stuck) River along the alignment of 24th Street, which is included in the City's Transportation improvement Plan (TIP), would be constructed.
- Fill placed in the floodway fringe on the left (east) overbank downstream of Stewart Road as part of permitted development projects.

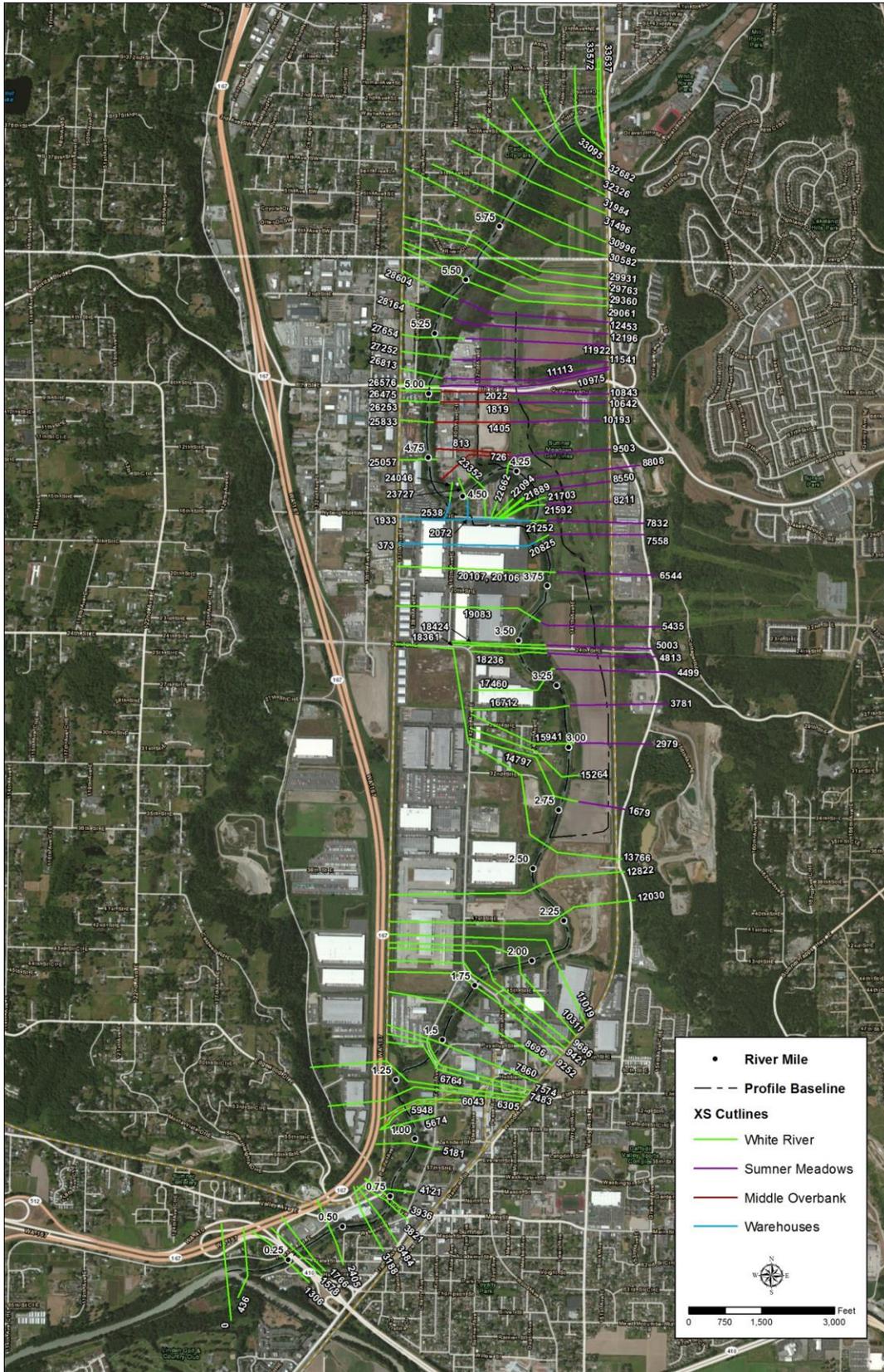
The existing 100-year water surface elevations, which do not include the projects listed above, are compared to the 100-year water surface elevations under the No Action (Alternative 5) and Action Alternatives (Alternatives 1 through 4). This comparison is based on currently planned projects and notes how flood elevations are likely to vary from existing conditions. Alternatives 1, 2 and 3 all assume the same conversion (and filling) of the golf course along with other development assumptions. While specific uses would vary among Alternatives 1-3, hydraulically they act in the same manner and are analyzed together. Alternative 4, which assumes no conversion of the golf course, but rather conversion of the agricultural property south of the golf course is treated separately. Exhibit 3-8, below shows the development assumptions modeled for each Alternative.

**Exhibit 3-8. Hydraulic Modeling Development Assumptions per Alternative**

<b>Assumption</b>	<b>Existing Conditions</b>	<b>Alt1</b>	<b>Alt2</b>	<b>Alt3</b>	<b>Alt4</b>	<b>Alt5</b>
Filling on the golf course		✓	✓	✓		
Filling on the Ag property south of 24 <sup>th</sup> Street					✓	
King County Levee Project		✓	✓	✓	✓	✓
24 <sup>th</sup> Street Bridge		✓	✓	✓	✓	✓
Currently permitted filling in the floodplain		✓	✓	✓	✓	✓

West's model looks at flood elevations under specific conditions at various points along the River. At each point, the cross section of the river's profile is documented. The model analyzes an area that extends from the BNSF railroad bridge in King County (at approximately River Mile 6.4) south to the White (Stuck) River confluence with the Puyallup River. Exhibit 3-9 shows the cross section layout of the hydraulic model used for this SEIS analysis. Water surface elevations during the 100-year flood event (or a flood having a 1% or greater annual probability of occurring) are reported at specific cross sections of the river for each of the alternatives.

Exhibit 3-9 Hydraulic Model - Lower White (Stuck) River Cross Section Layout



Source: West Consultants, 2014.

The results of the model for the 1%-annual-chance-flood event (100-year flood) are shown in Exhibit 3-10, and are color coded to match the cross sections shown in Exhibit 3-9. They show the differences in water surface elevations along the White (Stuck) River for the 100-year flow under existing conditions, the No Action Alternative (Alternative 5), Alternatives 1-3, and Alternative 4.

**Exhibit 3-10. Comparison of Water Surface Elevations During 100-year Flood**

Reach	Cross Section	Existing conditions (ft NAVD)	No Action alternative 5 (ft NAVD)	Alternatives 1-3 (ft NAVD)	Alternative 4 (ft NAVD)
Upper Main	30996	82.39	79.78	80.15	79.78
Upper Main	30582	81.41	78.99	79.07	78.99
Upper Main	29931	79.72	78.13	78.13	78.13
Upper Main	29763	78.91	77.71	77.71	77.71
Upper Main	29360	77.95	76.79	76.79	76.79
Upper Main	29061	77.05	76.23	76.23	76.23
Upper Main	28604	75.67	75.65	75.65	75.65
Upper Main	28164	74.43	75.18	75.18	75.18
Upper Main	27654	73.87	74.50	74.50	74.50
Upper Main	27252	73.00	73.47	73.47	73.47
Upper Main	26813	72.43	72.78	72.78	72.78
Upper Main	26576	72.22	72.50	72.50	72.49
Upper Main	26475	70.76	71.38	71.38	71.38
Upper Main	26253	70.30	70.92	70.92	70.92
Upper Main	25833	69.61	70.20	70.20	70.20
Upper Main	25057	67.96	68.50	68.49	68.50
Upper Main	24046	66.26	66.73	66.71	66.74
Upper Main	23727	64.17	64.63	64.74	64.63
Upper Main	23352	63.58	63.99	64.13	64.01
Upper Mid Main	22662	63.11	63.46	63.75	63.5
Upper Mid Main	22094	61.65	62.54	62.99	62.62
Upper Mid Main	21869	60.92	62.23	62.4	62.29
Upper Mid Main	21703	61.09	62.29	62.46	62.35
Upper Mid Main	21592	61.06	62.25	62.42	62.31
Upper Mid Main	21252	60.89	62.17	62.31	62.23
Upper Mid Main	20825	60.31	61.94	61.93	61.97
Middle Main	20107	59.81	61.74	61.60	61.76
Middle Main	20106	59.81	61.74	61.60	61.76
Middle Main	19083	59.42	61.58	61.19	61.69
Middle Main	18424	58.94	60.92	60.45	60.96
Middle Main	18361	58.94	60.28	59.58	60.33
Middle Main	18236	58.80	59.64	58.64	59.69
Middle Main	17460	58.43	58.98	58.59	58.96
Middle Main	16712	58.12	58.49	58.19	58.35
Middle Main	15941	57.91	58.15	57.96	57.91
Middle Main	15264	57.74	57.98	57.54	57.67

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Reach	Cross Section	Existing conditions (ft NAVD)	No Action alternative 5 (ft NAVD)	Alternatives 1-3 (ft NAVD)	Alternative 4 (ft NAVD)
Middle Main	14797	57.43	57.67	57.53	57.42
Lower Main	13766	56.87	57.11	56.87	56.87
Lower Main	12822	56.39	56.65	56.39	56.39
Lower Main	12030	56.16	56.43	56.16	56.16
Lower Main	11019	55.87	56.15	55.87	55.87
Lower Main	10311	55.57	55.83	55.57	55.57
Lower Main	9686	55.19	55.45	55.19	55.19
Lower Main	9421	55.06	55.32	55.07	55.07
Lower Main	9252	54.76	55.00	54.76	54.76
Lower Main	8696	54.65	54.88	54.65	54.65
Lower Main	7860	54.39	54.62	54.39	54.39
Lower Main	7574	54.26	54.49	54.26	54.26
Lower Main	7483	54.12	54.33	54.12	54.12
Lower Main	6764	53.79	54.00	53.79	53.79
Lower Main	6305	53.70	53.91	53.70	53.70
Lower Main	6043	53.51	53.71	53.51	53.51
Lower Main	5948	52.60	52.72	52.60	52.60
Lower Main	5674	52.44	52.55	52.44	52.44
Lower Main	5181	52.31	52.42	52.31	52.31
Lower Main	4121	51.89	51.97	51.89	51.89
Lower Main	3936	51.91	51.99	51.91	51.91
Lower Main	3821	51.91	51.99	51.91	51.91
Lower Main	3484	51.53	51.59	51.53	51.53
Lower Main	3188	51.37	51.41	51.37	51.37
Lower Main	2405	51.15	51.18	51.15	51.15
Lower Main	1766	50.98	51.00	50.98	50.98
Lower Main	1578	50.78	50.79	50.78	50.78
Lower Main	1306	50.78	50.78	50.78	50.78
Lower Main	436	50.76	50.76	50.76	50.76
Lower Main	0	50.74	50.74	50.74	50.74
Mid OB	2022	66.03	67.26	67.26	67.26
Mid OB	1819	65.97	67.20	67.19	67.20
Mid OB	1405	65.24	66.39	66.39	66.39
Mid OB	813	64.54	65.64	65.64	65.64
Mid OB	726	63.37	64.54	64.54	64.55
Warehouses	2538	64.04	64.55	64.62	64.57
Warehouses	2072	62.30	62.62	62.66	62.63
Warehouses	1933	60.40	62.08	62.15	62.12
Warehouses	373	60.37	61.99	62.00	62.02

Source: West Consultants, 2014.

### ***Alternatives 1 Sumner Meadows Docket Application, 2 Areawide Industrial Alternative, and 3 Areawide Industrial and Residential Alternative***

In general, the cumulative effects of the combination of potential future activities are increases in water surface elevations between 0.5 and 1.5 feet. The largest increases are simulated near constrictions (the future 24th Street crossing for example). When not created by the addition of a specific constriction such as the 24th Street crossing, the increases generally are caused by a reduction in the conveyance area of main channel cross sections due to the placement of fill in the cross section overbanks and cutting off of overflow pathways forcing higher peak flows back into the main channel.

With the Sumner Meadows property filled, flow would not spill from the mainstem of the White (Stuck) River into the left overbank until downstream of the 24th Street corridor at approximately RS 4813 (Exhibit 3-9). This would leave more flow in the mainstem of the White (Stuck) River through this reach causing higher water surface elevations within the mainstem.

Exhibit 3-10 shows the expected increases in 100-year water surface elevations for Alternatives 1 - 3 compared to existing conditions and the other alternatives. Increases in water surface elevations in the mainstem for the 100-year flood compared to the No Action (Alternative 5) are generally less than 1 foot downstream of 24th Street, 1 to 2 feet between 24th Street and the trail bridge, and less than 0.5 feet between the trail bridge and Stewart Road. The maximum increase is 1.84 feet and occurs at RS 19083 which is between 24th Street and the Lake Tapps tailrace. This also means that the areas to the west of the main channel within this reach, which includes several warehouses, also would have higher 100-year water surface elevations of a similar magnitude.

### ***Alternative 4 Offsite Alternative***

This alternative assumes that the 24th Street Bridge will be constructed and the agricultural property to the south of 24th Street on the left (east) overbank would be filled to an elevation above the 100-year floodplain for future development. The Countyline Levee Project is also assumed to be in place. No additional fill is placed to the north of 24th Street. This analysis also assumes that no mitigation for increases in water surface elevations has been performed. The results of the model for the 1%-annual-chance-flood event (100-year flood) under Alternative 4 are shown in Exhibit 3-10, and are color coded to match the cross sections shown in Exhibit 3-9.

Under Alternative 4, flow would no longer be conveyed in the left (east) overbank beyond 24th Street. Any flow that spilled into the left overbank from upstream would be forced back into the main channel. Additionally, the flow would not be allowed to reenter the left overbank downstream of 24th Street due to the fill that would be placed in the agricultural land to the south of the 24th Street corridor. This would leave more flow in the mainstem of the White (Stuck) River through this reach causing higher water surface elevations within the mainstem. Additionally, 24th Street Bridge Corridor would create a backwater that would propagate upstream.

Water surface elevations for the 100-year flow would be higher in the mainstem from approximately RS 24046 to RS 15941 (Exhibit 3-9) downstream of the 24th Street Corridor. Increases in water surface elevations in the mainstem for the 100-year flood compared to the No Action Alternative (Alternative 5) are generally 0.5 feet or less, except for the 4,000 feet upstream of the 24th Street Corridor where they are generally over 1 foot and are 2 feet immediately upstream of the 24th Street Corridor. This also means that the areas to the west of the main channel within this reach, which includes several warehouses, also would have higher 100-year water surface elevations of a similar magnitude. Similarly, the 100-year water surface elevations within the Sumner Meadows property are higher.

### ***Alternative 5 No Action Alternative***

The No Action Alternative (Alternative 5) includes the proposed King County Countyline Setback Levee, the new crossing of White (Stuck) River at 24th Street and currently permitted filling. These assumptions were added to the existing condition model. The results of the model for the 1%-annual-chance-flood event (100-year flood) are shown in Exhibit 3-10. Under the No Action Alternative, flow is prevented from entering the Sumner Meadows

property from upstream of Stewart Road. Flow does begin to spill from the mainstem of the White (Stuck) River onto the Sumner Meadows property (left overbank) downstream of RS 9503 (Exhibit 3-9) and flows are conveyed through the Sumner Meadows property downstream.

### 3.3.3 Mitigation Measures

#### ***Incorporated Plan Features***

None included.

#### ***Applicable Regulations and Commitments***

The City regulates development of floodplains through the critical areas regulations (Sumner Municipal Code [SMC] 16.58 and 15.52). Under any alternative, development would not be allowed to occur in the floodway. Flood-proofing would be required for any development in the 100 year floodplain (SMC 15.52). The City will continue to implement requirements of the National Flood Insurance Program (NFIP) to protect new development in the floodplains through SMC 15.52. The City will continue to enforce critical areas regulations pertaining to floodplains (SMC 16.58). The City will also continue to implement programmatic mitigation established in the 2010 Comprehensive Plan EIS to cooperate with Pierce County Water Programs with regard to improvements required along the rivers and participate in emergency planning as outlined in the Pierce County Comprehensive Emergency Preparedness Plan (Pierce County, 2006).

#### ***Other Potential Mitigation Measures***

Because the cumulative effects of potential future activities (Alternatives 1-5) are significant, concepts were developed to mitigate the anticipated increases in water surface elevations during high flow events. A series of mitigation concepts were analyzed such that when all of the concepts are performed in conjunction with the potential future activities, the cumulative result would be that there would be no significant increase in water surface elevations during the 100-year flood event. Note that this is a conceptual level investigation that is intended to serve as a “proof of concept” not an analysis of a specific mitigation design. These mitigation concepts are shown in Exhibit 3-11 and listed below:

- Mitigation Concept A: Excavation of material on the right (west) overbank near River Mile 2.1. This lowers water surface elevations downstream of the future 24th Street crossing. This mitigates for some of the increased water surface elevations caused by a new crossing of the White (Stuck) River along the 24th Street alignment.
- Mitigation Concept B: Excavation of material on the left (east) overbank from approximately River Mile 2 to River Mile 3.2. This lowers water surface elevations in the reach downstream of the future 24th Street crossing. This mitigates for some of the increased water surface elevations caused by a new crossing of the White (Stuck) River along the 24th Street alignment and for the increased flows in the main channel due to the placement of fill in the left overbank.
- Mitigation Concept C: Excavation of an overflow channel in the left overbank from approximately River Mile 3.2 to River Mile 3.6, under the future 24th Street crossing. The overflow channel in this location would have an approximate 200-foot top width and be excavated up to 10-feet deep in some locations. The channel would convey approximately 5,000 cfs at the 100-year flood. This mitigates for some of the increased water surface elevations caused by a new crossing of the White (Stuck) River along the 24th Street alignment and for the increased flows in the main channel due to the placement of fill in the left overbank.

- Mitigation Concept D: Excavation of material on the left (east) overbank from approximately River Mile 3.6 to River Mile 4.3. This lowers water surface elevations in the reach upstream of the future 24th Street crossing. This mitigates for some of the increased water surface elevations caused by a new crossing of the White (Stuck) River along the 24th Street alignment and for the increased flows in the main channel due to the placement of fill in the left overbank.
- Mitigation Concept F: Excavation of an overflow channel in the right overbank from approximately River Mile 4.0 to River Mile 4.5 or removal of the trail bridge adjacent to the golf course. Floodwaters that currently travel south through the golf course and downstream would potentially be forced back into the main channel upstream of the trail bridge at some point in the future. This would increase peak discharges at the location of the trail bridge. To mitigate for this increased discharge, there are two concepts that mitigate for the resulting increases in water surface elevations. One would be to remove the existing trail bridge. Another would be to excavate an approximately 200-foot top width overflow channel that would be 8 feet deep in places. Excavation of an overflow channel may also involve modifications to the existing trail. Note that either concept would mitigate for increases in water surface elevations and would not need to be done in conjunction.
- Mitigation Concept G: Excavation of material on the left (east) overbank from approximately River Mile 5.0 to River Mile 4.6. This lowers water surface elevations in the reach downstream of the Stewart Road crossing. This mitigates for the increased flows in the main channel due to the King County levee setback project.
- Mitigation Concept H: A new crossing of White (Stuck) River along the alignment of Stewart Road will be constructed. This would convey increased peak flows that would be created by construction of the King County levee setback project.

The City may also propose a Comprehensive Plan policy amendment, as part of its 2015 update, that would require future development to achieve zero surface water elevations through proposal design or mitigation.

Exhibit 3-12 shows the resulting differences in water surface elevations along the White (Stuck) River for the 100-year compared to existing conditions.



**Exhibit 3-12. Existing 100-year Water Surface Elevations compared to Mitigated Alternatives 1-3  
Conditions on White (Stuck) River**

Cross Section	Existing Conditions (ft NAVD)	Alternatives 1-3 (ft NAVD)	Mitigated Conditions (ft NAVD)	Difference between existing and mitigation (ft)
28604	75.67	75.67	75.27	-0.40
28164	74.43	74.43	74.68	0.25
27654	73.88	73.87	73.84	-0.04
27252	73.00	73	72.69	-0.31
26813	72.44	72.43	71.74	-0.70
26576	72.22	72.22	71.39	-0.83
26475	70.76	70.76	70.76	0.00
26253	70.30	70.3	70.13	-0.17
25833	69.61	69.61	69.37	-0.24
25057	67.96	67.96	67.67	-0.29
24046	66.26	66.26	65.47	-0.79
23727	64.16	64.17	62.38	-1.78
23352	63.58	63.58	62.01	-1.57
22662	63.10	63.11	61.37	-1.73
22094	61.64	61.65	61.04	-0.60
21869	60.92	60.92	60.81	-0.11
21703	61.08	61.09	60.74	-0.34
21592	61.06	61.06	60.69	-0.37
21252	60.88	60.89	60.52	-0.36
20825	60.31	60.31	60.09	-0.22
20107	59.80	59.81	59.42	-0.38
20106	59.80	59.81	58.98	-0.82
19083	59.42	59.42	58.59	-0.83
18424	58.94	58.94	58.62	-0.32
18361	58.93	58.94	58.58	-0.35
18236	58.80	58.8	58.55	-0.25
17460	58.43	58.43	58.14	-0.29
16712	58.12	58.12	57.76	-0.36
15941	57.91	57.91	57.46	-0.45
15264	57.74	57.74	57.24	-0.50
14797	57.43	57.43	57.08	-0.35
13766	56.87	56.87	56.62	-0.25
12822	56.39	56.39	56.14	-0.25
12030	56.16	56.16	56.06	-0.10
11019	55.87	55.87	55.88	0.01
10311	55.57	55.57	55.61	0.04
9686	55.19	55.19	55.19	0.00
9421	55.06	55.06	55.07	0.01

Note: Negative differences indicate that Mitigated Conditions are lower than Existing Conditions

***Mitigation for No Action (Alternative 5)***

Mitigation for the No Action Alternative (Alternative 5) was not simulated directly. The proposed conceptual mitigation shown in Exhibit 3-11, as mitigation for Alternatives 1-3, would lower water surface elevations to or below “existing conditions”, and as Alternatives 1-3 contain the “No Action” changes to existing conditions, mitigation of the “No Action” is determined to be possible.

***Mitigation for Alternatives 1-3***

To mitigate for the conditions that result from Alternatives 1-3, all of the above mitigation “concepts” were included in the hydraulic model in addition to the revisions made to develop the geometry for Alternatives 1-3. Exhibit 3-12 shows the resulting differences in water surface elevations along the White (Stuck) River for the 100-year compared to existing conditions. All mitigated elevations are at or below existing condition elevations, with a few exceptions that are close enough to zero for a “proof of concept” analysis.

***Mitigation for Alternative 4***

The modeling of the mitigation for Alternatives 1-3 included a conservative assumption that the areas filled under Alternative 4 would lie in the “hydraulic shadow” of the areas filled in Alternatives 1-3; meaning the ag property could be filled and would not create a rise during the 100-year flood. Therefore, the concept used to mitigate Alternatives 1-3 would also mitigate for Alternative 4. If the City chose to pursue Alternative 4, a site-specific mitigation plan could be designed and simulated to confirm the above stated assessment.

**3.3.4 Significant Unavoidable Adverse Impacts**

New development and associated fill in the flood plain of the White (Stuck) River would increase impervious surfaces and decrease flood storage. As a result surface water elevations would rise and localized flooding may occur during the 1%-annual-chance-flood event (100-year flood). If proposed mitigation is enacted, no significant unavoidable adverse impacts are anticipated. The potential impacts and conceptual mitigation in this chapter are based on a stated set of assumptions. If those assumptions were to change, impacts and mitigation would need to be remodeled to meet City requirements.

## 3.4 Plants and Animals

### 3.4.1 Affected Environment

This SEIS reviews conditions at the following sites (Exhibit 2-1):

- Sumner Meadows Golf Course;
- Private Property west of the Sumner Meadows Golf Course (Six Kilns);
- Private Property north of Stewart Road; and
- Agricultural Property south of Sumner Meadows Golf Course.

The Sumner Meadows Golf Course is comprised primarily of lawn (typical of golf courses), constructed water features, and limited tree/forest cover. It is bordered by the White (Stuck) River to the west, railroad tracks to the east, and Stewart Road to the north and 24<sup>th</sup> Street E to the south. The White (Stuck) River tailrace passes through the property at its southern end. Trees and shrubs grow along the banks of the White (Stuck) River, primarily in the 200-foot shoreline jurisdiction.

The private properties north and south of Stewart Street are largely cleared of mature vegetation. Existing plant communities on those properties include primarily terrestrial-ruderal habitat including grasses and other shrubs typical of cleared urban land. This type of setting tends to be dominated by nonnative herbs and shrubs such as cat's-ear (*Hypochaeris radicata*) and Himalayan blackberry, sometimes with fast-growing native trees such as red alder (*Alnus rubra*). The agricultural site south of Sumner Meadows is currently in agricultural use with the exception of the, roughly, 200-foot wide vegetated riparian area along the White (Stuck) River (within the City's shoreline Jurisdiction).

There are three waterbodies on these properties: the White (Stuck) River, the White (Stuck) River tail race and Eighth Street Creek. Vegetation in the riparian area adjacent to the White (Stuck) River appears to be relatively undisturbed. It consists of a 25 to 100-foot wide early successional/mixed age stand dominated by cottonwood. The Eighth Street Creek, a fish bearing stream, enters the White (Stuck) River near Stewart Road. The White (Stuck) River's banks highly altered. They are structurally stabilized through the area with earthen levees composed of sand and silt; and concrete slabs, riprap revetments, and dikes in areas.

The White (Stuck) River is occupied by three Endangered Species Act (ESA)-listed Threatened species: Coastal\Puget Sound distinct population segment (DPS) bull trout (*Salvelinus confluentus*), Puget Sound chinook salmon (*Oncorhynchus tshawytscha*), and Puget Sound steelhead (*O. mykiss*). Other fish species inhabiting the White (Stuck) River include coho salmon (*Oncorhynchus kisutch*), chum (*Oncorhynchus keta*), cutthroat trout (*Oncorhynchus clarkia*), pink salmon (*Oncorhynchus gorbuscha*), and sockeye salmon (*Oncorhynchus nerka*) (Washington Department of Fish and Wildlife 2011), as well as a number of other fish species. The White (Stuck) River and associated riparian habitat are designated critical habitat for Puget Sound evolutionary significant unit (ESU) chinook salmon (65 FR 7764) and for Coastal\Puget Sound DPS bull trout (75 Federal Register [FR] 63897). (City of Sumner, 2011 and City of Sumner, 2010)

Terrestrial wildlife species typical of riverine areas in urban settings are likely present. These include a variety of song birds and small mammals. Larger mammals, such as raccoons (*Procyon lotor*), coyotes (*Canis latrans*), and Columbian black-tailed deer (*Odocoileus hemionus columbianus*), likely use this area occasionally. There are no known listed or threatened terrestrial species with a primary association with the subject properties (WDFW, 2013).

A wetland investigation was conducted by Widener and Associates.(Appendix G). The investigation included field visits in August 2010 and January 2013. The area of the wetland investigation included the Sumner Meadows Golf Course, the vacant field adjacent to the golf course parking lot in the northeast corner of the property and the fields between the White (Stuck) River Tailrace and 24th Street. The study area is bordered by the White (Stuck) River to the west, railroad tracks to the east, Stewart Road to the north and 24th Street to the south. The study

area does not include the 200-foot buffer associated with the White (Stuck) River north of the tailrace. Two wetlands were identified within the study area in the southeast corner of the fields between the White (Stuck) River Tailrace and 24th Street (Appendix G, Figure 2). Both (Wetland A [1.29 acres] and Wetland B [0.22 acres]) were identified as are emergent wetlands. Wetland A was not intentionally created and is therefore considered a regulated wetland by the City of Sumner. Wetland B is a reed canarygrass lined swale, which would not be regulated by the City of Sumner. However, both wetlands A and B are considered jurisdiction based on U.S. Army Corps of Engineers criteria. They are both connected to the White (Stuck) River via a jurisdictional drainage running parallel to the railroad tracks which outlets to the tailrace. The water features on the golf course were not identified as jurisdictional because they did not meet jurisdictional criteria. The drainage ditch adjacent to the railroad tracks was determined to be jurisdictional as it is a 'relatively permanent water' with a connection to the White (Stuck) River (Appendix G, Figure 2). Several other locations meeting the wetland parameters were identified. However, none met the jurisdictional parameters of the U.S. Army Corps of Engineers or the City of Sumner.

### **3.4.2 Impacts**

#### ***Impacts Common to All Alternatives***

Under all four of the Action Alternatives, there would be an increase in development intensity. New development in the area could reduce the amount of habitat for song birds, small mammals and the birds of prey and larger mammals that prey on them. Development could result in a loss of undeveloped areas (the golf course) and herbaceous vegetation common on vacant land. This would represent a loss of habitat for small mammals and birds as well as potential foraging habitat for raptors and coyotes that feed on them.

None of the potentially altered properties contain forested lands or lands considered high-value habitat. Development in the southeast corner of the fields located between the Whiter River Tailrace and 24th Street could impact identified wetlands. Specific wetland impacts would be reviewed along with a specific development proposal and impacts would be required to be mitigated per City and federal wetland policies and regulations. Additional, site-specific wetland reconnaissance would be necessary for any specific development proposal on any of the other properties considered. Development would likely remain outside of the City's shoreline jurisdiction.

#### ***Alternative 1 Sumner Meadows Docket Application***

Under this alternative the land use designation of Public and Private Utilities and Facilities would be changed to Light Manufacturing. This change in designation along with the proposed changes to Comprehensive Plan text would likely result in new light industrial development on the golf course property. As noted above, new development would remove the golf courses' open areas as habitat for some songbirds and small mammals. Development could impact identified wetlands north of the Tailrace. City and Federal wetlands regulations would require mitigation for any impacts. The White (Stuck) River's shoreline will likely remain undeveloped. Shoreline regulations limit development within 200 feet of the river and the City plans to retain ownership of this area as well. No impacts to fish from new development would be anticipated provided development is constructed consistent with existing City stormwater and shoreline regulations and development standards.

#### ***Alternative 2 Areawide Industrial Alternative***

The potential for impacts under Alternative 2 would be the same for those noted under Alternative 1 on the golf course property. Under this alternative the private properties north and south of Stewart Road would be re-designated as Light Manufacturing. However, under the current designations of Urban Village and General Commercial, relative high intensity development is allowed on those properties. The change in zoning and land use would not represent a change in allowed development intensity. No additional impacts to plants and animals would be anticipated.

***Alternative 3 Areawide Industrial and Residential Alternative***

The potential for impacts under Alternative 3 would be the same for those noted under Alternative 1 on the golf course property. Under this alternative the private properties north of Stewart Road would be redesignated as Light Manufacturing and the private property south of Stewart Road would be redesignated as High-density Residential. However, under current the designations of Urban Village and “General Commercial”, relatively high intensity development is allowed on those properties. No additional impacts to plants and animals would be anticipated.

***Alternative 4 Offsite Alternative***

Generally, potential impacts to plants and animals would be similar to those described for the golf course. The change from “Public and Private Utilities and Facilities” to “Light Manufacturing” may result in redevelopment of the property from its current agricultural use. However, there are no known undisturbed or high quality habitats, listed or threatened terrestrial species, or wetlands present on the site. Conversion of this property would result in the loss of habitat for some song-bird and small mammal species. Because the property is smaller than the golf course, habitat loss would be smaller. This property is heavily constrained by the White (Stuck) River flood plain. In addition, as a condition to an Army Corps of engineers permit issued for the SR 167/24<sup>th</sup> Street interchange, the City has committed to restricting development on the property south of the golf course to 40 percent impervious surfaces. Lastly, the White (Stuck) River shoreline and riparian area would likely remain largely undeveloped. Overtime some uses may be proposed in the shoreline area, but review and mitigation consistent with City codes would be required. Additional critical areas and flood plain investigation would be necessary for any specific development proposal.

***Alternative 5 No Action Alternative***

Under this alternative, no comprehensive plan text or map changes would be made. No impacts to plant or animals would be anticipated. Current zoning would persist.

**3.4.3 Mitigation Measures*****Incorporated Plan Features***

The City’s shoreline regulations limit development within 200 feet of the White (Stuck) River shoreline, which would preserve that area as habitat. The City also plans to retain ownership of that 200 foot area. The City’s shoreline regulations also require that any permitted development or activities in the shoreline include mitigation to achieve no net loss of shoreline functions.

***Applicable Regulations and Commitments***

Although the White (Stuck) River shorelines are structurally modified through the city, riparian habitat is vegetated and unmodified. Under, the City’s shoreline regulations (SMC Title 16), light industrial uses would not be considered water-dependent and would not be allowed within 200 feet of the river’s ordinary high water mark. Any proposed development would also have to meet stormwater management requirements (SMC 13.36) and landscaping standards.

***Other Potential Mitigation Measures***

The City is contemplating a boundary line adjustment that would retain the 200-foot shoreline jurisdiction in the City’s ownership. No other mitigation measures are proposed.

### **3.4.4 Significant Unavoidable Adverse Impacts**

Under any of the alternatives, new development is likely to occur on vacant, undeveloped, or agricultural lands. These lands represent some habitat for terrestrial habitat. However, habitat is generally of low quality and no federally or state protected species have been identified in the vicinity. Development would be required to comply with the City's critical areas regulations and other mitigation measures. Lastly, the forested shorelines of the White (Stuck) River will likely be retained and preserved. Therefore, no significant adverse impacts have been identified.

### 3.5 Land Use, Aesthetics, and Socioeconomics

This section addresses current and future land use patterns and associated change in housing, population, and employment resulting from the Proposed Action and other Alternatives. This section also considers the natural and built visual setting of the subject properties and qualitatively discusses the effects of new development on that setting.

#### 3.5.1 Affected Environment

##### *Current Land Use*

The Alternatives considered in this SEIS include actions affecting four properties. These include the Sumner Meadows Golf Course, private properties to the immediate west of the golf course, private properties north of Stewart Road, and the agricultural property immediately south of the golf course. Exhibit 3-13 below lists the current use of those properties as well as current Comprehensive Plan land use designations and zoning classifications. . Exhibit 3-14 shows a current land use map of the City. Exhibit 2-11 and Exhibit 2-12 in Chapter 2 show current Comprehensive Plan and Zoning designations, respectively.

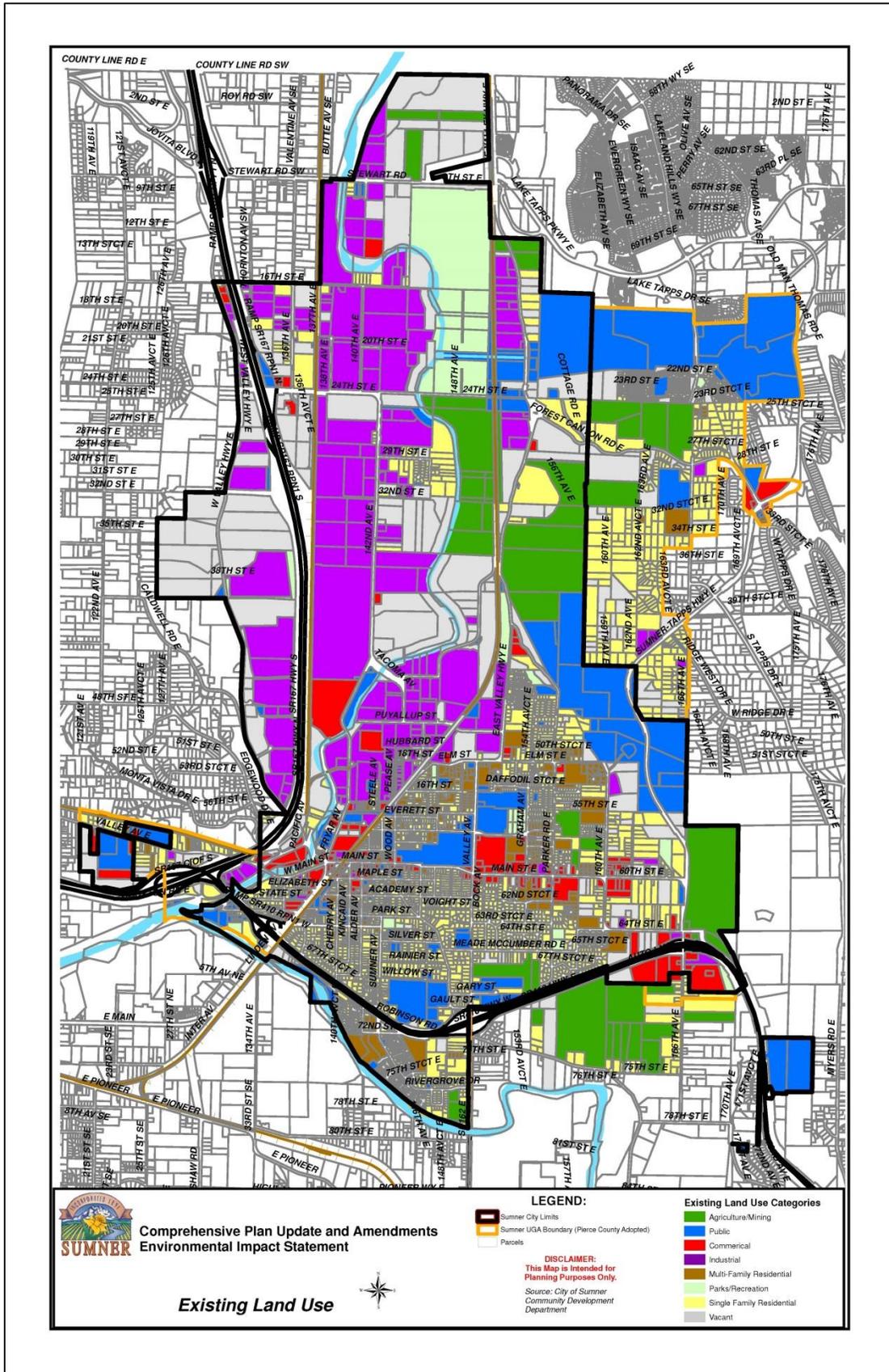
**Exhibit 3-13**  
**Current Land Use, Land Use Designations, and Zoning Classifications**

Site	Approximate Area (Acres)	Current Land Use	Comprehensive Plan Land Use Designation	Zoning
Sumner Meadows Golf Course	154	Golf Course with club house and parking (currently closed).	Public and Private Utilities and Facilities; Urban Village	Light Industrial (M-1) and General Commercial (GC)
Private property west of Golf Course (Six Kilns)	25	Vacant	Urban Village	General Commercial (GC) and High Density Residential (HDR)
Private property north of Stewart Road	15	Vacant and agriculture	General Commercial	General Commercial (GC)
City owned agricultural property south of golf course	108	Agriculture	Public and Private Utilities and Facilities	Agriculture (AG)

Source: City of Sumner GIS; BERK Consulting.

Land use surrounding all of these properties is primarily in light industrial use. The White (Stuck) River is located to the west and the golf course is bounded by the BNSF railway to the east. There is some single-family residential development on the west side of the River across from the City-owned agricultural property.

Exhibit 3-14. Current Land Use Map – Sumner City Limits



Source: City of Sumner GIS, 2013.

**Current Comprehensive Plan**

Comprehensive Plan designations on the subject properties are summarized below in Exhibit 3-15. Public and Private Facilities and Utilities is applied to the City-owned Sumner Meadows Golf Course and City-owned agriculture property to the south. Light Manufacturing is the most prevalent designation in northern Sumner and on properties to the north, west, and south of the Sumner Meadows Golf Course and City-owned agriculture property. Some Light Manufacturing and Public designations apply east of the Sumner Meadows Golf Course and City-owned agriculture property and railroad. Urban Village and General Commercial designations are applied along the frontage of Stewart Road. West of the City-owned agriculture site is a Low Density Residential 2 area reflecting long-standing homes.

**Exhibit 3-15  
Summary of Comprehensive Land Use Designations**

<b>Designation</b>	<b>Purpose</b>	<b>Primary Uses</b>	<b>Secondary Uses</b>
<b>Public and Private Facilities and Utilities</b>	Identify lands utilized to provide public and private utilities, facilities and services.	Parks, schools, medical facilities, non-profit service/organizations, public and private utilities and government buildings	Manufacturing and Industrial
<b>Urban Village</b>	Urban Villages are self-contained, tightly gridded, mixed use area with a seamless mix of residential, commercial and civic uses.	Retailing and commercial services, banks, professional offices, bed and breakfasts, hotel, civic uses, multi-family dwellings of various types.	Single-family dwellings, accessory units, adult family homes, day care, public and private educational facilities, utilities, churches and religious institutions.
<b>General Commercial</b>	The General Commercial Designation is applied to areas outside the CBD and urban villages where retailing, commercial and office uses serving a larger market are promoted.	Retail businesses, automotive sales, professional offices, hospital, medical offices, hotels, theaters, restaurants, personal service shops.	Automotive service stations, convenience stores, utilities, light manufacturing.
<b>Light Manufacturing</b>	Provide for light manufacturing, warehousing, distribution, and other support uses with landscaping and design that screens parking and building and helps meet transit goals.	Light manufacturing (particularly assembling and manufacturing of products from previously prepared material), office, warehouse/distribution, and packaging plants.	Service retail, restaurant, government, agricultural activities, and utilities subject to compatibility criteria.

Designation	Purpose	Primary Uses	Secondary Uses
<b>Manufacturing Industrial Center Overlay</b>	Establish high intensity industrial land uses for an employment and economic center on a local, county, and regional level. The MIC will be targeted for infrastructure improvements to promote the industrial and economic development in the area.	Characterized by light and heavy manufacturing uses.	Restrictions on retail uses, and a prohibition of residential uses in this area (except for those within the Town Center Plan area).
<b>Low Density</b>	Primarily- single family dwellings in areas with current or planned access to City facilities and services.	Detached single family dwellings, garages, and other accessory buildings.	Attached single family units, accessory units, adult family homes, educational facilities, utilities, and churches/religious institutions.

Source: City of Sumner Comprehensive Plan 2012; BERK Consulting 2014.

The Manufacturing/Industrial Center (MIC) overlay is applied to properties surrounding the subject properties. The purpose of the MIC is described as follows in the Comprehensive Plan Land Use Element:

*The Manufacturing/Industrial Center (MIC) Map (Figure 4A) designates the area that would be considered for high intensity industrial land uses for an employment and economic center both on a local, county, and regional level. This area will be characterized by light and heavy manufacturing uses, restrictions on retail uses, and a prohibition of residential uses in this area (except for those within the Town Center Plan area). The MIC will be targeted for infrastructure improvements to promote the industrial and economic development in the area.*

**Current Zoning**

Zoning districts implement the Comprehensive Plan Land Use Designations. There is no “Public zone” since such uses are allowed in all districts. The underlying zone for the Comprehensive Plan Public and Private Facilities and Utilities designation on the Sumner Meadows Golf Course is M-1, Light Manufacturing. Likewise on the Comprehensive Plan Public designation on the City-owned agricultural property to the south is AG, Agriculture. GC, General Commercial, and HDR, High Density Residential zones implement the Urban Village and General Commercial Comprehensive Plan Designations. The relevant Zoning district purpose statements are listed below.

- M-1, light manufacturing district (SMC 18.18.010):** The M-1 district is intended to provide areas for light manufacturing, general industrial activities, warehousing and limited service commercial uses that are complementary and are not detrimental to either existing or proposed industrial uses, or neighboring commercial and residential districts. Typical uses in this district include assembling and manufacturing of products from previously prepared material, and may include planned industrial parks which are designed to ensure compatibility between the industrial operations therein and the existing activities and character of the community in which the park is located. Some uses have different conditions when located in the Manufacturing Industrial Center.

2. **GC, General Commercial (SMC 18.16.010(B)):** The GC district is intended to provide for retailing and other commercial services that serve the large market area surrounding the Sumner community. In this respect, GC district regulations are intended to accommodate conventional commercial development that is typical to urban areas such as shopping centers, commercial malls and office complexes. Such commercial developments usually rely upon the automobile as their principal source of access.
3. **HDR, High Density Residential (SMC 18.14.010(B)):** The MDR and HDR residential districts are intended to reserve appropriately located areas for multifamily living at a broad range of dwelling unit densities consistent with the comprehensive plan. They are further intended to protect the public health, safety and general welfare by ensuring that opportunities to obtain reasonable cost housing exist for households representing a variety of income categories and lifestyles, facilitating the provision of utility services and other public facilities commensurate with anticipated population and dwelling unit densities, providing designs compatible with community goals, and providing that multifamily developments offer the amenities and conveniences necessary to assure the comfort and enhance the lifestyles of their occupants.
4. **AG, Agriculture (SMC 18.08.010):** The purpose of the agricultural district is to implement the goals and policies of the Sumner Comprehensive Plan:
  - a. To protect agricultural uses from the intrusion of nonagricultural development;
  - b. To promote the conservation of productive agricultural lands and related activities or operations; and
  - c. To maintain large areas free of impervious surfaces in order to increase the potential for natural infiltration of rainfall and the retention of natural drainage water patterns, minimizing the need for storm water facilities and increasing the protection of ground water resources.

Allowed uses vary by zone. The M-1 zone allows uses that include light manufacturing and industrial uses as well as heavy commercial uses that are typically found in fully enclosed buildings. Secondary uses in the M-1 zone include office and commercial, typically limited in scale through zoning standards. The GC zone allows for an array of commercial uses and limited light manufacturing uses, as well as multifamily residential uses. The HDR zone allows a variety of multi-family housing as well as single-family development under certain circumstances. The AG zone allows agricultural uses, and is the only application of the zone in the city limits.

### ***Aesthetics***

The setting of the study area varies. As shown in Exhibit 2-1, the private properties north of Stewart Road are cleared. The western study area parcel is vacant with no tree cover, and the eastern private parcel used for soil and material storage. The properties south of Stewart Road are also vacant and cleared. The golf course is landscaped and irrigated, and the City-owned agricultural property to the south is also cleared and leased for agriculture. The only substantial visual difference occurs adjacent to the White (Stuck) River, which is lined with mature trees and other vegetation. The golf course and adjacent undeveloped property provide a green space and view from the surrounding hillside that is in contrast to the industrial development in the area.

The subject properties are surrounded to the east, west and south by industrial development and the BNSF railway. Surrounding industrial development varies in character. There are large warehouses, 35 to 45 feet in height, container and trucking storage areas as well as other outdoor material storage. There is no commercial area nearby that would be in walking distance. Some single-family residential development occurs south of 29<sup>th</sup> St E, across the White (Stuck) River from the subject properties. There are also several vacant and undeveloped properties in the vicinity. Views from the subject properties are primarily of the hillside and a large mining operation to the east.

**Population, Housing, Employment**

There are currently no residences on the golf course property, the property south of the golf course or on the private properties north and south of Stewart Road. The private properties are currently vacant or in agricultural use. The property south of the golf course is currently in agricultural use.

The golf course is currently not operational. There are no current employees at the golf course. The soil and material storage operation north of Stewart Road has few employees.

**3.5.2 Impacts**

**Impacts Common to All Alternatives**

**Land Use**

Action Alternatives would change the mix of Land Use and Zoning designations; see Exhibit 3-16 and Exhibit 3-17. Under any of the alternatives, there would be some degree of land use intensification. On City-owned properties, the present Comprehensive Plan designation Public and Private Facilities and Utilities is implemented by zoning of M-1 Light Industrial (Golf Course), GC (Golf Course), and Agriculture (AG, City leased agriculture sites). The M-1 and GC zones allow for light industrial and commercial uses, while agriculture is the predominate allowed use on the southern City owned property. Nevertheless, for the purposes of this SEIS, Alternatives that would retain the Public and Private Facilities and Utilities designation are presumed to continue with their current land uses.

On private lands, north and south of Stewart Road, properties are currently undeveloped and designated for GC and Urban Village designations implemented by GC and HDR zoning. A variety of retail, commercial or multi-family uses is currently allowed on these properties.

**Exhibit 3-16. Land Use Designations by Alternative**

Land Use Classification	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Public and Private Facilities and Utilities	152.36	152.26	152.36	164.40	272.29
Urban Village	25.10	0	25.10	59.41	59.41
General Commercial	14.88	0	0	14.88	14.88
Light Manufacturing	154.24	194.22	169.12	107.89	0
Study Area Total	346.58	346.58	346.58	346.58	346.58

Source: City of Sumner GIS 2014.

**Exhibit 3-17. Zoning Classifications by Alternative**

Zoning Classification	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Agriculture	96.99	96.99	96.99	0	96.99
General Commercial	24.63	0	0	53.04	53.04
HDR	9.75	0	0	9.75	9.75
Light Manufacturing	215.21	249.59	224.49	283.79	186.80
Study Area Total	346.58	346.58	346.58	346.58	346.58

Source: City of Sumner GIS 2014.

**Population, Employment, and Housing**

Based on development assumptions for each of the alternatives, capacity for population, housing and jobs would change. Exhibit 3-18 below shows the assumed change in capacity resulting from each alternative.

**Exhibit 3-18  
Change in Population, Housing and Employment Capacity**

	Alternative 1 (Golf Course)	Alternative 2 (Areawide)	Alternative 3 (Areawide)	Alternative 4 (AG Property)	Alternative 5 (Areawide)
<b>Population</b>					
Current Population	-	-	-	-	-
New Capacity	-	-	990	-	86
<b>Housing</b>					
Current Housing	-	-	-	-	-
New Capacity	-	-	450	-	39
<b>Employment</b>					
Current Employment					20-40 (160 in trans. model)
Total New Capacity	3,523	3,752	3,651	302	495

Source: City of Sumner 2010; City of Sumner 2013; BERK Consulting 2014.

***Aesthetics***

Under all of the alternatives, new development is allowed and likely to occur during the planning horizon of the current Comprehensive Plan. Development is likely to change in character to match the surrounding development, predominantly light industrial. The level of allowed development would depend on the alternative. As shown in Exhibit 3-19, the height, bulk and scale of new development would follow the City’s design and development code requirements. City code also requires buffers and setbacks to mitigate potential conflicts between incompatible land uses. Current zoning of the subject properties and zoning under the alternatives includes three zones. Exhibit 3-19 below shows the development standards that would determine massing of new buildings.

**Exhibit 3-19  
Development Code Requirements**

Code requirement	Zone		
	M-1	GC	HDR
Front setback (feet)	20	5	10 <sup>2</sup>
Rear setback (feet)	20		20 <sup>2</sup>
Required landscaped setback along any common boundary with residentially zoned property (feet)	50	20	N/A
Required landscaped setback along any common boundary with commercially zoned property (feet)	10	10	N/A
Maximum lot coverage of buildings (percentage of parcel)	70	75	45
Maximum building height (feet)	35 – 45 <sup>1</sup>	35	35

Notes:

<sup>1</sup> If buildings are located greater than 100 feet from any street right-of-way or residentially or commercially zoned property the height is allowed at 45 feet. Otherwise the maximum height is 35 feet.

<sup>2</sup> For developments not requiring design review. Front, rear and interior side setbacks for developments requiring design review shall be in compliance with the city of Sumner design and development guidelines.

**Alternative 1 Sumner Meadows Docket Application**

**Land Use**

Under this Alternative, the Sumner Meadows Golf course would develop with industrial uses under the Light Manufacturing Comprehensive Plan designation and an expanded M-1, Light Industrial zone, replacing current recreational open space uses. The City has created a conceptual development plan for the purpose of this SEIS and other studies. That plan assumes a total of approximately 3.5 million square feet of high cube warehouse and manufacturing space. (See Appendix H of this SEIS.)

The intensification of warehouse and manufacturing use would increase employment capacity (as shown in Exhibit 3-18), which could increase local activity, traffic, and noise in the vicinity. However, surrounding land uses are generally compatible with industrial uses on the golf course. Surrounding uses include industrial, agriculture and vacant lands zoned for higher intensity uses, the White (Stuck) River to the west and the BNSF railroad to the east.

The parcel immediately west of the golf course (see Chapter 2, Exhibit 2-4), is zoned HDR. Development of that property with residential structures would introduce the only residential development in the immediate area and could create an incompatibility between residential and industrial uses. However, the HDR zoned parcel is currently surrounded by property zoned M-1. Therefore this alternative may exacerbate an existing planned incompatibility, but it would not create a new one. Incompatibility can be minimized through application of design guidelines, building setbacks, and landscaping as well as enforcement of development standards for noise (see Noise section of this SEIS).

**Population, Housing and Employment**

As shown in Exhibit 3-18, this alternative would not result in any new capacity for housing and therefore would have no effect on the City’s population. Based on the City-developed conceptual plan, it could generate new capacity for up to 3,523 new jobs.

**Aesthetics**

Alternative 1 would represent a substantial change to the current aesthetic environment. Under this alternative, the new Light Manufacturing land use designation of the golf course would together with the expanded M-1 Light

Industrial zoning, facilitate the change of the golf course to an industrial site with more buildings and impervious area. The City has prepared a conceptual development for the purposes of understanding potential development in the site (see Appendix H). Under the plan, there would be approximately 3.5 million new square feet of light industrial building space. Space would be within nine warehouse type building surrounded by parking and loading bays. Building would generally be between 35 and 45 feet in height and would generally match the scale of surrounding warehouse and industrial buildings. New building would follow all development standards for setback, landscaping and lighting. As noted elsewhere, the White (Stuck) River shoreline would be retained in its undeveloped and vegetated state and under City ownership.

The change in character of the golf course would effect a substantial change in the character of the immediate area. Views from Stewart Road would change from open recreation land with limited building and parking area to a number of buildings with greater bulk and scale and larger expanses of impervious area and parking. The site is generally blocked from the East Valley Highway and by riparian vegetation from the west side of the White (Stuck) River.

The change in development would also affect the view from the property immediately to the west of the golf course, which is zoned for residential development. If that property developed residential units would be viewing an industrial property rather than the recreational Golf Course. As noted above, any development would be required to comply with all City municipal code setback, landscaping and lighting standards.

### ***Alternative 2 Areawide Industrial Alternative***

#### **Land Use**

Under this Alternative the Sumner Meadows Golf Course would develop under the M-1, Light Industrial zone. Impacts from that development would be the same as described for Alternative 1. This alternative would also result in the private properties north and south of Stewart Road converting to M-1 zoning, allowing light industrial development.

As noted above, the intensification of warehouse and manufacturing use would increase employment (as shown in Exhibit 3-18), which could increase local activity, traffic, and noise in the vicinity. Under this alternative, approximately 40 additional acres could be developed for industrial rather than commercial or mixed uses. As stated for Alternative 1, surrounding land uses are compatible with the potential new industrial uses on the golf course and other properties north and south of Stewart Road. Surrounding uses include existing industrial uses and vacant lands zoned for industrial uses (M-1).

#### **Population, Housing and Employment**

As with Alternative 1 and as shown in Exhibit 3-18, this alternative would not result in any new capacity for housing and therefore would have no effect on the City's population. It could generate new capacity for up to 3,752 new jobs.

#### **Aesthetics**

Alternative 2 would also represent a substantial change to the current aesthetic environment. Under this alternative, the Light Manufacturing land use designation of the golf course would also likely result in development of the property, but would be consistent with the industrial zoning that has continued to apply. The same effects on the visual setting as noted above would apply. Regarding the private properties north and south of Stewart Road, this alternative would also include changing Comprehensive Plan Land Use designations from Urban Village and General Commercial to Light Manufacturing, and implementing zoning designations from GC and HDR to M-1, Light Industrial.

The change in character of the golf course and surrounding properties would also effect a substantial change in the character of the immediate area. Views from Stewart Road, both north and south would change from open recreational, agricultural, and vacant land to industrial buildings and warehouses. Under this alternative, there

would be no adjacent residential or commercial uses that would be affected. As a result development similar to that allowed on the golf course would be possible on these adjacent sites, and future development would be more compatible than for Alternatives 1 and 3.

### ***Alternative 3 Areawide Industrial and Residential Alternative***

#### **Land Use**

Under this Alternative the Sumner Meadows Golf Course would develop under the Light Manufacturing Comprehensive Plan Land Use designation and an expanded area of M-1, Light Industrial zoning. Impacts from that development would be the same as described for Alternative 1, above. This alternative would also result in the private properties north of Stewart Road converting from GC to Light Manufacturing Comprehensive Plan Land Use designations and from GC to M-1 Light Industrial zoning; these changes would allow more extensive light industrial development. The property south of Stewart Road would remain in the Urban Village designation, but convert entirely to HDR zoning. Thus, cumulatively, in addition to the introduction of new and more intense land uses in the form of industrial development, this Alternative could result increased residential development as well.

The intensification of warehouse and manufacturing use would increase employment (as shown in Exhibit 3-18), which could increase local activity, traffic, and noise in the vicinity. Surrounding land uses are generally compatible with these potential new uses. They include industrial uses, vacant lands zoned for higher intensity uses, the White (Stuck) River to the west and the BNSF railroad to the east.

The parcel west of the golf course (see Chapter 2, Exhibit 2-8), that would be converted to HDR would represent a potential incompatibility. As noted above, under Alternative 1, development of that property with residential structures would introduce the only residential development in the immediate area and could create an incompatibility between residential and industrial uses. However, as stated above, the HDR zoned parcel and the parcel north of it that would be rezoned HDR are currently adjacent to property zoned M-1 to their west. Therefore this alternative may exacerbate an existing incompatibility, but it would not create a new one. Incompatibility would be minimized through application of design guidelines, building setbacks, and landscaping as well as enforcement of development standards for noise (see Noise section of this SEIS). Additionally, any residential development would be separated from the M-1 zoned golf course by the 8th street canal and a 75-foot buffer required by the City's critical areas code and mature vegetated buffer could reduce noise impacts.

#### **Aesthetics**

Similar to Alternatives 1 and 2, Alternative 3 would also represent a substantial change to the current aesthetic environment. Under this alternative, the new land use designation of the golf course would likely result in development of the property for light industrial uses. The same effects on the visual setting as noted above would apply. This alternative would also include changing zoning to the private properties north of Stewart Road to M-1, Light Industrial. As a result development similar to that allowed on the golf course would be possible with similar effects on the visual environment. The property immediately west of the golf course would be converted to HDR.

The change in character of the golf course and properties north of Stewart Road would also effect a substantial change in the character of the immediate area. Views from Stewart Road, both north and south would change from open recreational, agricultural, and vacant land to industrial buildings and warehouses. West of the golf course, there would also be a change from vacant land to residential buildings. The effects on the residentially zoned property west of the golf course would be similar to those noted under Alternative 1. However, effect would be greater under this alternative because the size of the residential property would be greater. Residences would look east across the stream and planted buffer to views of industrial development rather than a Golf Course.

#### **Population, Housing and Employment**

This alternative would increase housing capacity with an assumed 450 new residential units and 990 new persons (based on a 2.2 person household size). It could also generate new capacity for up to 3,651 new jobs.

***Alternative 4 Offsite Alternative*****Land Use**

Under this Alternative the Sumner Meadows Golf Course land use designation and zoning would remain unchanged. The agricultural property immediately to the south of the golf course, south of 24<sup>th</sup> Street, would change to a Light Manufacturing designation and M-1 zoning (See Chapter 2, Exhibit 2-9). Impacts from potential development would be similar, but at a smaller scale to those described for Alternative 1. Development of that property could result in an increase of approximately 300,000 square feet of cube warehouse, warehouse or manufacturing space. As noted above this property is further constrained by floodplain and conditions of an Army Corps of Engineers permit associated with the SR 167/24<sup>th</sup> Street intersection.

The intensification of warehouse and manufacturing use would increase employment (as shown in Exhibit 3-18), which could increase local activity, traffic, and noise in the vicinity. However, as with Alternative 1, surrounding land uses are generally compatible with the potential new industrial and warehousing uses. These include industrial uses and vacant lands zoned for industrial uses. The White (Stuck) River lies to the west and the BNSF railroad to the east. There are single family homes across the river from this property that could notice an increase in traffic and lights. But the river buffer likely mitigates that potential.

**Aesthetics**

Alternative 4 would represent the least change to the current aesthetic environment. Under this alternative, the zoning of the City-owned property south of the golf course would change to M-1. New zoning could result in new development of the property. Because of topographic constraints and floodplains, it is assumed that the development capacity of this property is roughly 10 percent of that of the golf course. New industrial development would likely be of a much smaller footprint and represent a less substantial visual change.

The change in character of the property would change the views in the immediate area. Views from the golf course would be different. Views from Stewart Road would not change and, like Alternative 1, the site is general blocked from the East Valley Highway by topography, vegetation and other uses. Views from the White (Stuck) River are also blocked by riparian vegetation. As noted above, a development would be required to comply with all City setback, landscaping and lighting standards.

**Population, Housing and Employment**

As with Alternative 1 and as shown in Exhibit 3-18, this alternative would not result in any new capacity for housing and therefore would have no effect on the City's population. It could generate new capacity for up to 302 new jobs.

***Alternative 5 No Action Alternative***

Under this alternative, no Comprehensive Plan text or map changes would be made. The underlying zoning of M-1 GC would be retained. No changes to the City's capacity for housing or employment would result. The golf course could continue to operate.

**3.5.3 Mitigation Measures*****Incorporated Plan Features***

- City conceptual plans (Appendix H) would result in light industrial uses and would be subject to zoning and design standards, including setbacks and landscaping (see Applicable Regulations and Commitments).

***Applicable Regulations and Commitments*****Land Use and Aesthetics**

- Design review is required for all new multifamily, commercial, and industrial developments; the review must consider the context of the site and potential for incompatibility.

- Current M-1 zoning regulations require lighting shields, fencing, and additional landscaping and setbacks where commercial and industrially zone properties border residentially zoned property.

**Population, Employment, and Housing**

- Zoning regulations implement the Comprehensive Plan to further the City’s policies for business development, population and residential growth, and community character.
- The City’s zoning code furthers Comprehensive Plan policies for housing density, types of housing, and character.

**Other Potential Mitigation Measures**

- The City could review zoning regulations to ensure that adequate setbacks, landscaping, and buffering are required where land use conflicts may occur.
- The City is considering retaining ownership of the 200-foot shoreline jurisdiction along the White (Stuck) River which would provide a buffer between uses on the opposite bank. Overtime, some uses may be allowed in the shoreline, but would be subject to all City shoreline and critical areas regulations.

**3.5.4 Significant Unavoidable Adverse Impacts**

**Land Use**

All of the action alternatives would result in capacity for additional development on the golf course or AG properties . Under the No Action Alternative, commercial and industrial development of the private properties north and south of Stewart Road would still be allowed. All of the alternatives would have the typical effects of development such as changes to the local land use pattern and increases activity levels, traffic and noise. The localized land use impacts associated with new development could be mitigated by landscaped buffers and design guidelines. Additional noise and traffic mitigation measures are addressed in Section 3.8, Noise and 3.7, Transportation, respectively. Thus, no significant, unavoidable, and adverse impacts have been identified.

**Aesthetics**

The vicinity of the properties being considered by this analysis is currently vacant, recreational, or agricultural land. The visual character is generally open with unobstructed views through the subject properties. New development currently allowed under the No Action Alternative and potential new development allowed under the Action Alternatives, would result in changes to the current visual character of the area, and introduce greater bulk and scale, particularly on the golf course property which is large and relatively open currently. The significance of the change depends, in large, on the values of the viewer as well as the design of structures and successful implementation of required screening. Light industrial development would be consistent with surrounding land uses to the north and south, but may be less compatible adjacent to residential development to the west as is proposed in Alternatives 1 and 3. Development under all alternatives would be subject to mitigation measures in the form of policies, development regulations, design standards, and, in some cases, design review. All of these would mitigate for potentially adverse impacts to the visual quality of the area. Therefore no unavoidable significant adverse impacts are anticipated.

**Population, Employment, and Housing**

Employment could increase under all of the alternatives. Additional employment growth could result in secondary impacts on the natural and built environment and on the demand for public services. Population and the number of housing units could increase under Alternative 1 and 3 only, which would affect the natural and built environment and the demand for public services. Mitigation measures addressing other secondary impacts on the natural and built environment and the demand for public services are addressed in other sections of this SEIS. Thus, no unavoidable and adverse impacts have been identified.

## 3.6 Relationship to Plans and Policies

### 3.6.1 Affected Environment

#### State Goals

RCW Section 36.70A.020 of the GMA lists the 13 planning goals that are to guide the preparation of a community's comprehensive plan and development regulations. The goals are not listed in order of priority. They address the following topics:

- (1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.*
- (2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.*
- (3) Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.*
- (4) Housing. Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.*
- (5) Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.*
- (6) Property rights. Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.*
- (7) Permits. Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.*
- (8) Natural resource industries. Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.*
- (9) Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.*
- (10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.*
- (11) Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.*
- (12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.*
- (13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.*

A fourteenth goal was added to the GMA to reference the Shoreline Management Act goals and policies (RCW 36.70A.480).

**VISION 2040**

Multi-county planning policies are required by RCW 36.70A.210 of GMA for two or more counties with a population of 450,000 or more, and with contiguous urban areas. King, Pierce, and Snohomish Counties were required to adopt multi-county planning policies. Kitsap County chose to also participate in this effort.

VISION 2040 is the land use planning document guiding regional growth management strategies for King, Kitsap, Pierce and Snohomish Counties and was adopted by counties and cities in 2008 via the Puget Sound Regional Council (PSRC) General Assembly. VISION 2040 contains multicounty planning policies, an environmental framework, a regional growth strategy, six policy sections guided by overarching goals (environment, development patterns, housing, economy, transportation, and public services), and implementation and action measures.

Sumner’s designation in the VISION 2040 plan is “Small City.” According to *VISION 2040*, Small Cities are located throughout the region and represent nearly two-thirds of the region’s incorporated jurisdictions. Small cities in Pierce County are expected to accommodate the highest share of regional Small City population growth. (PSRC 2009)

**Countywide Planning Policies for Pierce County**

In accordance with GMA, Pierce County and the cities and towns located in the County prepared Countywide Planning Policies (CPPs). CPPs are written policy statements establishing a “countywide” framework from which county and municipal comprehensive plans are developed and adopted. The framework is intended to ensure that the municipal and county comprehensive plans are consistent. The CPPs were amended several times including in 2004 to include an update to the designation of Urban Centers and Manufacturing/Industrial Centers (MIC), relevant to the northern Sumner valley which has been designated as a regional candidate MIC. The CPPs address required topics outlined in the GMA as well as optional topics considered important to the region:

- Preamble to Countywide Planning Policies
- Affordable Housing
- Agricultural Lands
- Amendments and Transition
- Buildable Lands
- Community and Urban Design
- Economic Development and Employment
- Education
- Fiscal Impact
- Health and Well-being
- Historic, Archaeological and Cultural Preservation
- Natural Resources, Open Space, Protection of Environmentally-Sensitive Lands, and the Environment
- Rural Areas
- Siting of Essential Public Capital Facilities of a Countywide or Statewide Significance
- Transportation Facilities and Strategies
- Urban Growth Areas

The CPPs provide a framework for the preparation of local jurisdictions' comprehensive plans. Since all jurisdictions must meet these policies, consistency between plans is more assured.

***Sumner: The Vision***

The Sumner Vision Statement was originally prepared by the Comprehensive Plan Advisory Committee, subsequent to much public input, and adopted by the City Council on September 8, 1992. The City Council readopted the Vision Statement (Resolution No. 1119) on March 1, 2004, with minor changes. Key ideas in the Vision Statement continue to be:

- Maintenance of small town character.
- Logical and orderly extension of infrastructure.
- Buffering of incompatible uses where necessary while promoting “mixed-use.”
- Interconnection of areas through greenbelts trails, and intercity transit.
- Promotion of a variety of housing types affordable to the community.
- Management of growth and balancing of resource and sensitive area protection.
- Alternative transportation modes.
- Enhancement of parks and open space systems.
- Economic development in the core area as well as in the industrial park.
- Economic vitality in the Downtown through increased housing.
- Fair and reasonable governance, and adequate communication between citizens, business, industry and government. This includes increased use of the City’s website.

***City of Sumner Comprehensive Plan***

Sumner first adopted a comprehensive plan map in 1939 and developed plan updates periodically. In 1994, the plan was significantly updated per GMA requirements to include sections on natural systems, land use and zoning, public facilities, transportation, population and growth, and housing. The plan was updated in 2005 as part of a 10-year review particularly focusing on the Town Center and East Sumner. In 2010, the City considered its population and employment growth targets for the 2030 planning period and its UGA boundaries. Annually, the plan has been amended to address changed conditions such as identifying the long-planned employment area in northern Sumner as a MIC.

The Comprehensive Plan includes the following elements consistent with GMA:

- Land Use, including the following sub-elements:
  - Land Use
  - Historic and Cultural Resources
  - Essential Public Facilities
  - Commuter Rail/Regional Transit
  - Permit Process
  - Plan Monitoring and Amendment
  - Governance
- Economic Development

- Community Character
- Parks and Open Space
- Environment
- Housing
- Transportation
- Capital Facilities and Public Services
- Utilities
- Family and Human Services
- Shoreline

### ***Sumner Zoning Code***

The Zoning Code establishes which uses are permitted outright, which are conditionally permitted and which are prohibited. Its intent is to allow compatible uses in an area and segregate those uses that are incompatible as much as possible. The Zoning Ordinance map applies a zoning designation to each property in the city limits. It indicates what the city would look like in the future if lots were built according to zoning. Zoning categories include: Agriculture, Residential Protection (RP), Low Density Residential (LDR-4, LDR-6, LDR-7.2, LDR-8.5, LDR-12), Medium Density Residential (MDR), High Density Residential (HDR), Mixed Use Development (MUD), Commercial (GC, NC, NC/ES, IC, CBD), and Industrial (M-1, M-2). A majority of land is designated for low density residential uses and light industrial uses.

While overall, the Zoning Map reflects the existing Comprehensive Plan, there are differences between the Zoning Map and the Comprehensive Plan land use map. The Land Use Map designates Public and Private Facilities and Utilities, which include schools, utilities, City-owned property and others. The Zoning Map incorporates these into an appropriate zone category based on present and planned use and the surrounding neighborhoods. The other difference is that the Comprehensive Plan Land Use Map has three designations for Low Density Residential. These are further broken down within the allowed housing density range into zones. The Comprehensive Plan also contains an Urban Village designation that covers the East Sumner Neighborhood Planning area and other areas near Stewart Road and applied zoning fits the mixed use, commercial, and higher density concepts.

The Comprehensive Plan map also reflects the policies in the Town Center Plan by showing a PMUD overlay within the Town Center Area and in the Orton Junction area studied in 2010. The PMUD overlay is implemented by a number of zones. The Zoning Code also contains provisions for PMUD zone approval similar to Planned Unit Developments. The PMUD allows, following a permit process and Council approval, greater flexibility in land use mix, housing densities, design, and open space allowances.

### ***Shoreline Master Program***

The *Sumner Shoreline Master Program* was updated by the City in 2003 and approved by the Washington State Department of Ecology (Ecology) in 2004. Its purpose is to protect the shorelines within 200 feet of the White (Stuck) and Puyallup Rivers, protect fish and wildlife habitat, and increase public access.

The *Shoreline Master Program* includes three shoreline designations:

- **Urban** found primarily along the White (Stuck) River in the core area of town.
- **Shoreline Residential** found along the Puyallup River in developed areas near the shoreline.
- **Urban Conservancy** shown along the White (Stuck) River in the northern valley and along portions of the Puyallup River to the south.

The plan includes policies and development standards for each category (City of Sumner 2003). In the Urban Conservancy environment, alterations must be kept landward of 100 or 200 feet from the floodway edge or ordinary high water mark (whichever is further landward) depending on the environment designation mapping. The SMP requires a 100 foot buffer between Stewart Road to 16<sup>th</sup> Street, and 200 feet from 16<sup>th</sup> Street to 24<sup>th</sup> Street.

The City prepared a locally adopted SMP Update in 2012. As of January 2014, Ecology has provided a list of required and recommended amendments; these amendments largely address allowed uses but do not affect the shoreline environment designations. As drafted by the City, the SMP would include the following shoreline designations:

- **Natural:** Natural Environment is designated for an area of vacant land uses with relatively unaltered ecological conditions; this area includes a high value, large forested wetland complex with potential for ecological restoration and protection.
- **Urban Conservancy:** An area of mixed land uses that include residential, commercial, and industrial developments, generally located in a floodplain with potential for ecological restoration.
- **Shoreline Residential:** An area of low to moderate development intensity with existing and proposed residential land uses that still maintains significant natural features.
- **Urban:** An area of high intensity land uses that include residential, commercial, and industrial development.
- **Tapps Reservoir:** An undeveloped area owned and managed by a utility company on Lake Tapps.
- **Aquatic:** Areas waterward of the ordinary high water mark (OHWM).

The portion of the study area along the White (Stuck) River is applied Urban Conservancy designation. The Urban Conservancy area focuses on maintaining vegetation and water quality, promoting public access, and focusing on water oriented uses where feasible. Non-water-oriented uses should provide public access. The Urban Conservancy management policies are listed below:

*1) Uses that preserve the natural character of the area or promote preservation of open space, floodplain or sensitive lands either directly or over the long term should be the primary allowed uses. Uses that result in restoration of ecological functions should be allowed if the use is otherwise compatible with the purpose of the environment and the setting.*

*2) Public access should be required of all nonwater-dependent development on previously developed shorelines.*

*3) Standards should be established for shoreline stabilization measures, vegetation conservation, water quality, and shoreline modifications within the Urban Conservancy designation to ensure that new development does not result in a net loss of shoreline ecological functions or further degrade other shoreline values.*

*4) Public access and public recreation objectives should be implemented whenever feasible and significant ecological impacts can be mitigated.*

*5) Water-oriented uses should be given priority over nonwater-oriented uses. For shoreline areas adjacent to commercially navigable waters, water-dependent uses should be given highest priority.*

*6) The City should encourage conservation and/or restoration projects, such as conserving and enhancing riparian forest, re-creating off-channel habitat for salmonids, or establishing setback levees in those opportunity areas referenced in the City of Sumner Shoreline Restoration Plan Element.*

7) Publicly-owned lands in this designation may offer protection and/or restoration opportunities, such as conserving and enhancing riparian forest, re-creating off-channel habitat for salmonids, and constructing levee setbacks.

Urban Conservancy designations vary in terms of required riparian management areas with the buffers similar to the 2004 SMP described previously.

### 3.6.2 Impacts

#### Growth Management Act

Each alternative is weighed in relation to the GMA goals in the following Exhibit 3-20. The alternatives are generally consistent with GMA goals. Alternatives 1 through 4 that reduce open space on the golf course or City-owned agricultural land but that retain open space and recreation through the White (Stuck) River riparian corridor and trail would partially meet the GMA goal on retaining open space; GMA does not have a specific numeric open space requirement. All alternatives further economic development goals, particularly Alternatives 1, 2, and 3. As noted in the Washington State Administrative Code, each jurisdiction is to harmonize the goals, and differences in emphasis are expected:

*WAC 365-196-060 (2) Balancing the goals in the act. (a) The act's goals are not listed in order of priority. The ultimate burden and responsibility for planning, harmonizing the planning goals of this chapter, and implementing a county's or city's future rests with that community. Differences in emphasis are expected from jurisdiction to jurisdiction. Although there may be an inherent tension between the act's goals, counties and cities must give some effect to all the goals. Counties and cities should consider developing a written record demonstrating that it considered the planning goals during the development of the comprehensive plan and development regulations.*

**Exhibit 3-20. Growth Management Act Goals and Alternative Evaluation**

GMA Goal	Legend:					Discussion
	Alternative 1 (Golf Course)	Alternative 2 (Areawide Industrial)	Alternative 3 (Areawide Industrial/Residential)	Alternative 4 (Offsite)	Alternative 5 (No Action)	
Guide growth in urban areas	✓	✓	✓	✓	✓	All alternatives would allow for growth in an urban growth area.
Reduce sprawl	✓	✓	✓	✓	✓	All alternatives would allow for intensive employment and in some cases residential use on land in city limits.
Encourage an efficient multimodal transportation system	✓	✓	✓	○	✓	All alternatives would add traffic to the road system, but would be required to meet City concurrency standards. Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed use developments could reduce trips internally such as under Alternative 5. Alternative 3 would provide housing adjacent to jobs for a horizontal mixed use pattern in the study area. Isolated industrial development under Alternative 4 may be more difficult to meet with multimodal

<p><b>Legend:</b>                      ✓ = generally meets;                      + = greater emphasis;                      ○ = partially meets;                      N/A = not applicable;                      TBD = to be determined</p> <p><b>GMA Goal</b></p>	<p><b>Alternative 1 (Golf Course)</b></p>	<p><b>Alternative 2 (Areawide Industrial)</b></p>	<p><b>Alternative 3 (Areawide Industrial/Residential)</b></p>	<p><b>Alternative 4 (Offsite)</b></p>	<p><b>Alternative 5 (No Action)</b></p>	<p><b>Discussion</b></p>
<p><b>Encourage a variety of housing types including affordable housing</b></p>	<p>✓</p>	<p>○</p>	<p>+</p>	<p>✓</p>	<p>+</p>	<p>options.                      Alternatives 3 and 5 promote housing variety with mixed use or high density residential designations. Alternative 2 would remove the ability to develop housing in the study area. Housing is not a particular feature of other Action Alternatives 1 and 4, but would still be allowed on private properties where General Commercial (GC) or High Density Residential (HDR) designations continue on the private properties north and south of Stewart Road.</p>
<p><b>Promote economic development</b></p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>✓</p>	<p>✓</p>	<p>All alternatives provide for employment growth. Alternatives 1, 2, and 3 provide for the greatest growth and potential to contribute to the Manufacturing Industrial Center (MIC) job goals.</p>
<p><b>Recognize property rights</b></p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>Under all alternatives, all properties are given a use of land under plans and zoning.</p>
<p><b>Ensure timely and fair permit procedures</b></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>The Alternatives do not affect development regulations that address permit procedures.</p>
<p><b>Protect agricultural, forest, and mineral lands</b></p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>○</p>	<p>✓</p>	<p>Alternatives 2 and 3 assume the conversion of private land mapped by the City as agricultural resource lands north and south of Stewart Road; Alternative 4 would also convert public land mapped as agricultural resources lands and zoned as AG. The conversion of the agricultural land would reduce the use in the city; however, the lands are not considered of long-term commercial significance because: 1) the land is isolated from other agricultural properties in Pierce County; 2) the land is surrounded by urban development inside city limits; 3) the lands have land values reflecting their location in a city with services and infrastructure and intensity of nearby industrial use, and 4) there is no transfer of development rights program per WAC 365-190-050.</p>
<p><b>Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat</b></p>	<p>○</p>	<p>○</p>	<p>○</p>	<p>○</p>	<p>✓</p>	<p>Under all alternatives, land along the White (Stuck) River would stay in public designation and use for trail and open space and habitat restoration purposes. Alternatives 1, 2, and 3 would convert the golf course for employment uses and reduce the amount of public open space. Alternative 4 would retain the golf course, but would change the use of the City-owned agricultural land for employment purposes. These changes are consistent with City's parks level of service but would change the City's open space goals. GMA does not</p>

<p><b>Legend:</b>                      ✓ = generally meets;                      + = greater emphasis;                      ○ = partially meets;                      N/A = not applicable;                      TBD = to be determined</p> <p><b>GMA Goal</b></p>	<p><b>Alternative 1 (Golf Course)</b></p>	<p><b>Alternative 2 (Areawide Industrial)</b></p>	<p><b>Alternative 3 (Areawide Industrial/Residential)</b></p>	<p><b>Alternative 4 (Offsite)</b></p>	<p><b>Alternative 5 (No Action)</b></p>	<p><b>Discussion</b></p>
<p><b>Protect the environment, including air and water quality</b></p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>require a certain percentage of open space. Critical area and shoreline regulations would guide development. Land in Alternative 4 appears to have more constrained and less developable land. All alternatives would contribute to greenhouse gas emissions with the Action Alternatives 1, 2, and 3 creating the larger increases compared to the No Action Alternative 5. Alternative 4 has the least greenhouse gas emissions. Under any of the Action Alternatives, the City proposes some M-1 code amendments and incentives to reduce future emission levels below a threshold recommended by Ecology. All alternatives would be subject to City critical area and stormwater regulations including low impact development requirements.</p>
<p><b>Ensure adequate public facilities and services</b></p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>All alternatives increase the demand for public facilities and services. All would require mitigation measures to ensure adequate facilities and services per Public Services and Utilities sections of this SEIS.</p>
<p><b>Encourage historic preservation</b></p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>All alternatives would be subject to Comprehensive Plan policies and federal and state laws that promote the protection and preservation of historic and cultural features.</p>
<p><b>Foster citizen participation</b></p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>All alternatives are undergoing public review as part of the SEPA process. Chapter 2 describes the public participation efforts to date.</p>

Source: Berk Consulting, 2014.

**Multicounty Planning Policies**

VISION 2040 contains a variety of elements addressing regional growth and development. Each of these topic areas are described below, providing overarching goals where applicable.

**General Policies:** The general policies address coordination of jurisdictions, monitoring of VISION 2040, and fiscal challenges and opportunities including exploring funding sources for services and infrastructure.

*Discussion: The City coordinates with Pierce County and other cities through the Pierce County Regional Council, and is a member of the PSRC. Both bodies address coordination of jurisdictions. The PSRC also serves to fund transportation projects. Under all alternatives future development in the study area would be required to meet City service and infrastructure standards.*

**Environment:** The region will care for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, reducing greenhouse gas emissions and air pollutants, and addressing potential climate change impacts. The region acknowledges that the health of all residents is connected to the

health of the environment. Planning at all levels should consider the impacts of land use, development patterns, and transportation on the ecosystem.

*Discussion: All alternatives would be required to comply with the City's critical area and shoreline regulations. All alternatives would contribute to greenhouse gas emissions with the Action Alternatives 1, 2, and 3 creating larger increases compared to the No Action Alternative 5. Alternative 4 has the least greenhouse gas emissions. Under any of the Action Alternatives, the City proposes some M-1 code amendments and incentives to reduce future emission levels below a threshold recommended by Ecology. All alternatives would be subject to City critical area and stormwater regulations including low impact development requirements. This SEIS addresses the impacts of land use, development patterns, and transportation and provides mitigation measures to reduce impacts.*

**Development Patterns:** The region will focus growth within already urbanized areas to create walkable, compact, and transit-oriented communities that maintain unique local character. Centers will continue to be a focus of development. Rural and natural resource lands will continue to be permanent and vital parts of the region.

*Discussion: All alternatives focus growth in the city limits. Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed-use developments could reduce trips internally such as under Alternative 5. Alternative 3 would provide housing adjacent to jobs for a horizontal mixed use pattern in the study area. Isolated industrial development under Alternative 4 may be more difficult to meet with multimodal options.*

**Housing:** The region will preserve, improve, and expand its housing stock to provide a range of affordable, healthy, and safe housing choices to every resident. The region will continue to promote fair and equal access to housing for all people.

*Discussion: Alternatives 3 and 5 promote housing variety with mixed use or high density residential designations. Alternative 2 would remove the ability to develop housing in the study area. Housing is not a particular feature of other Action Alternatives 1 and 4, but would still be allowed on private properties where GC or HDR designations continue on the private properties north and south of Stewart Road.*

**Economy:** The region will have a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.

*Discussion: All alternatives provide for employment growth. Alternatives 1, 2, and 3 provide for the greatest growth and potential to contribute to the MIC job goals.*

**Transportation:** The region will have a safe, cleaner, integrated, sustainable, and highly efficient multimodal transportation system that supports the regional growth strategy and promotes economic and environmental vitality, and better public health.

*Discussion: All alternatives would add traffic to the road system, but would be required to meet City concurrency standards. See the Transportation section of this SEIS. See also the discussion under Development Patterns.*

**Public Services:** The region will support development with adequate public facilities and services in a coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.

*Discussion: Under all alternatives future development in the study area would be required to meet City service and infrastructure standards.*

VISION 2040 is implemented through PSRC's policy and plan review of each county and city comprehensive plan and their amendment. PSRC also certifies transportation elements, as well as the regional transportation improvement program, and evaluating performance measures.

Transportation 2040 supports VISION 2040 planning for a transportation system supporting the growth strategy. Transportation 2040 is built around three key strategies, as stated in the plan’s executive summary:

**Congestion and Mobility.** The plan improves mobility through a combination of effective land use planning, demand management, efficiency enhancements, and strategic capacity investments. To improve system efficiency, the plan creates “smart corridors” with advanced technology, better information for travelers, and advanced tolling approaches which adjust for actual traffic conditions. Capacity improvements strategically expand roadway, transit, and non-motorized facilities, with new roadways limited to key missing links and enhancing existing facilities. This plan includes additional attention to monitoring system performance.

*Discussion: All alternatives would add traffic to the road system, but would be required to meet City concurrency standards. The traffic model tests the City’s planned improvements in its Comprehensive Plan and TIP.*

*Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed use developments could reduce trips internally such as under Alternative 5. Alternative 3 would provide housing adjacent to jobs for a horizontal mixed use pattern in the study area. Isolated industrial development under Alternative 4 may be more difficult to meet with multimodal options.*

**Environmental Health.** A key focus of the plan is to protect and improve the region’s environmental health. This includes ensuring that the region has healthy air that meets all standards, ensuring that transportation projects improve the handling of stormwater runoff to protect Puget Sound and other surface waters, and addressing emerging issues such as transportation’s role in reducing greenhouse gas emissions and adapting to climate change. The plan includes a specific strategy to address state greenhouse gas goals and VMT reduction benchmarks. The four-part strategy includes Land Use, Transportation Pricing, Transportation Choices, and Technology. In addition, the plan builds on current efforts to protect natural areas and support vibrant, livable communities.

*Discussion: All alternatives would contribute to greenhouse gas emissions with the Action Alternatives 1, 2, and 3 creating the larger increases compared to the No Action Alternative 5. Alternative 4 has the least greenhouse gas emissions. Under any of the Action Alternatives, the City proposes some M-1 code amendments and incentives to reduce future emission levels below a threshold recommended by Ecology. All alternatives would be subject to City critical area and stormwater regulations including low impact development requirements.*

**Funding.** The Transportation 2040 financial strategy relies on traditional funding sources in the early years of the plan. Over time the region will transition to a new funding structure based on user fees, which could include high-occupancy toll (HOT) lanes, facility and bridge tolls, highway system tolls, vehicle miles traveled (VMT) charges, and other pricing approaches that replace the gas tax and further fund and manage the transportation system. Funding strategies need to include a nexus between the tax, fee, or toll and the use of the revenues.

*Discussion: This financial strategy is a regional one and not applicable to the Sumner Meadows Docket or Alternatives. See discussion of inter-jurisdictional coordination under VISION 2040 above.*

### **Countywide Planning Policies**

The Countywide Planning Policies are extensive across a variety of growth management topics; the intent of each policy chapter is provided below along with a discussion of compatibility.

**Affordable Housing:** Consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution.

*Discussion: Alternatives 3 and 5 promote housing variety with mixed use or high density residential designations. Alternative 2 would remove the ability to develop housing in the study area. Housing is not a*

*particular feature of other Action Alternatives 1 and 4, but would still be allowed on private properties where GC or HDR designations continue on the private properties north and south of Stewart Road.*

**Agriculture:** Maintain and enhance natural resource-based industries, including productive agricultural industries, and the conservation of productive agricultural lands.

*Discussion: Alternatives 2 and 3 assume the conversion of private land mapped by the City as agricultural resource lands north and south of Stewart Road; Alternative 4 would also convert public land mapped as agricultural resources lands and zoned as AG. These lands were mapped due to parcel size, prime soils, and agricultural use as of 1992 and 2003 (SMC 16.42.060).*

*The conversion of the agricultural land would reduce the use in the city; however, the lands are not considered of long-term commercial significance because: 1) the land is isolated from other agricultural properties in Pierce County; 2) the land is surrounded by urban development inside city limits; 3) the lands have land values reflecting their location in a city with services and infrastructure and intensity of nearby industrial use, and 4) there is no transfer of development rights program per WAC 365-190-050*

**Amendments and Transition:** Provides a process to amend the Countywide Planning Policies, and how Urban Growth Areas, and the operation of the Pierce County Regional Council.

*Discussion: These policies do not apply to the Sumner Meadows Docket or Alternatives.*

**Buildable Lands:** Policies address the process and information each jurisdiction is to provide to complete the buildable lands analysis.

*Discussion: The City cooperates with Pierce County regarding the Buildable Lands Report. See the discussion of the growth targets and capacity estimates in the discussion of urban growth areas below.*

**Community and Urban Design:** Encourage urban development that has increased density, and is compact and serviced by multiple transportation alternatives.

*Discussion: All alternatives focus growth in the city limits. Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed-use developments could reduce trips internally such as under Alternative 5. Alternative 3 would provide housing adjacent to jobs for a horizontal mixed use pattern in the study area. Isolated industrial development under Alternative 4 may be more difficult to serve with multimodal options.*

**Economic Development and Employment:** Work to achieve a prospering and sustainable regional economy; promote diverse economic opportunities for all citizens of the County, especially the unemployed, disadvantaged persons, minorities and small businesses; encourage economic development in areas in which there are insufficient employment opportunities; ensure that economic growth remains within the capacities of the state's natural resources, public services and public facilities; plan for sufficient economic growth and development to ensure an appropriate balance of land uses which will produce sound financial position; strengthen existing businesses and industries and add to the diversity of economic opportunity and employment.

*Discussion: All alternatives provide for employment growth. Alternatives 1, 2, and 3 provide for the greatest growth and potential to contribute to the City's MIC job goals. The City's MIC was added specifically to the CPPs as a regional candidate center, and the City intends to pursue final designation in VISION 2040 through the Pierce County Regional Council. This could help attract infrastructure funding benefit the MIC and the rest of the city. Alternative 4 provides some employment growth, but it is relatively small and would be located on a potentially constrained site. Alternative 5 provides the least employment capacity of those alternatives studied.*

**Education:** Strive to achieve excellence in education and to offer diverse educational opportunities to be made available to all residents; coordinate with other institutions or governmental entities responsible for providing educational services; determine specific siting requirements for all public and private educational facilities.

*Discussion: The alternatives do not address educational uses. Alternatives 3 and 5 include the potential for housing and mixed use that may generate students; see the public services analysis in section 3.9 of this SEIS.*

**Fiscal Impact:** Fiscal impact analysis will be required only for governmental decisions affecting jurisdictional responsibilities and/or boundaries and significant public and private development projects. “The purposes of fiscal impact analysis are to assess the relative costs of providing public facilities and services, with the public revenues that will be derived from: (a) decisions affecting jurisdictional responsibilities and/or boundaries and (b) significant public and private development projects.” And “use the results of any required fiscal impact analysis as one of the factors in determining acceptance, modification, or rejection of the proposal/project.”

*Discussion: The City has not conducted a fiscal analysis; however, the surplus of the golf course for sale and development is meant to address the City’s fiscal responsibilities to reimburse the utility fund consistent with State Auditor findings. Private or public development under any studied alternative will be required to meet City standards for public facilities and services.*

**Health and Well Being:** Encourage walking and other alternatives to the automobile; protect the environment including air and water quality; promote physical activity such as through non-motorized plans and development design that promotes walkability.

*Discussion: See Community and Well Being. Also, trail plans would continue in the remaining public-owned land along the White (Stuck) River under all alternatives.*

**Historic, Archaeological and Cultural Preservation:** Identify and encourage the preservation of lands, sites and structures that have historical or archaeological significance.

*Discussion: All alternatives would be subject to Comprehensive Plan policies and federal and state laws that promote the protection and preservation of historic and cultural features*

**Natural Resources, Open Space, Protection of Environmentally Sensitive Lands, and the Environment:** Identify, designate, and conserve resources, and protect open space and environmentally sensitive land.

*Discussion: or mapped agricultural lands north and south of Stewart Road would reduce the use in the city but is not considered of long-term commercial significance. See discussion under Agriculture above.*

*Under all alternatives, land along the White (Stuck) River would stay in public designation and use for trail and open space and habitat restoration purposes. Alternatives 1, 2, and 3 would convert the golf course for employment uses and reduce the amount of public open space. Alternative 4 would retain the golf course but would change the use of the City owned agricultural land for employment purposes. These changes are consistent with City’s parks level of service but would change the City’s open space goals (see the discussion of the Sumner Comprehensive Plan below). Alternative 5 would retain the golf course; however, since fall 2013 the golf course has suspended operations following surplus.*

*Critical area and shoreline regulations as well as stormwater regulations would guide development. Land in Alternative 4 would be potentially more constrained and less developable.*

*All alternatives would contribute to greenhouse gas emissions with the Action Alternatives 1, 2, and 3 creating the larger increases compared to Alternative 5 (No Action). Alternative 4 has the least greenhouse gas emissions. Under any of the Action Alternatives, the City proposes some M-1 code amendments and incentives to reduce future emission levels below a threshold recommended by Ecology.*

**Rural Areas:** Recognize the importance of rural lands and rural character.

*Discussion: All alternatives address land in the city limits. This policy is not applicable.*

**Essential Public Capital Facilities of a Countywide or Statewide Significance:** Include a process for identifying and siting essential public facilities such as airports, state education facilities, state or regional transportation facilities, state and local correctional facilities, solid waste handling facilities, and inpatient facilities, including substance abuse facilities, mental health facilities and group homes.

*Discussion: None of the alternatives address essential public facilities. This Countywide Planning Policy is not applicable.*

**Transportation Facilities and Strategies:** Encouraging efficient multi-modal transportation systems based on regional priorities and coordinated with local comprehensive plans.

*Discussion: All alternatives would add traffic to the road system, but would be required to meet City concurrency standards. The traffic model tests the City's planned improvements in its Comprehensive Plan and TIP. See also Community and Urban Design.*

**Urban Growth Areas, Orderly Development, and Provision of Urban Services:** Encouragement of development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner, reduction of sprawl and the provision of adequate public facilities and services necessary to support urban development at the time the development is available for occupancy and use; designate an "urban growth area" (UGA) or areas within which urban growth shall be encouraged and outside of which growth shall occur only if it is not "urban" in character; establish growth targets consistent with the requirements of the Growth Management Act; Centers will become focal points for growth within the county's UGA and will be areas where public investment is directed. Per Ordinance 2011-36s, net growth allocations to the city limits for the 2008-2030 period are as follows: Population 2,910; housing: 1,770; and employment: 9,307. Each community is to provide sufficient land capacity to achieve the growth targets.

*Discussion: All alternatives would support growth in urban areas, the Sumner city limits. Under all alternatives future development in the study area would be required to meet City service and infrastructure standards.*

*The City conducted a capacity analysis in 2010 (City of Sumner 2010) that has been adapted for use in this SEIS. Results of the analysis show the No Action Alternative 5 is below capacity on population, housing units and jobs. Considering the capacity of the City and UGA combined, the City's population and housing capacity would be sufficient, but the job capacity would continue to be a little low.*

*With the Action Alternatives, there would be more than sufficient capacity for jobs in the city limits, particularly with Alternatives 1, 2, and 3 that assume the golf course would convert to Light Industrial uses. Alternative 4's job capacity would slightly exceed the growth target. City capacity estimates show population and housing capacity would not meet the targets under Alternatives 1, 2, and 4. Alternative 3 with the greater HDR area would allow for enough population to meet the population target and come close to the housing target.<sup>3</sup>*

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<sup>3</sup> Pierce County is in the process of updating its Buildable Lands Analysis. Preliminary results for the 2010-2030 period (pers com, Jessica Gwilt and Ryan Windish, February 4, 2014) indicate the city limits have more housing capacity sufficient to meet the target (nearly 870 units more capacity than City estimates), but those results are being reviewed for accuracy. County job capacity estimates are similar to the City's though for 2010-2030 period rather than 2008-2030 period; County results indicate the city limits have a capacity below the target (nearly 495 job deficit). The City and County will continue to refine the Buildable Lands Analysis, and results would be considered in the City's Comprehensive Plan Update. In any case, given the focus of the docket application and alternatives on jobs – both the City's and County's results are similar, i.e. that the City has a small job capacity deficit under the No Action Alternative 5 and the Alternatives 1, 2, and 3 would more than meet the deficit. Alternative

**Exhibit 3-21. Base Year, Growth Targets, and Land Capacity**

**a. Base Year and Growth Targets**

Demographic	Base Year: 2008			Targets		
	PC-UGA			City 2030	PC-UGA	
	City [1]	[2]	Total	[1]	2030 [2]	Total 2030
Population Gross	9,060	1,344	10,404	11,970	2,484	14,454
Population Net				2,910	1,140	4,050
Housing Units Gross	3,973	512	4,485	5,743	1,042	6,785
Housing Units Net				1,770	530	2,300
Employment Gross	10,828	418	11,246	20,135	597	20,732
Employment Net				9,307	179	9,486

**b. No Action Land Capacity**

Demographic	No Action Alternative 5 with Original UGA					
	PC-UGA			Diff 2030	Diff 2030	Diff 2030
	City [3]	[4]	Total	City	PC-UGA	Total
Population Gross	11,879	3,558	15,437	(91)	1,074	983
Population Net	2,819	2,214	5,033	(91)	1,074	983
Housing Units Gross	5,281	1,518	6,799	(462)	476	14
Housing Units Net	1,308	1,006	2,314	(462)	476	14
Employment Gross	19,958	597	20,555	(177)	0	(177)
Employment Net	9,130	179	9,309	(177)	0	(177)

**c. Action Alternatives Land Capacity**

Demographic	Alt 1	Alt 2	Alt 3	Alt 4	Alt 1	Alt 2	Alt 3	Alt 4
	Diff 2030							
	City	City	City	City	Total	Total	Total	Total
Population Gross	(91)	(177)	813	(91)	983	897	1,887	983
Population Net	(91)	(177)	813	(91)	983	897	1,973	983
Housing Units Gross	(462)	(501)	(51)	(462)	14	(25)	425	14
Housing Units Net	(462)	(501)	(51)	(462)	14	(25)	425	14
Employment Gross	3,187	3,080	2,979	125	3,187	3,080	2,979	125
Employment Net	3,187	3,080	2,979	125	3,187	3,080	2,979	125

Source: City of Sumner 2010, Pierce County 200, BERK Consulting 2014.

[1] Excludes mobile and work at home jobs.

[2] UGA Employment calculated based on land use and 19.37 employee per acre.

[3] With HDR at 12 du/ac. Assumes Fleishmann Property as industrial Use rather than mixed use.

[4] Excludes Orton Junction UGA expansion, Retains Eastern UGA.

4 would fill the job capacity deficit based on the City’s analysis but not quite overcome the County’s slightly higher projected deficit.

General Note: Results are based on the city limits as of 2010 and the UGA boundary without changes as of 2010 (i.e. no southern UGA expansion and no eastern UGA retraction evaluated in 2010). Since the Sumner Meadows Docket SEIS scoping was initiated in fall 2013, the City has withdrawn its court appeal of the Orton Junction UGA boundary expansion and East Hill UGA retraction originally approved by the City and County but denied by the Growth Management Hearings Board. Further, the 2011 SEIS for the Fleishmann property reviewed mixed use and industrial alternatives; in early 2014 a development application has proposed industrial uses. For results with and without the Orton Junction and Fleishmann property assumptions, see Appendix B.

### **Sumner Vision and Comprehensive Plan Elements**

**Vision Statement:** The Sumner Vision Statement includes broad references to open space, agriculture, and employment in the following excerpts:

- In 2024, Sumner shows strongly its unique "small town" characteristics and appeal even in the face of a changing world. Through ongoing cooperation and communication between citizens, business, industry, schools, and local government, an environment exists which reflects the community's pride in itself. This environment embodies our agricultural heritage, our desire for open space, our promotion of quality education, our community interaction, and our readiness for the future.
- In order to maintain this environment our community upholds responsible commitments in planning for our physical layout, the character of our residential districts, our growth patterns, the maintenance of our parks and recreational commitments, our continued economic development, and responsible governance.
- ...New parks, recreational areas, greenbelts, and buffers have been added to the landscape of the City to define the various districts as well as provide open space and recreational opportunities.
- Planned industrial and commercial areas are encouraged and should utilize landscaping and other forms of buffering to ensure compatibility with surrounding neighborhoods.

*Discussion: The Vision encompasses the whole City and is not specific to the study area; the City is to balance and weigh the Vision Statement. All Alternatives would promote continued economic development. While open space and recreation area would diminish under Alternatives 1, 2, and 3, and agricultural use would diminish under Alternative 4, the City would retain land important for habitat, open space, and recreation along the White (Stuck) River. In the remainder of the City the watersheds, schools, and parks would continue to provide open space, parks, and recreation. Under Alternative 5, the Vision Statement would still apply.*

**Land Use Element/Plan:** The Comprehensive Plan includes a Land Use Map and text describing the use of land. Most relevant to the Sumner Meadows Docket and Alternatives include the following:

- **PUBLIC AND PRIVATE FACILITIES AND UTILITIES:** The purpose of this designation is to identify lands utilized to provide public and private utilities, facilities, and services. Allowable uses include parks, schools, medical facilities, non-profit service uses/organizations, public and private utilities, and government buildings. Proposed parks are indicated in the Parks Plan. (page 48)
- **Public and Private Facilities and Utilities:** The primary purpose of this designation is to identify lands utilized to provide public and private utilities, facilities, and services. A secondary purpose of this designation is to allow manufacturing and industrial uses in specific areas as provided in the underlying zoning. Allowable uses include parks, schools, medical facilities, non-profit service uses/organizations, public and private utilities, and government buildings, as well as manufacturing and industrial uses in specific locations. Portions of the area designated as Public and Private Facilities and Utilities are located within the manufacturing/industrial center identified in Figure 4A. Proposed parks are indicated in the Parks Plan. (Page 50)

- **Agriculture:** The purpose of this designation is to protect agricultural uses, promote the conservation of productive agricultural activities and operations, and to maintain large areas free of impervious surfaces to allow for natural infiltration to groundwater resources. Principal uses include agriculture, floriculture, horticulture, general farming, dairying, poultry raising, stock raising, kennels and other agricultural uses as well as cultivation of forest products or crops. Secondary uses include single-family residences, produce stands, utilities subject to compatibility criteria, and residential structures for employees.
- **General Commercial:** This designation is applied to areas outside the CBD and urban villages where retailing, commercial, and office uses serving a larger market are promoted. While the uses accommodate automobiles to a greater degree, buildings with a street orientation, screened parking, and ample landscaping ensure more attractive centers. Primary uses include retail businesses, automotive sales, professional offices, hospitals, medical clinics, hotels, theaters, restaurants, personal service shops. Secondary uses include automotive service stations, convenience stores, utilities subject to compatibility criteria, and light manufacturing, assembling, and repairing. General commercial uses may occur in different forms to encourage specific uses. For example, areas around hospitals may have provisions encouraging medical service and pedestrian access; or retail or commercial uses near large employment centers may be limited to commercial uses to support workers. Limited multi-family residential uses may be incorporated (e.g. on second floors above retail) where it can be integrated into the proposed development and is compatible with the surrounding neighborhood. Existing general commercial areas will be encouraged to incorporate pedestrian-oriented elements and positive design features such as additional landscaping, reduced front setbacks, screened parking, and pedestrian scale lighting and signage. New general commercial areas will require design review to ensure these goals are met and a balance in the accommodation of all transportation modes including transit and pedestrians is achieved.
- **Urban Village:** Urban villages are self-contained, tightly gridded, mixed use areas with a seamless mix of residential, commercial, and civic uses. An urban village in Sumner would be different than an urban village in Seattle. In Sumner, an urban village would be something like a "mini- Downtown" and would respect the "small town character" of Sumner by ensuring buildings are of appropriate height and scale.

The urban villages will provide a focus for neighborhoods outside the CBD, but are secondary to the CBD. Urban villages promote pedestrian scale, transit-oriented developments in harmony with the character of the community. Primary uses include retailing and commercial services, banks (with no drive through facilities), professional offices, bed-and-breakfasts, hotels, civic uses, multi-family dwellings of various types including duplexes, townhouses, condominiums, apartments, etc. Secondary uses can include single-family dwellings, accessory units, adult family homes, day care, public and private educational facilities, utilities subject to compatibility criteria, churches and religious institutions, convalescent care and rest homes. Mixed uses, converted residential buildings, converted commercial buildings, and variable lot sizes are encouraged to ensure pedestrian orientation, visual interest, and historic character protection.

- **High Density:** This designation allows for higher density multi-family developments to allow for a broad range of housing choices in areas with existing and planned infrastructure, and to allow for infill development and the reduction of sprawl. Primary uses include multi-family housing of various types including townhouses, condominiums, apartments, etc. Secondary uses can include low and moderate density residential developments, adult family homes, day care, public and private educational facilities, utilities subject to compatibility criteria, churches and religious institutions, convalescent care and rest homes. This designation primarily applies to existing development that already is developed to this density level. This designation may be applied in new areas as appropriate to the neighborhood's character (e.g. near commercial areas). Proposed high density developments may occur where the following conditions exist:
  - An over-concentration of multi-family dwellings in a single area is avoided.

- A repetition of building forms is avoided in the proposed development.
- Design review will be required.
- Adequate public facilities exist to support the density.
- Manufacturing/Industrial Center Designation (Overlay): The Manufacturing/Industrial Center (MIC) Map (Figure 4A) designates the area that would be considered for high intensity industrial land uses for an employment and economic center both on a local, county, and regional level. This area will be characterized by light and heavy manufacturing uses, restrictions on retail uses, and a prohibition of residential uses in this area. The MIC will be targeted for infrastructure improvements to promote the industrial and economic development in the area.

*Discussion: The No Action Alternative 5 would retain the current Comprehensive Plan land use designations and text descriptions.*

*Under Action Alternatives 1, 2, and 3, there would be a redesignation of Public and Private Facilities and Utilities applicable to the golf course to Light Manufacturing. Under Alternative 4 there would be a redesignation of Public and Private Facilities and Utilities on the City-owned agriculture property to Light Manufacturing. Redesignation of lands classified Public and Private Facilities and Utilities to Light Manufacturing would be consistent with the broader planned Light Manufacturing land use in the valley.*

*Alternative 3 would apply Light Manufacturing consistently in the study area, except for the land south of Stewart Road where Urban Village with High Density Residential zoning would be applied. This designation allows a mix of uses, but the underlying zoning would provide a focus on High Density Residential. Residential uses are not prevalent in this area of the city limits and it would be surrounded by employment uses with a potential for land use conflicts, dependent on design and site planning.*

*Alternatives 1, 2, and 3, include a text amendment to amend the two descriptions of Public and Private Facilities and Utilities in order to have only one description.*

*If Alternative 4 is implemented, and the City-owned agriculture property is redesignated Light Manufacturing, the description of the Agriculture designation would require amendment to remove it since no other property has that designation. Other designations under Action Alternatives – General Commercial, Urban Village, High Density Residential, can be retained in the Comprehensive Plan text as they are applied elsewhere in the City.*

*The MIC Overlay is applied to a portion of the golf course Property but otherwise skirts around the study area. If Alternatives 1, 2, or 3 are implemented, the City could consider expanding the MIC Overlay as the area would be more intensively be used for employment and would contribute to MC employment goals.*

**Commuter Rail/Regional Transit Sub-Element:** The Comprehensive Plan includes a Commuter Rail/Regional Transit Sub-Element with the following policy promoting a new Sounder train station in the vicinity of the golf course to serve the MIC:

- 1.6 Plan for a train station at Stewart Road next to the golf course and adjacent to the northeastern boundary of the Sumner-Pacific MIC. The station would help connect high density housing centers with the proposed MIC, and may serve regional populations or function as secondary "skip-stop" stations.

*Discussion: Under Alternatives 1, 2, and 3 the golf course would become a Light Manufacturing designation, and accordingly Policy 1.6 should be amended to remove references to the golf course. Alternatives 4 and 5 would not require a change to the policy in terms of the golf course language. The policy could also be amended to reflect the status of the train station as appropriate.*

**Economic Development Element:** The Comprehensive Plan Economic Development Element includes a policy promoting the protection of natural amenities and open space to enhance the business environment.

- 2.1 Provide protection of natural amenities such as riparian corridors and vital open spaces for enjoyment by workers and to enhance the work and business environment.

*Discussion: Open space could be reduced under Alternatives 1, 2, 3 and 4 either due to the conversion of the golf course or the City-owned agricultural property. No change would occur under the No Action Alternative 5. Under all alternatives studied, land along the White (Stuck) River would stay in public designation and use for trail and open space and habitat restoration purposes. The White (Stuck) River open space corridor is intended to enhance the work environment with trails as well as provide riparian habitat.*

**Parks and Open Space:** The Parks and Open Space Element includes a number of policies regarding open space and agriculture:

- 1.13 Establish the levels of service provided in the Parks and Open Space Plan for park facilities.

*Discussion: All Alternatives are consistent with Policy 1.13 in that the levels of service in the Parks and Recreation plan do not require an amount of Golf Course or agriculture land.*

- 2.3 Protect agricultural activity and long-term commercially viable agricultural land.
  - 2.3.1 Maintain protections for reasonable agricultural practices to continue without threat of nuisance actions.
  - 2.3.3 Protect critical farmlands with compensatory programs such as purchase of development rights, transfer of development rights, clustering and fee purchase, where appropriate.

*Discussion: Policy 2.3 and associated objectives are intended to protect both agricultural activity and long-term commercially viable agricultural land. The conversion of the City-owned agricultural land under Alternative 4 or private lands mapped as agricultural resource under Alternatives 2 and 3 would reduce the use in the city. Alternatives 1, 2, 3, and 5 would not redesignate the City-owned agricultural land.*

- 2.7 Retain City owned lands, including excess rights-of-way for open space purposes. Unnecessary lands which are surplus should be provided with open space compensation as a part of the land sale.
- 2.9 Work with other jurisdictions to establish open space corridors and linkages with other significant regional open spaces including the valley hillsides, Puyallup/White (Stuck) River corridors, and the valley south of the City.

*Discussion: The Golf Course was surplus in 2013. Under all alternatives the City is retaining ownership of land along the White (Stuck) River for habitat, open space, and recreation purposes.*

- 2.10 Establish an open space standard of 35% for the entire City. Land use regulations and other programs should be developed to maintain this standard on a city-wide level. Open space should refer to those areas of planted surface which provide substantial open space value.

*Discussion: Alternatives 1, 2, and 3 would reduce the amount of open space by about 154 acres. This is three-quarters of the City's inventory of parkland (202 acres); however a level of service has not been established for a golf course. In view of the Comprehensive Plan Public and Private Facilities and Utilities designation in the City and UGA, which totals around 232 acres within the City's UGA and 620 Acres within City limits for a total of 852 acres, redevelopment of the golf course would reduce the land use designation by about 18%. This total acreage includes the City owned watersheds, cemetery, and Cascade Water Alliance land along the east hill as well as schools. Alternative 4 would reduce open space by about 93*

acres<sup>4</sup>; it would not reduce the City’s parkland inventory but it would reduce Public and Private Facilities and Utilities designation just under 10%. Under any of the Action Alternatives 1, 2, 3, and 4, the policy would require amendment to either remove or change the percentage open space. Alternative 5 (No Action) would not require amendments.

**Transportation:** Transportation Element Figures 16 and 17, Major Pedestrian System Plan and Bicycle and Trail System Plan, respectively, show the Sumner Meadows Golf Links as a landmark on the maps.

*Discussion:* Under Alternatives 1, 2, and 3, the maps should be revised to remove the reference to the Sumner Meadows Golf Links. No changes are needed for Alternatives 4 and 5.

**Sumner Zoning Code**

Action Alternatives 1, 2, 3, and 4 would require changes to zoning to match the Comprehensive Plan. Alternative 5 (No Action) would not require a change.

- Alternative 1: Current zoning on most of the golf course M-1 (Light Industrial), would be consistent with the proposed Comprehensive Plan Map changes and would not change. Areas that are inconsistent would be changed to be consistent with the M -1, Light Manufacturing land use designation on the Comprehensive Plan Map. Approximately 28 acres would be rezoned from GC to M-1.
- Alternative 2: Implementing zoning would be M-1.
- Alternative 3: Implementing zoning would be M-1. Property west of the golf course owned by Six Kilns Apartments LLC would be designated as Urban Village and zoned as HDR.
- Alternative 4: Implementing zoning would be M-1.

Applying zoning consistent with the Comprehensive Plan achieves compatibility under all alternatives.

It should be noted, the Air Quality mitigation measures would result in the addition of requirements and incentives for energy efficiency and similar measures to achieve greenhouse gas reductions. See section 3.2.

**Sumner Shoreline Master Program**

All alternatives would be subject to the use standards and shoreline development regulations in the SMP, including a 100 foot setback along part of the golf course to 16<sup>th</sup> Street, and 200 feet on the balance of the White (Stuck) River. None of the alternatives propose water-oriented uses; however, water-oriented recreation and habitat would be retained along the shoreline under all alternatives.

**3.6.3 Mitigation Measures**

**Incorporated Plan Features**

- Alternatives 1, 2, and 3 would amend the Comprehensive Plan text, policies and map to: 1) reduce text conflicts including the two descriptions of the Public and Private Facilities and Utilities, 2) remove conflicts with references to the golf course, and 3) adjust policies on open space retention to recognize the future redevelopment of the study area.
- Under any of the Action Alternatives, the City would adopt M-1 code amendments and incentives to reduce future emission levels below a threshold recommended by Ecology. See the Section 3.2 of this SEIS.

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<sup>4</sup> The reclassification of Public and Private Facilities and Utilities would equal about 108 acres but about 93 acres are actually in City ownership.

***Applicable Regulations and Commitments***

- The Sumner Municipal Code includes zoning and design standards intended to allow for compatible development.

***Other Potential Mitigation Measures***

- Under Alternatives 2, 3, and 4, some mapped agricultural resource lands would convert to employment uses consistent with zoning and surrounding lands.
- If Alternative 4 is implemented, and the City-owned agriculture property is redesignated Light Manufacturing, the description of the Agriculture designation would require amendment to remove it since no other property has that designation.
- The City could pursue additional service from Pierce County Transit based on additional trips.

**3.6.4 Significant Unavoidable Adverse Impacts**

All alternatives are generally consistent with GMA goals and the City’s Vision, but there are differences in emphasis. All alternatives would emphasize economic development goals, particularly Alternatives 1, 2, and 3. All Action Alternatives would reduce the City’s percentage of open space goals and policies, but would not conflict with the Parks and Open Space Plan levels of service standards and would retain open space along the White (Stuck) River. All alternatives would promote growth in the city limits and would be subject to City critical area, shoreline, stormwater, public service and infrastructure requirements. The City will weigh and harmonize the goals.

With implementation of Alternative plan and zoning amendments and mitigation measures, plan and policy consistency would be achieved under any of the Action Alternatives.

## 3.7 Transportation

This chapter describes the existing transportation system in the vicinity of the proposal study area (Exhibit 3-22, Chapter 2) and the future transportation conditions that are expected citywide with the docket alternatives. Exhibit 3-22 shows the transportation analysis area, which includes the 16 citywide intersections included in the City's previous Comprehensive Plan analyses, as well as 11 additional intersections located in the proposal study area (bounded by Stewart Road SE, 24<sup>th</sup> Street E, East Valley Highway, and West Valley Highway, including some intersections in Pierce County and the Cities of Pacific and Auburn). For long-term planning purposes, the City assesses its roadway system based on the weekday PM peak hour operations of designated major intersections; therefore, the effect of proposed development on all of the designated intersections is evaluated at that period. The weekday PM peak hour is analyzed because it is the period in which the highest citywide traffic volumes typically occur. Vehicle traffic that is expected to result from each alternative is analyzed cumulatively with traffic from other planned regional growth. Because the proposal is a non-project action that would result in a change in land use designation, the transportation analysis is programmatic in nature. It focuses on the potential effects of the proposal on the long-range transportation plan that the City has adopted to support planned future land use, which is established in the current transportation element of the Sumner Comprehensive Plan (City of Sumner 2012). Future conditions are analyzed for year 2030, which is the long-range planning year defined for the City's Comprehensive Plan.

### 3.7.1 Affected Environment

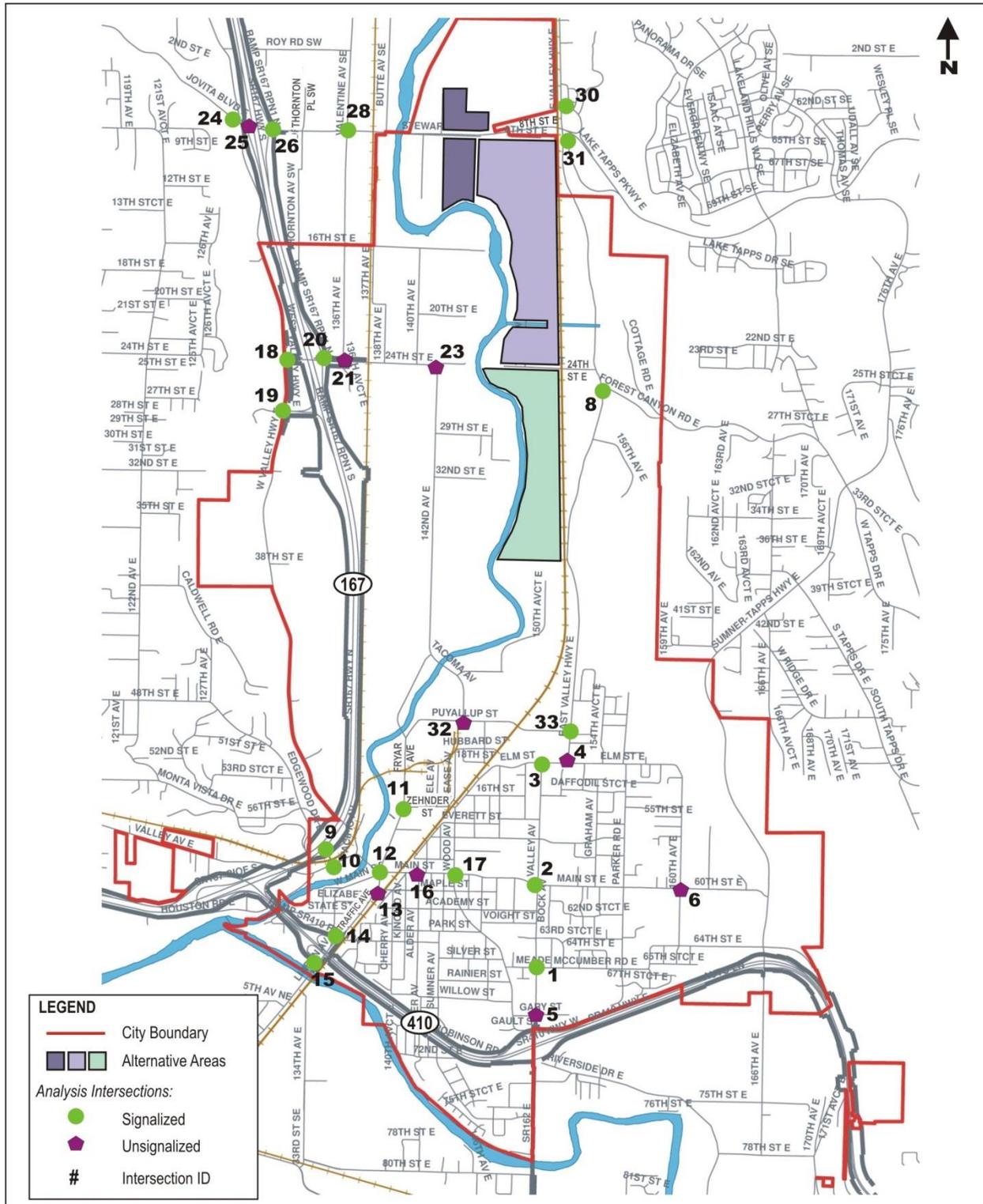
This section describes existing transportation facilities within the proposal study area, including roadways, transit, pedestrian and bicycle facilities.

#### *Existing Roadway Network*

Roadways are designated with functional classifications that reflect their intended mobility and access functions. The classification system allows the application of appropriate design and maintenance standards, and guides the programming of roadway improvements. Exhibit 3-23 shows the existing functional classifications of the City's roadways (Washington State Department of Transportation [WSDOT] 2009), described as follows.

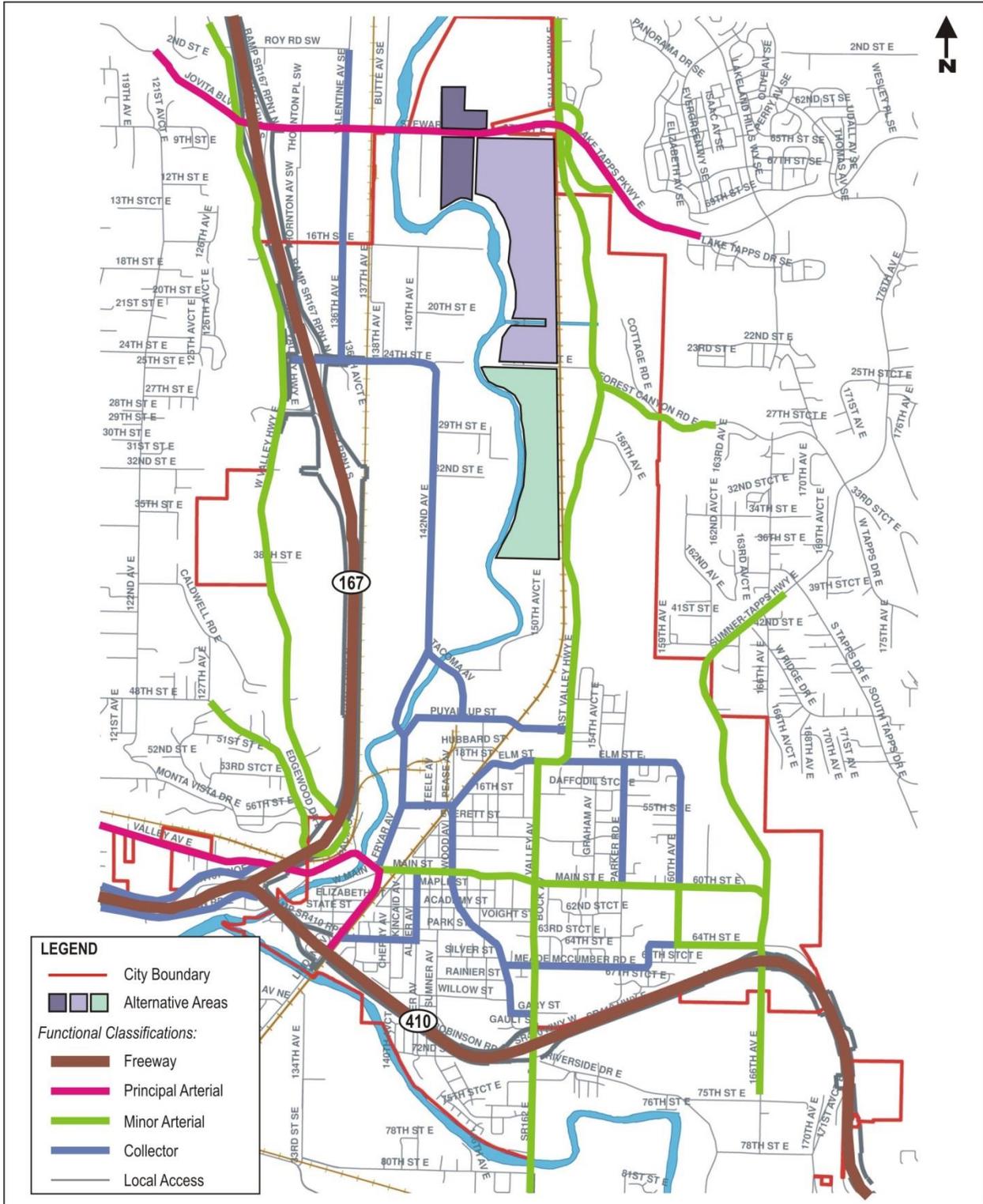
- **Freeway** – Multi-lane, high-speed, high-capacity road intended exclusively for motorized traffic. All access is controlled by interchanges and road crossings are grade-separated.
- **Principal Arterial** – Road that connects major activity centers and facilities, typically constructed with limited direct access to abutting land uses. The primary function of principal arterials is to provide a high degree of vehicle mobility, but they may provide a minor amount of land access. Principal arterials serve high traffic volume corridors, carrying the greatest portion of through- or long-distance traffic within a city, and serving inter-community trips.
- **Minor Arterial** – Road that connects centers and facilities within the community and serves some through-traffic, while providing a greater level of access to abutting properties. Minor arterials connect with other arterial and collector roads, and serve less concentrated traffic-generating areas. Although the dominant function of minor arterials is the movement of through-traffic, they also provide for considerable local traffic with origins or destinations at points along the corridor.
- **Collector** – Road designed to fulfill both functions of mobility and land access. Collectors typically serve intra-community trips between activity centers, while also providing a high degree of property access within a localized area. These roadways “collect” vehicular trips from local access streets and distribute them to higher classification streets.
- **Local Access** – Road with a primary function of providing access to residences or businesses. Typically, they are only a few blocks long, are relatively narrow, and have low speeds. Local access streets make up the majority of the miles of roadway in the city.

Exhibit 3-22. Analysis Intersections



Source: City of Sumner 2011; Heffron Transportation 2014

Exhibit 3-23. Roadway Functional Classifications



Source: WSDOT 2009; Heffron Transportation 2014

### CITY STREETS

The following major roadways are located within the proposal study area:

**Stewart Road SE** is an east-west principal arterial. Between 140<sup>th</sup> Avenue Court E and the Auburn city limits it has five lanes with curbs, gutters, and sidewalks on both sides. West of 140<sup>th</sup> Avenue Court E, it is a two-lane roadway with narrow shoulders, and auxiliary turn lanes at some intersections. It has northbound and southbound on- and off-ramps at the State Route (SR) 167 interchange. This roadway becomes Jovita Boulevard E west of West Valley Highway and becomes Lake Tapps Parkway E east of East Valley Highway. Access to East Valley Highway is a grade separated interchange. It has a speed limit is 35 miles per hour (mph).

**24<sup>th</sup> Street E** is an east-west roadway. East of 142<sup>nd</sup> Avenue E it is a five-lane collector with curbs, gutters, and sidewalks on both sides of the street. It has a segment to the east of 142<sup>nd</sup> Avenue that is a two-lane local access street, terminating just west of the White (Stuck) River. Currently there is only a pedestrian crossing along the 24<sup>th</sup> Street corridor across the White (Stuck) River, with an additional local access road segment between the river and East Valley Highway. It has northbound on- and off-ramps at SR 167. Between 136<sup>th</sup> Avenue E and 142<sup>nd</sup> Avenue E, 24<sup>th</sup> Street E has a speed limit of 35 mph; to the east and west of this segment the speed limit is 25 mph.

**West Valley Highway E** is a north-south minor arterial. In the vicinity of Sumner, it is located adjacent and roughly parallel to SR 167. It has southbound on- and off-ramps at SR 167 just south of 24<sup>th</sup> Street E. Between 24<sup>th</sup> Street E and the SR 167 southbound ramp intersection, it is a four-lane roadway; to the north and south of this segment it is has two lanes. There are paved shoulders of varying widths on both sides of the roadway. It has a speed limit of 35 mph.

**Valentine Avenue SE/136<sup>th</sup> Avenue E** is a two-lane north-south collector. Between Stewart Road SE and 16<sup>th</sup> Street E it has intermittent curbs, gutters, and sidewalks. To the north and south of this segment there are no curbs, gutters, or sidewalks. It has a speed limit of 30 mph to the south of 16<sup>th</sup> Street E and 35 mph to the north.

**East Valley Highway E** is a north-south minor arterial. For most of its length within Sumner it is a two-lane roadway with no curbs, gutters, or sidewalks, though widens to three lanes about ½ mile north of Elm Street. It has a speed limit of 35 mph to the north of Salmon Creek and 25 mph to the south.

**142<sup>nd</sup> Avenue E** is a five-lane, north-south collector. It has curbs, gutters, and sidewalks on both sides of the street. It serves as the primary north-south arterial route between north and central Sumner. It has a speed limit of 35 mph.

### STATE HIGHWAYS

Regional access to Sumner is provided via SR 167 and SR 410. **SR 167** is a four-lane freeway. To the south and west, it connects to Puyallup and Tacoma. To the north, it connects to Auburn, Kent, and Renton. It provides primary highway access to and from the proposal study area, with interchanges at Stewart Road SE and 24<sup>th</sup> Street E/West Valley Highway.

**SR 410** provides connection between SR 167 in Sumner and the cities of Bonney Lake, Buckley, and Enumclaw to the east. SR 410 also is a major connector to Mount Rainier National Park to the southeast. Within Sumner, it is a four-lane freeway with interchanges at Sumner Tapps Highway, Valley Avenue, and Traffic Street.

In 1998, the Washington State Legislature enacted legislation for Highways of Statewide Significance (HSS), codified as RCW 47.06.140. HSS facilities support significant statewide travel and economic linkages. The legislation emphasizes that these significant facilities should be planned from a statewide perspective. While local jurisdictions should assess the effects of local land use plans on HSS facilities, they are exempt from local operational standards. SR 167 is designated as an HSS facility.

Any state highways that are not designated as HSS facilities are considered Highways of Regional Significance (HRS). SR 410 and SR 162 (Valley Avenue) are designated as HRS facilities.

EXISTING ROADWAY OPERATIONS

Level of service (LOS) analysis was performed at the study area intersections for the PM peak hours. Level of service is a qualitative measure used to characterize traffic operating conditions. Six letter designations, “A” through “F,” are used to define level of service. LOS A and B represent conditions with little or no delay, and LOS C and D represent intermediate traffic flow with some delay. LOS E indicates that traffic conditions are at or approaching congested conditions and LOS F indicates that traffic volumes are at a high level of congestion with unstable traffic flow.

Existing levels of service for the study area intersections were analyzed using methodologies presented in the Highway Capacity Manual (Transportation Research Board, 2000). All level of service calculations were performed with Trafficware’s Synchro 8.0 analysis software. Intersection analysis was completed using Highway Capacity Manual 2000 methods, for consistency with the City’s previous Comprehensive Plan analyses.

Level of service for intersections is defined in terms of average delay per vehicle in seconds. For a signalized or all-way stop-controlled intersection, level of service is based upon average delay for all vehicles traveling through the intersection. The level of service for a one- or two-way stop-controlled intersection is determined by the average delay for each minor (stop-controlled) movement. Delay is related to the availability of gaps in the major street's traffic flow, and the ability of a driver to enter or pass through those gaps. Exhibit 3-24 shows the level of service criteria for signalized and unsignalized intersections, as defined in the Highway Capacity Manual. Stop-controlled intersections have different level of service threshold values than signalized intersections, primarily because drivers expect different levels of performance from different types of transportation facilities. In general, stop-controlled intersections are expected to carry lower volumes of traffic than signalized intersections. Therefore, for the same level of service, a smaller amount of delay is acceptable at stop-controlled intersections than for signalized intersections.

**Exhibit 3-24. Intersection Level of Service Criteria**

Level of Service	Average Delay Per Vehicle		General Description
	Signalized	Unsignalized	
A	≤ 10.0 seconds	≤ 10.0 seconds	Free flow
B	10.1 – 20.0 seconds	10.1 – 15.0 seconds	Stable flow with slight delay
C	20.1 – 35.0 seconds	15.1 – 25.0 seconds	Intermediate flow with some delay
D	35.1 – 55.0 seconds	25.1 – 35.0 seconds	Intermediate flow with increasing delay
E	55.1 – 80.0 seconds	35.1 – 50.0 seconds	Unstable flow, approaching congested conditions
F	> 80.0 seconds	> 50.0 seconds	Forced flow

Source: Transportation Research Board, 2000.

Per Transportation Element Policy 3.1, the City of Sumner has adopted a standard of LOS D for arterials and collectors within the city except the intersections of Traffic Avenue/Main Street and Alder Avenue/Main Street, which are identified as LOS F. In addition, per Transportation Element Policy 3.3, exceptions to concurrency are also made for the following locations until improvements identified in its Comprehensive Plan Transportation Element are funded and constructed (City of Sumner 2012):

- On SR 167 (a designated HSS) or its interchanges
- On SR 410, SR 162, or the three interchanges of SR 410 state highways serving the City (Traffic Avenue, SR 162, and Sumner-Tapps Highway)
- East Valley Highway/Forest Canyon Road
- East Valley Highway/Stewart Road

- Pacific Avenue/West Valley Highway corridor or Bridge Street

For the purpose of this SEIS analysis, transportation deficiencies are identified if an intersection is currently or projected to operate at LOS E or F, unless it has been specifically exempted by City policy.

Exhibit 3-25 summarizes existing levels of service of the intersections in the proposal study area that have not been previously evaluated for the City’s Comprehensive Plan. As shown, the SR 167 southbound ramp/Stewart Road SE intersection is currently operating at LOS F. All other study intersections in the proposal study area are currently operating at LOS C or better.

**Exhibit 3-25. Existing Level of Service in Proposal Study Area – PM Peak Hour**

	<b>Intersection</b>	<b>Jurisdiction</b>	<b>LOS<sup>1</sup></b>	<b>Delay<sup>2</sup></b>
<b>Signalized<sup>3</sup></b>				
18	West Valley Highway/24 <sup>th</sup> Street E	Sumner	B	10.5
19	West Valley Highway/SR 167 SB ramps	Sumner/WSDOT	B	16.6
20	SR 167 NB ramps/24 <sup>th</sup> Street E	Sumner/WSDOT	A	9.9
24	West Valley Highway/Jovita Boulevard E	Pierce County	C	27.6
26	SR 167 NB ramps/Stewart Road SE	Pacific/WSDOT	B	17.7
28	Valentine Avenue SE/Stewart Road SE	Pacific	C	26.3
30	East Valley Highway/Terrace View Drive SE	Auburn	B	11.9
31	East Valley Highway/East Valley Access Road	Auburn	A	9.3
<b>One- or Two-Way Stop Controlled<sup>4</sup></b>				
21	136 <sup>th</sup> Avenue E/24 <sup>th</sup> Street E	Sumner	C	21.6
23	142 <sup>nd</sup> Avenue E/24 <sup>th</sup> Street E	Sumner	B	10.9
25	SR 167 SB ramps/Stewart Road SE	Pacific/WSDOT	F	>200

Source: Heffron Transportation, Inc. 2014.

1. LOS = Level of Service
2. Delay = Average Delay in Seconds per Vehicle
3. Level of service for signalized intersections is based upon the average delay of all movements through the intersection.
4. Level of service for one- or two-way stop-controlled intersections is based upon the average delay of the most congested movement through the intersection.

**Freight Movement**

WSDOT has established the Washington State Freight and Goods Transportation System (FGTS) to classify state highways, county roads, and city streets according to the freight tonnage they carry. There are five freight categories, ranging from T-1 to T-5, depending on the annual tonnage of freight that that a roadway carries, summarized in Exhibit 3-26 (WSDOT, 2013a). WSDOT considers all T-1 and T-2 corridors to be part of the statewide strategic freight network (WSDOT, 2013b).

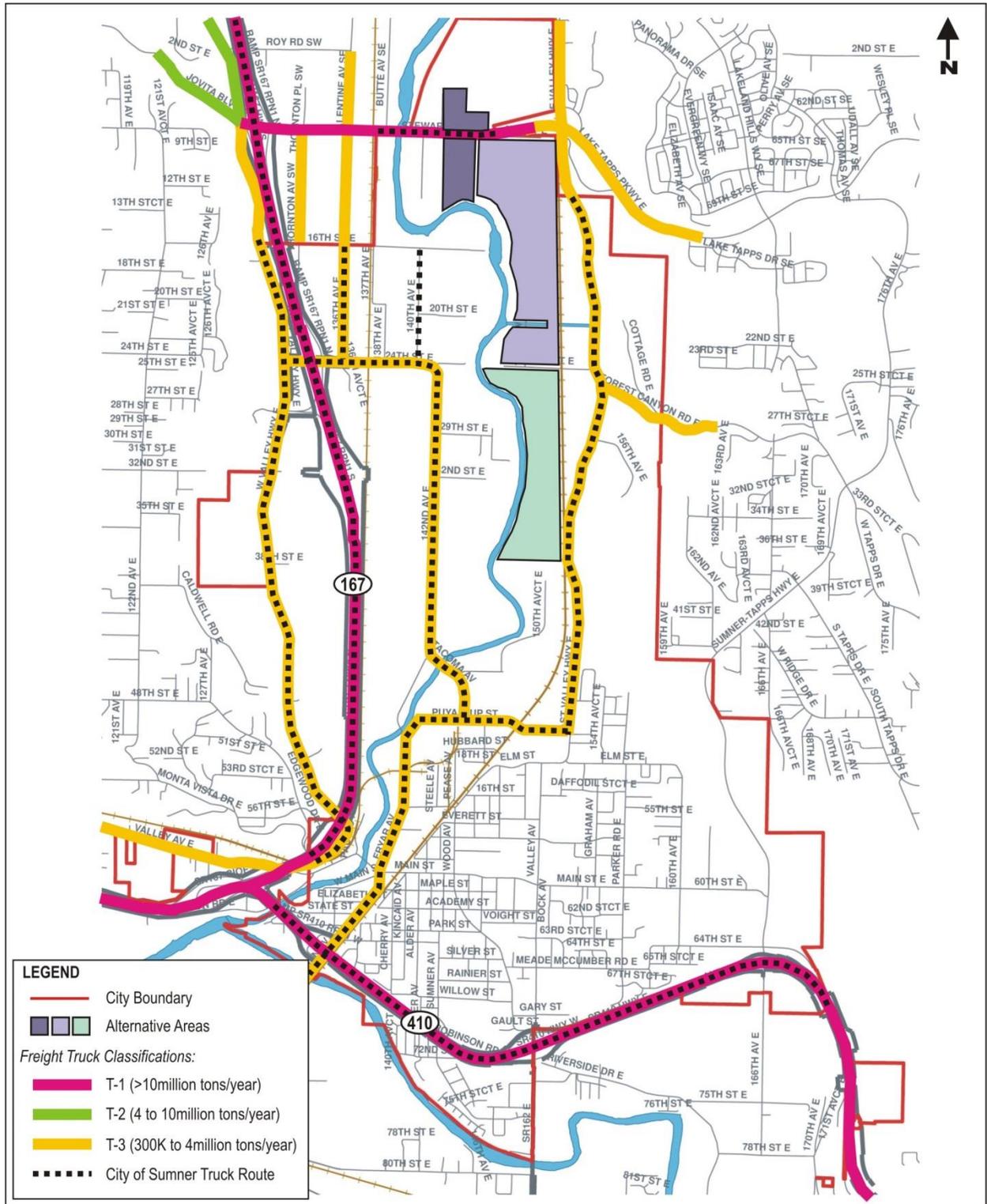
**Exhibit 3-26. FGTS Freight Categories**

<b>FGTS Category</b>	<b>Freight Tonnage Carried on Roadway</b>
T-1	Over 10 million tons per year
T-2	4 million to 10 million tons per year
T-3	300 thousand to 4 million tons per year
T-4	100 thousand to 300 thousand tons per year
T-5	Over 20 thousand tons in 60 days

Source: WSDOT, 2013a

Exhibit 3-27 shows the FGTS classifications of the roadways within and near Sumner (WSDOT, 2013a), as well as the streets within the city limits that have been identified by the City as truck routes (City of Sumner, 2008). As shown, SR 167, SR 410, and Stewart Road SE have T-1 classifications. West Valley Highway north of Stewart Road SE and Jovita Boulevard E west of West Valley Highway both have T-2 classifications. The remaining FGTS-classified roadways within the study area have a T-3 designation. The City-designated truck routes generally align with the WSDOT-designated T-1 and T-3 routes.

Exhibit 3-27. Study Area Freight Routes



Source: WSDOT 2013a; City of Sumner 2008.

***Transit and Non-Motorized***

Sound Transit provides both fixed-route bus and Sounder commuter rail service to the downtown area of Sumner. Sounder provides weekday service between Lakewood and Seattle. Sound Transit bus Route 578 provides service between Puyallup and Downtown Seattle seven days a week. The Sounder rail station is located at 810 Maple Street and the bus stop for Route 578 is adjacent to the station. There is currently no transit service in the proposal study area.

In the proposal study area, sidewalks are intermittent and exist primarily where they have been included as frontage improvements or as part of roadway-segment or intersection improvement projects. In the downtown area, the sidewalk system is more comprehensive. There is an existing trail located along the west side of the Golf Course. It continues to the south with an alignment that is adjacent to the White (Stuck) River. In the north portion of the city in the proposal study area, the City has also designated some roadway segments that include sidewalks as part of its trail system. These include Stewart Road SE to the east of 140<sup>th</sup> Avenue Court E, 24<sup>th</sup> Street E between SR 167 and 142<sup>nd</sup> Avenue E, and 140<sup>th</sup> Avenue E between 16<sup>th</sup> Street E and 24<sup>th</sup> Street E (City of Sumner 2013a).

**3.7.2 Impacts*****Transportation Analysis Method*****TRAVEL DEMAND FORECASTING**

Roadway operational analysis for projected year 2030 conditions was performed using traffic forecasts generated by the City of Sumner's travel demand forecasting model. The model forecasts future traffic volumes for use in long-range comprehensive planning.

The City's model employs the traditional travel demand forecast modeling process. The roadway network is represented as a series of links (roadway segments) and nodes (intersections), and the model area is divided into Transportation Analysis Zones (TAZs). For the TAZs in which the alternatives are located, land use assumptions are based upon the land use defined for each alternative (described in the following section). Outside of the TAZs where the alternatives are located, future land use characteristics are quantified based upon adopted City of Sumner future land use plans and future growth in adjacent communities based on regional growth forecasts. Trips generated by the planned future land uses are calculated using statistical data on population, household, and employment characteristics. The trips are distributed onto the modeled roadway network using an assignment process that accounts for the effect of increasing traffic volumes and congestion on travel times and routes. The resulting forecasts consist of traffic volumes projected for each modeled roadway segment and analysis intersection.

The future-year model roadway network incorporates the City's current long-range transportation improvement program (City of Sumner, 2004, 2011), with the exception of future improvement projects identified for state routes (SR 162, SR 167, and SR 410, except for a traffic signal and turn lanes included for SR 410/166th Avenue E eastbound ramp intersection). These potential improvements were not assumed in place because WSDOT has previously indicated that it is not likely they will be built by the current long-range planning year of 2030 (City of Sumner 2011). At Valentine Avenue SE/Stewart Road SE, the future network assumes the addition of turn lanes planned to be constructed as part of the City of Pacific's 136<sup>th</sup> Avenue E\Valentine Avenue SE Corridor Improvement Project (City of Pacific, 2013).

The City's current TIP includes a corridor study that would evaluate the extension of 24<sup>th</sup> Street E to the east across the White (Stuck) River, improving it as an arterial between 142<sup>nd</sup> Avenue E and East Valley Highway, and providing a south connection to the Golf Course site (City of Sumner, 2013b). Although the corridor study is included in the TIP, the actual improvement of 24<sup>th</sup> Street E is not. Therefore, it was not assumed to be in place for Alternative 5 (No Action). However, if the City were to move forward with build-out of any of the Action alternatives, completion of the 24<sup>th</sup> Street E extension to provide a south connection between the project site and the City's

roadway network would be necessary. Therefore, extension of 24<sup>th</sup> Street E to a project site access road was assumed for the four Action alternatives. Because this improvement was assumed as part of the alternatives, if the City chooses to adopt changes in land use designations and zoning to support one of the Action alternatives, it will be necessary to also add the 24<sup>th</sup> Street Extension project to the City's long-range Transportation Improvement Plan. If the proposed change in land use designation is approved and phased development of the alternative site desired, for any development proposed prior to completion of the 24<sup>th</sup> Street E extension, the City would need to require supplemental transportation analysis from the applicant showing that the traffic generated by that phase can be accommodated by the existing roadway network.

For this SEIS analysis, the City's existing model was updated to provide forecasts at the study area intersections located along the Stewart Road SE and 24<sup>th</sup> Street E corridors, which had not been included in previous Comprehensive Plan analyses.

As described previously in Chapter 2, the City's current travel demand forecasting model includes two land use assumptions that are no longer included in the City's future land use plan: inclusion of the Orton Junction UGA and development of the Fleishmann property as mixed use. However, transportation analysis previously completed for the EIS for the City of Sumner Comprehensive Plan Update and Amendments (City of Sumner, 2010) shows very little change in volumes in the Sumner Meadows Docket study area vicinity, given the distance between the two subareas and also the respective land uses and travel characteristics within the areas. Further, the Fleishmann's Industrial Park, LLC MIC Overlay Expansion Final EIS (City of Sumner, 2011) addresses mixed use and industrial alternatives and show no difference in levels of service based on the alternatives. Therefore, it was determined that the model forecasts still reasonably reflect conditions in the transportation analysis area.

### LAND USE ASSUMPTIONS

For the transportation impact analysis presented in this SEIS, the travel demand forecasting model was used to project future traffic conditions, based upon the household and employment totals summarized for each alternative, as summarized in Chapter 2. The following land use assumptions are reflected in the model for each SEIS alternative.

- **Alternative 1: Sumner Meadows Docket Application** – Within the TAZs that include the Golf Course, the existing Golf Course was assumed to be redeveloped as industrial.
- **Alternative 2: Areawide Industrial** – Within the TAZs that include the Golf Course, the existing Golf Course was assumed to be redeveloped as industrial. Within the TAZs located directly the west and northwest of the Golf Course site, the planned future land use for the affected parcels was assumed to be industrial instead of General Commercial.
- **Alternative 3: Areawide Industrial and Residential** – Within the TAZs that include the existing Golf Course, as well as the TAZ located directly northwest of the Golf Course site, the planned future land use for the affected parcel was assumed to be Light Industrial. Within the TAZ located directly west of the Golf Course site, the future land use for the affected parcel was assumed to be Urban Village with High Density Residential.
- **Alternative 4: Off-Site** – Within the TAZs that include the zoned Agriculture area (located directly to the south of the Golf Course site) the planned future land use was assumed to be Light Industrial instead of Agriculture.
- **Alternative 5: No Action** – Within all TAZs potentially affected by Alternatives 1 through 4, the future land use reflected in the City's current GMA Comprehensive Plan was assumed.

### TRIP GENERATION ESTIMATES

Exhibit 3-28 summarizes the net new PM peak hour trips projected to be generated by build-out of the SEIS alternatives, as compared to Alternative 5 (No Action). As shown, the net new trips generated by Alternatives 1 through 3 are expected to be similar in magnitude, with Alternative 3 the highest of the three. Alternative 4 is expected to generate the lowest number of net new trips compared to No Action.

**Exhibit 3-28. Net New PM Peak Hour Trip Estimates for the SEIS Action Alternatives**

Alternative	PM Peak Hour Vehicle Trips		
	Inbound	Outbound	Total
Alternative 1: Sumner Meadows Docket Application	528	877	1,405
Alternative 2: Areawide Industrial	506	849	1,355
Alternative 3: Areawide Industrial and Residential	636	906	1,542
Alternative 4: Off-Site	37	56	93

Source: Transpo, 2014.

**2030 ROADWAY OPERATIONS WITH SEIS ALTERNATIVES**

Forecast traffic volumes were projected for each of the SEIS alternatives using the methods described above. Intersection levels of service were evaluated for 2030 PM peak hour conditions, using the Highway Capacity Manual methods described previously.

Traffic counts conducted at the analysis intersections located along Stewart Road SE and 24<sup>th</sup> Street indicated very high existing truck percentages, as high as 30% trucks, with many traffic movements having between 10% and 20% trucks. Because the SEIS alternatives would consist primarily of industrial development that is consistent with the industrial uses that currently predominate the area, future operational analysis assumed that the existing high proportions of truck traffic would continue.

Exhibit 3-29 summarizes the forecast 2030 PM peak hour levels of service for citywide intersections with each of the SEIS alternatives.

**Exhibit 3-29. 2030 Level of Service for the DSEIS Alternatives – PM Peak Hour**

Intersections	Jurisdiction	Alternative 1 Sumner Meadows		Alternative 2 Areawide Industrial		Alternative 3 Areawide Ind/Res		Alternative 4 Offsite		Alternative 5 No Action		
		LOS <sup>1</sup>	Delay <sup>2</sup>	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	
<b>Signalized<sup>3</sup></b>												
1	Valley Avenue/ Meade-McCumber Road	Sumner	B	19.3	B	19.3	B	19.3	B	18.6	B	18.5
2	Valley Avenue/Main Street	Sumner	B	17.6	B	17.6	B	17.5	B	17.7	B	17.7
3	Valley Avenue/Elm Street	Sumner	A	9.9	A	9.9	A	9.9	A	9.5	A	9.5
8	East Valley Highway/ Forest Canyon Road	Sumner	A	6.5	A	6.6	A	6.6	A	6.7	A	6.7
9	West Valley Highway/ Sumner-Heights Road	Sumner	C	25.3	C	25.4	C	25.1	C	23.5	C	22.8
10	West Valley Highway/ Pacific Avenue	Sumner	D	53.1	D	53.0	D	51.9	D	45.3	D	43.3
11	Fryar Avenue/Zehnder Avenue	Sumner	B	18.2	B	18.2	B	18.1	B	16.3	B	15.8
12	Traffic Avenue/Main Street <sup>5</sup>	Sumner	<b>F</b>	<b>97.9</b>	<b>F</b>	<b>98.3</b>	<b>F</b>	<b>97.3</b>	<b>F</b>	<b>88.2</b>	<b>F</b>	<b>85.6</b>
14	Traffic Avenue/SR 410 WB ramps <sup>5</sup>	Sumner/ WSDOT	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>
15	Traffic Avenue/SR 410 EB ramps <sup>5</sup>	Sumner/ WSDOT	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>
17	Wood Avenue/Main Street	Sumner	C	31.6	C	31.4	C	31.1	C	31.4	C	31.2
18	West Valley Highway/24th Street E	Sumner	B	18.5	B	18.4	B	18.4	B	16.2	B	15.8
19	West Valley Highway/ SR 167 SB ramps	Sumner/ WSDOT	<b>E</b>	<b>76.0</b>	<b>E</b>	<b>75.5</b>	<b>E</b>	<b>74.8</b>	D	41.8	D	39.4

**Exhibit 3-29. 2030 Level of Service for the DSEIS Alternatives – PM Peak Hour**

Intersections	Jurisdiction	Alternative 1 Sumner Meadows		Alternative 2 Areawide Industrial		Alternative 3 Areawide Ind/Res		Alternative 4 Offsite		Alternative 5 No Action	
		LOS <sup>1</sup>	Delay <sup>2</sup>	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
20 SR 167 NB ramps/24 <sup>th</sup> Street E	Sumner/ WSDOT	D	36.8	D	36.7	D	36.7	C	20.2	B	18.5
24 West Valley Highway/ Jovita Boulevard E	Pierce County	C	32.1	C	32.8	C	34.4	C	30.1	C	27.7
26 SR 167 NB ramps/Stewart Road SE	Pacific/ WSDOT	D	47.8	D	47.1	D	48.7	D	47.4	D	46.0
28 Valentine Avenue SE/ Stewart Road SE	Pacific	C	26.1	C	26.4	C	27.7	C	26.7	C	26.3
30 East Valley Highway/ Terrace View Drive SE	Auburn	B	14.4	B	14.3	B	14.8	B	13.3	B	13.2
31 East Valley Highway/ East Valley Access Road	Auburn	B	12.2	B	12.2	B	12.1	B	10.6	B	10.6
<b>All-Way Stop Controlled<sup>3</sup></b>											
6 160th Avenue E/Main Street	Sumner	<b>F</b>	<b>101.0</b>	<b>F</b>	<b>100.1</b>	<b>F</b>	<b>99.5</b>	<b>F</b>	<b>90.9</b>	<b>F</b>	<b>90.5</b>
16 Alder Avenue/Main Street <sup>5</sup>	Sumner	<b>F</b>	<b>98.2</b>	<b>F</b>	<b>97.6</b>	<b>F</b>	<b>96.5</b>	<b>F</b>	<b>94.9</b>	<b>F</b>	<b>94.3</b>
<b>One- or Two-Way Stop Controlled<sup>4</sup></b>											
4 E Valley Highway/Elm Street	Sumner	<b>E</b>	<b>38.2</b>	<b>E</b>	<b>37.7</b>	<b>E</b>	<b>38.1</b>	<b>E</b>	<b>36.0</b>	<b>E</b>	<b>35.2</b>
5 Valley Avenue/Gary Street	Sumner	D	34.8	D	35.0	<b>E<sup>6</sup></b>	<b>35.2<sup>6</sup></b>	D	33.7	D	34.2
13 Traffic Avenue/Maple Street	Sumner	B	11.2	B	11.2	B	11.2	B	11.3	B	11.3
21 136 <sup>th</sup> Avenue E/24 <sup>th</sup> Street E	Sumner	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>
23 142 <sup>nd</sup> Avenue E/24 <sup>th</sup> Street E	Sumner	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>C</b>	<b>17.8</b>	<b>B</b>	<b>14.0</b>
25 SR 167 SB ramps/Stewart Road SE	Pacific/ WSDOT	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>	<b>F</b>	<b>&gt;200</b>
34 Site Access Road/Stewart Road E	Sumner	B	14.5	B	13.7	B	13.8	B	13.6	B	13.6

**Exhibit 3-29. 2030 Level of Service for the DSEIS Alternatives – PM Peak Hour**

Intersections	Jurisdiction	Alternative 1 Sumner Meadows		Alternative 2 Areawide Industrial		Alternative 3 Areawide Ind/Res		Alternative 4 Offsite		Alternative 5 No Action	
		LOS <sup>1</sup>	Delay <sup>2</sup>	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
35 Site Access Road/24 <sup>th</sup> Street E	Sumner	B	13.1	B	13.1	B	13.1	--	--	--	--

Source: Transpo 2014, Heffron Transportation, Inc. 2014.

1. LOS = Level of Service
2. Delay = Average Delay in Seconds per Vehicle
3. Level of service for signalized and all-way stop-controlled intersections is based upon the average delay of all movements through the intersection.
4. Level of service for one- or two-way stop-controlled intersections is based upon the average delay of the most congested movement through the intersection.
5. This intersection is exempt from the City of Sumner’s level of service standard of LOS D.
6. Alternative 3 is also projected to add a very small amount of delay to intersection (5) Valley Avenue/Gary Street (1.0 additional second per vehicle compared to Alternative 5, No Action), which would increase its delay to 0.2 seconds over the LOS D threshold. However, since this margin is so small, the intersection is considered to effectively operate at LOS D.

**Impacts Common to All Alternatives**

## ROADWAY OPERATIONS

As shown in Exhibit 3-29 the following eight intersections are projected to operate at LOS E or LOS F in 2030 with all alternatives:

- **(4) East Valley Highway/Elm Street** – LOS E with all alternatives – located in Sumner
- **(6) 160<sup>th</sup> Avenue E/Main Street** – LOS F with all alternatives – located in Sumner
- **(12) Traffic Avenue/Main Street** – LOS F with all alternatives – located in Sumner – *Transportation Element Policy 3.1 establishes LOS F standard for this intersection*
- **(14) Traffic Avenue/SR 410 westbound ramps** – LOS F with all alternatives – located in Sumner – *Transportation Element Policy 3.3 exempts this intersection from concurrency*
- **(15) Traffic Avenue/SR 410 eastbound ramps** – LOS F with all alternatives – located in Sumner – *Transportation Element Policy 3.3 exempts this intersection from concurrency*
- **(16) Alder Avenue/Main Street** – LOS F with all alternatives – located in Sumner – *Transportation Element Policy 3.1 establishes LOS F standard for this intersection*
- **(21) 136<sup>th</sup> Avenue E/24<sup>th</sup> Street E** – LOS F with all alternatives – located in Sumner
- **(25) SR 167 southbound ramps/Stewart Road SE** – LOS F with all alternatives – located in the City of Pacific but under WSDOT jurisdiction and not subject to concurrency

Of these, four intersections located in Sumner are not subject to the LOS D concurrency standard, as per existing adopted City policy noted above (City of Sumner 2012).

The remaining four intersections are stop-sign controlled. (4) East Valley Highway/Elm Street is projected to operate at LOS E and (6) 160<sup>th</sup> Avenue E/Main Street is projected to operate at LOS F with Alternative 5 (No Action). These two intersections are located more than two miles south of the alternative sites, and the SEIS Action alternatives are expected to add very little additional delay (less than 4 seconds per vehicle) at these locations. It is noted that 106<sup>th</sup> Avenue E/Main Street is projected to have average delay of 35.2 seconds per vehicle with Alternative 5 (No Action), which is 0.2 seconds over the LOS D threshold. Since this margin is so small, the intersection could be considered to still effectively operate at LOS D with No Action. However, while the Action Alternatives are expected to add only 1 to 3 seconds of average delay to this intersection, the added delay would put the operation more solidly into the LOS E range.

(21) 136<sup>th</sup> Avenue E/24<sup>th</sup> Street E and (25) SR 167 southbound ramps/Stewart Road SE are both projected to operate at LOS F with Alternative 5 (No Action). Since these intersections are located near the alternative sites the SEIS alternatives are expected to add a greater amount of delay at these locations. As shown previously in Exhibit 3-25, the SR 167 southbound ramps/Stewart Road SE intersection is operating at LOS F under existing conditions. Additional traffic generated by regional growth, as well as by the SEIS alternatives, is expected to worsen conditions at this intersection. However, this intersection, located in the City of Pacific, is a designated HSS facility and would not be subject to local city standards; it is under WSDOT jurisdiction.

## FREIGHT MOVEMENT

The model analysis showed that the majority of trips generated by the SEIS alternatives would travel between the alternative sites and SR 167, via Stewart Road SE and 24<sup>th</sup> Street E. Because all alternatives would include industrial development similar in character to the existing industrial uses in the area, it is expected that they would generate truck traffic similar in proportion to that currently generated along Stewart Road SE and 24<sup>th</sup> Street E —as high as 30% for some traffic movements, and between 10% and 20% for many traffic movements through intersections

along these roads. The operational analysis presented above reflects these truck percentages. However, both corridors are have WSDOT FGTS designations, and are identified by the City as truck routes. Additional truck traffic generated by the SEIS alternatives would be similar to what is already occurring on Stewart Road SE and 24<sup>th</sup> Street E, and is consistent with local and statewide policies. Therefore, no adverse impact related to freight truck traffic is identified.

### SITE ACCESS, CIRCULATION AND PARKING

With all alternatives, the facilities and site design needed to support internal vehicle access, circulation, parking, pedestrian movement, and bicycle movement would be determined at the project level when specific development proposals are submitted. Vehicular and non-motorized access and circulation, as well as parking requirements, would be subject to City development code. The requirement would be documented in the traffic impact analysis completed as part of project-level SEPA review. With City development code requirements incorporated at the project level, no adverse impacts to access, circulation or parking are expected to result from any of the alternatives

### TRANSIT

With no fixed-route transit service provided in the vicinity of the proposal study area, it is expected that none of the alternatives would generate transit demand. Therefore, no transit impacts are identified.

### ***Alternative 1 Sumner Meadows Docket Application***

As shown in Exhibit 3-29, the following two additional intersections are projected to have operational deficiencies in 2030 with Alternative 1:

- (19) West Valley Highway/SR 167 southbound ramps – projected to degrade from LOS D (with No Action) to LOS E – located in Sumner but under WSDOT jurisdiction.
- (23) 142<sup>nd</sup> Avenue E/24<sup>th</sup> Street E – projected to degrade from LOS B (with No Action) to LOS F – located in Sumner.

The West Valley Highway/SR 167 southbound ramps intersection is signalized and is currently operating at LOS B. Additional traffic resulting from local and regional growth (as reflected in Alternative 5, No Action) is projected to degrade operations to LOS D by 2030. The additional trips generated by Alternative 1 through this intersection are expected to further degrade operations to LOS E. However, since SR 167 is an HSS facility, this intersection is exempt from the City's level of service standards.

The 142<sup>nd</sup> Avenue E/24<sup>th</sup> Street E intersection is currently stop-controlled and was assumed to remain stop-controlled for the 2030 analysis. However, completion of the 24<sup>th</sup> Street Extension and use of 24<sup>th</sup> Street E as a major access road into and out of the proposal study area would substantially increase vehicle volumes through this intersection. Without mitigation, additional traffic generated by Alternative 1 is expected to degrade operation at this intersection from LOS B to LOS F.

### ***Alternative 2 Areawide Industrial Alternative***

Alternative 2 is expected to result in impacts to intersections (19) West Valley Highway/SR 167 southbound ramps and (23) 142<sup>nd</sup> Avenue/24<sup>th</sup> Street E that are similar to the impacts identified with Alternative 1. Since SR 167 is an HSS facility, this intersection is exempt from the City's level of service standards.

### ***Alternative 3 Areawide Industrial and Residential Alternative***

Alternative 3 is expected to result in impacts to intersections (19) West Valley Highway/SR 167 southbound ramps and (23) 142<sup>nd</sup> Avenue/24<sup>th</sup> Street E that are similar to the impacts identified with Alternative 1. Since SR 167 is an HSS facility, this intersection is exempt from the City's level of service standards.

Alternative 3 is also projected to add a very small amount of delay to intersection (5) Valley Avenue/Gary Street (1.0 additional second per vehicle compared to Alternative 5, No Action), which would increase its delay to 0.2 seconds over the LOS D threshold. However, since this margin is so small, the intersection is considered to effectively operate at LOS D.

#### ***Alternative 4 Offsite Alternative***

No additional transportation impacts are identified for this alternative.

#### ***Alternative 5 No Action Alternative***

No additional transportation impacts are identified for this alternative.

### **3.7.3 Mitigation Measures**

#### ***Incorporated Plan Features***

Build-out of Alternatives 1 through 4 would require that the City add the 24<sup>th</sup> Street Extension project to its long-range Transportation Improvement Plan. The City's current TIP includes a corridor study for this connection as Project A9 (City of Sumner, 2013b).

#### ***Applicable Regulations and Commitments***

The analysis presented in this Draft SEIS assumes implementation of the City's adopted long-range transportation improvement program, with the exception of identified improvements to state routes as described previously.

With the No Action and all Action alternatives, any new development projects proposed within the alternative sites would be subject to the following regulations as part of project-level SEPA review.

- Project-level traffic impact analyses are required, which typically include a development-level analysis of roadway operations, safety, parking, access, and non-motorized impacts. For Alternatives 1 through 4, if phased development were desired, for any development proposed prior to completion of the 24th Street E extension, the City would need to require transportation analysis from the applicant showing that the traffic generated by that phase can be accommodated by the existing roadway network.
- Proposed projects must also pay road impact fees established under the Concurrency Management System (SMC Chapter 12.36) to contribute their share toward citywide transportation improvement projects identified to support growth in development.
- The development must adhere to the City's development code, including parking requirements and guidelines for frontage and non-motorized improvements.

#### ***Other Potential Mitigation Measures***

The following mitigation measures have been identified to address roadway operational impacts for the SEIS alternatives. Exhibit 3-30 summarizes the levels of service for impacted intersections with mitigation in place. At all existing stop-controlled intersections currently projected to operate at LOS E or LOS F by 2030, traffic signal warrants established in the *Manual for Uniform Traffic Control Devices* (FHWA 2012) would typically need to be met before a traffic signal is installed. It is possible for a stop-controlled intersection to operate at LOS E or LOS F during the PM peak hour without having high enough overall traffic volumes to meet signal warrant criteria. In this case, the agency with jurisdiction (City or WSDOT) may need to adopt policy that allows a higher level of service until such time that traffic volumes are high enough to warrant installation of a traffic signal.

Mitigation has not been identified for intersections that are not subject to the City standard of LOS D, which have been previously analyzed for the City Comprehensive Plan (City of Sumner 2011, 2012). For the two SR 167 ramp intersections that have not been included in previous Sumner Comprehensive Plan analyses, potential improvement projects have been identified. However, the SR 167 ramp intersections are under state jurisdiction,

and it would be WSDOT's decision whether potential improvements would be high enough in priority to be programmed as part of the statewide transportation improvement program, or whether a policy decision to accept higher levels of service would be warranted until such time that future improvements could be funded (similar to the direction previously provided by WSDOT for Comprehensive Plan analysis conducted in 2011, and reflected in Transportation Element Policy 3.3).

### ROADWAY CAPACITY IMPROVEMENTS COMMON TO ALL ALTERNATIVES

- (4) East Valley Highway/Elm Street – Install a traffic signal. Analysis indicated that a two-phase signal with permitted southbound left turns would improve operation to LOS A for all alternatives. (Jurisdiction: City of Sumner)
- (6) 160<sup>th</sup> Avenue E/Main Street – Install a traffic signal. Analysis indicated that a two-phase signal with permitted left turns would improve operation to LOS A for all alternatives. (Jurisdiction: City of Sumner)
- (21) 136<sup>th</sup> Avenue E/24<sup>th</sup> Street E – Install a traffic signal. Analysis indicates that a two-phase signal with permitted left turns would improve operation to LOS A for all alternatives. (Jurisdiction: City of Sumner).
- (25) SR 167 southbound ramps/Stewart Road SE – Install a traffic signal. Analysis indicates that phasing to include protected left turns in the southbound and westbound directions as well as coordination with the signal at East Valley Highway/Jovita Boulevard E (24) would improve operation to LOS D. Operation at East Valley Highway/Jovita Boulevard E would continue to operate at LOS C with the signals coordinated. (Jurisdiction: WSDOT/City of Pacific for SR 167 southbound ramps/Stewart Road SE, Pierce County for East Valley Highway/Jovita Boulevard E).

### ADDITIONAL ROADWAY CAPACITY IMPROVEMENTS FOR ALTERNATIVES 1 THROUGH 3

- (19) West Valley Highway/SR 167 southbound ramps – Based on PM peak hour volumes, analysis indicates that operation would be improved to LOS D if the current westbound configuration were changed from double right-turn lanes and a single left-turn lane, to double left-turn lanes and a single right-turn lane. Phasing would need to be modified to provide for protected westbound left turns and to stop southbound-through traffic to allow two receiving lanes on southbound West Valley Highway. However, review of AM peak hour volumes would need to be conducted to determine if this reconfiguration can be accommodated in the morning. If not, the westbound leg could be widened to provide double left-turn and double right-turn lanes. As this is a WSDOT facility, it is also possible that WSDOT could choose to allow this intersection to operate at LOS E if future traffic growth occurs at the rate projected. As shown in Exhibit 3.8-4, this intersection is currently operating at LOS B. (Jurisdiction: WSDOT/City of Sumner)
- (23) 142<sup>nd</sup> Avenue E/24<sup>th</sup> Street E – Install a traffic signal. Provide a left-turn lane and right-turn lane in the southwest direction. Analysis indicates that a two-phase signal with permitted eastbound left turns would improve operation to LOS B. It is noted that operations at this intersection would be studied in detail as part of the 24<sup>th</sup> Street Corridor Study (Project A9 in the City's 2014-2019 TIP), which could result in different improvements at this intersection based on a comprehensive corridor-wide strategy. (Jurisdiction: City of Sumner)

### 3.7.4 Significant Unavoidable Adverse Impacts

With identified mitigation measures in place, no significant unavoidable adverse impacts are identified.

**Exhibit 3-30. 2030 Level of Service for the DSEIS Alternatives – PM Peak Hour – With Mitigation**

Intersection	Jurisdiction	Alternative											
		1 Sumner Meadows		2 Areawide Industrial		3 Areawide Ind/Res		4 Offsite		5 No Action			
		LOS <sup>1</sup>	Delay <sup>2</sup>	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay		
<b>Signalized<sup>3</sup></b>													
4	E Valley Highway/Elm Street	Sumner	A	3.5	A	3.5	A	3.5	A	3.6	A	3.6	
6	160 <sup>th</sup> Avenue E/Main Street	Sumner	A	6.9	A	6.9	A	6.8	A	6.7	A	6.7	
19	West Valley Highway/SR 167 SB ramps	Sumner/ WSDOT	D	39.4	D	39.4	D	39.8	(4)	(4)	(4)	(4)	
21	136 <sup>th</sup> Avenue E/24 <sup>th</sup> Street E	Sumner	B	13.6	B	13.5	B	14.1	B	15.0	A	9.8	
23	142 <sup>nd</sup> Avenue E/24 <sup>th</sup> Street E	Sumner	B	13.5	B	13.5	B	13.7	(4)	(4)	(4)	(4)	
24	West Valley Highway/Jovita Blvd E <sup>5</sup>	Pierce County	C	31.2	C	31.6	C	32.9	C	30.0	C	28.5	
25	SR 167 SB ramps/Stewart Road SE	Pacific/ WSDOT	D	36.3	D	38.2	D	41.2	D	36.4	D	35.8	

Source: Transpo 2014, Heffron Transportation, Inc. 2014.

1. LOS = Level of Service
2. Delay = Average Delay in Seconds per Vehicle
3. Level of service for signalized intersections is based upon the average delay of all movements through the intersection.
4. No mitigation required at this location with Alternatives 4 or 5.
5. No adverse impacts were identified at this intersection. However, since the recommended signalization of SR 167 southbound ramps/Stewart Road SE includes coordination with this signal, its operation with the mitigation is included.

## 3.8 Noise

This section evaluates the study area for potential community noise impacts. The study area is defined as the region within roughly 1,000 feet of the study area parcels, and the area within 500 feet of public roads that serve the study area parcels. This study area was derived as the region that could conceivably be affected by noise from stationary equipment and increased traffic.

### 3.8.1 Affected Environment

#### *Definition of Terms*

For the purposes of this analysis, noise can be described as sound that is undesired, in terms of its loudness (amplitude) and frequency (pitch). Since the human ear is not equally sensitive to sound at all frequencies, a frequency-dependent rating relates noise to human hearing sensitivity. This is called the A-weighted decibel (dBA) scale. This scale accounts for the human perception of a doubling of loudness as an increase of 10 dBA. Therefore, a 70-dBA sound level will sound twice as loud as a 60-dBA sound level. People generally cannot detect differences of 1 to 2 dBA between noise sources of a similar nature (e.g., an increase in traffic noise compared to existing traffic noise); however, under ideal listening conditions, differences of 2 or 3 dBA can be detected by some people. Most people under normal listening conditions would probably perceive a 5-dBA change in noise of a similar nature. However, if an intruding noise is of a different nature than background noise (e.g., backup alarms in a quiet neighborhood), many people can perceive the intruding noise even if it increases the overall dBA noise level by less than 1 dBA.

When distance is the only factor considered, sound levels from isolated point sources of noise typically decrease by about 6 dBA for every doubling of distance from the noise source. When the noise source is a continuous line (e.g., vehicle traffic on a highway), sound levels decrease by about 3 dBA for every doubling of distance. In traffic studies, an attenuation rate of 4.5 dBA per doubling of distance is often used when the roadway is at ground level and the intervening ground is effective in absorbing sound (e.g., ground vegetation, scattered trees, and clumps of bushes).

Noise levels at different distances can also be affected by several factors other than the distance from the noise source. Topographic features and structural barriers that absorb, reflect, or scatter sound waves can affect the decreasing noise levels. Atmospheric conditions (wind speed and direction, humidity levels, and temperatures) can also affect the degree to which sound is attenuated over distance.

Echoes off topographical features or buildings can sometimes result in higher sound levels (lower sound attenuation rates) than normally expected. Temperature inversions and altitudinal changes in wind conditions can also refract and focus sound waves toward a location at considerable distance from the noise source. As a result, the existing noise environment can be highly variable depending on local conditions.

#### *Noise-Sensitive Receiver Locations*

Noise-sensitive “uses” include residences, schools, parks, and churches located throughout the study area, but primarily in the subdivisions north of Lake Tapps Parkway East and across the White (Stuck) River on 146<sup>th</sup> Avenue East and 29<sup>th</sup> Street East. In general, the subdivisions north of Lake Tapps Parkway East consist of densely concentrated multi-family townhomes. The neighborhood across the White River on 146<sup>th</sup> Avenue East and 29<sup>th</sup> Street East consists of low density single-family residential houses. Generally, residences are shielded from stationary industrial operations by terrain, existing roadways, and forested areas.

Although no sound level measurements were taken as part of this evaluation, noise levels are expected to generally comply with noise criteria except near busy roads and freeways. A railroad runs north to south through the study area, west of East Valley Highway East. Periodic noise from the railroad or overhead airplanes would also affect some residential areas.

**City of Sumner Noise Ordinance**

The Sumner Municipal Code (SMC) provides regulations that limit noise from construction and from commercial and industrial facilities within the City. SMC chapters that regulate noise in the City are summarized below.

Chapter 15.34, Construction Hours, limits construction hours to 7:00 a.m. to 6:00 p.m. on weekdays, and to 10:00 a.m. to 6:00 p.m. on Saturdays, Sundays, and legal holidays.

Chapter 8.14, Noise Control, sets allowable outdoor noise levels in residential areas near proposed future commercial and industrial facilities. The allowable noise limits apply to all hours, with lower allowable limits at night. Temporary construction activity that complies with the allowable hour limitations set by Chapter 15.34 is exempt from the numerical noise limits. Vehicles traveling on public roads are also exempt from the numerical limits, as long as the vehicles are equipped with legally approved mufflers.

Ecology (WAC 173-60) has classified three areas or zones based on land use and established maximum permissible noise levels, titled Environmental Designation for Noise Abatement (EDNA), and are as follows:

- Residential areas: Class A EDNA
- Commercial areas: Class B EDNA
- Industrial areas: Class C EDNA.

Jurisdictions may designate EDNAs or their own classifications. The City has adopted a Noise Control ordinance with EDNAs, which also includes nuisance noise, which broadly covers certain noise sources such as amplified sounds (e.g., radios, speakers). SMC Chapter 8.14 sets forth EDNAs, maximum noise levels between EDNAs, exceptions, deviations, variances and provisions for enforcement (Exhibit 3-31).

**Exhibit 3-31. Sumner Maximum Permissible Noise Levels**

EDNA of Noise Source	EDNA of Receiving Property (dBA)		
	Class A	Class B	Class C
Class A	55	57	60
Class B	57	60	65
Class C	60	65	70

Source: Sumner Municipal Code Chapter 8.14.

Notes:

Class A Zones: LDR-4; LDR-6; LDR-7.2; LDR 8.5; LDR-12; MDR; HDR; RP; MUD

Class B Zones: NC; CBD; GC; IC

Class C Zones: M-1; M-2; AG

**Washington State Department of Transportation (WSDOT) Traffic Noise Abatement Protocol**

Freeways and other state routes can be sources of noise. For traffic noise, WSDOT considers a 10-dBA or greater increase to be a significant impact; WSDOT standards apply only if the City uses state or federal funds for roadway improvement projects.

According to WSDOT, noise abatement must be considered if either of two types of impact is determined:

- Substantial increase exceeding 10 dBA compared to existing conditions.
- Peak-hour traffic noise levels at sensitive receiver locations exceed Noise Abatement Criteria.

### 3.8.2 Impacts

Noise impacts on the community are considered for the following elements: temporary construction noise, long-term operational noise from stationary industrial operations, and long-term noise increases along existing public roads caused by increased traffic.

#### ***Impacts Common to All Alternatives***

##### TEMPORARY CONSTRUCTION NOISE

Construction of infrastructure, housing, and business facilities is usually accompanied by temporary increases in noise due to the use of heavy equipment and hauling of construction materials. Noise impacts depend on the background sound levels, the type of construction equipment being used, and the amount of time it is in use.

SMC 15.34 limits construction activity for commercial and industrial facilities to daytime hours. This would prevent construction noise impacts during periods when most people are at home sleeping. Construction noise may still have a temporary, localized impact on nearby residences and businesses, although construction noise produced during the day is exempt from environmental noise regulations.

##### NOISE FROM STATIONARY INDUSTRIAL AND COMMERCIAL OPERATIONS

Future industrial and commercial facilities could use stationary mechanical equipment that, unless properly designed or controlled, could cause community noise levels to exceed the allowable City noise ordinance limits. In addition, future facilities could use outdoor loading docks and outdoor material storage areas that, unless properly designed and controlled, could generate substantial amounts of noise in the surrounding community. Permitted uses in commercial and manufacturing districts are presented in Chapters 18.16 and 18.18 of the SMC, respectively.

Mitigation measures to reduce these noise impacts to less than significant levels are described in Section 3.8.3, Mitigation Measures.

##### INCREASED TRAFFIC NOISE

Future commercial and industrial facilities would likely increase traffic volumes on existing public roads. However, due to the relatively small size of the study area and the associated square footage of allowable development in that area, it is unlikely that the cumulative traffic volumes generated by new commercial and industrial facilities would be high enough to cause a significant increase in traffic noise (defined as a 10-dBA increase compared to existing conditions) at sensitive receiver locations along the roads.

However, if the City added new lanes or widened the roadway at intersections to accommodate additional truck traffic associated with the proposed actions, then the traffic noise level at sensitive receiver locations could exceed WSDOT's Noise Abatement Criteria. If the City used state or federal funds to widen the roadway, this would trigger the WSDOT requirement to rigorously model future traffic noise impacts and evaluate traffic noise abatement, and to present the results of the noise abatement analysis in the project-level federal or state environmental documentation (NEPA or SEPA) for the roadway widening project.

#### ***Alternative 1: Sumner Meadows Docket Application***

##### TEMPORARY CONSTRUCTION NOISE

Temporary construction noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section and would result from construction of commercial and industrial buildings on 154 acres of developable land.

NOISE FROM STATIONARY INDUSTRIAL AND COMMERCIAL OPERATIONS

Noise impacts from stationary industrial and commercial operations under this alternative would be as described in the Impacts Common to All Alternatives section. This alternative is expected to generate about 3,523 jobs, which is slightly less than under Alternatives 2 and 3, but significantly more than under Alternatives 4 and 5. This alternative would result in industrial operations within 800 feet of existing multi-family townhomes north of Lake Tapps Parkway East; however, steep terrain between the residences and the subject Golf Course site is anticipated to serve as a noise barrier. Additionally, this alternative would result in industrial operations that are adjacent to the east of land that is zoned for High Density Residential (HDR) development.

INCREASED TRAFFIC NOISE

Traffic noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section. The major roadways most likely to experience higher traffic volumes under this alternative are State Route (SR) 167, Stewart Road, East Valley Highway East, Lake Tapps Parkway East and 24<sup>th</sup> Street. Traffic noise impacts from these roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed.

***Alternative 2: Areawide Industrial Alternative***

TEMPORARY CONSTRUCTION NOISE

Temporary construction noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section and would result from construction of commercial and industrial buildings on 198 acres of developable land.

NOISE FROM STATIONARY INDUSTRIAL AND COMMERCIAL OPERATIONS

Noise impacts from stationary industrial and commercial operations under this alternative would be as described in the Impacts Common to All Alternatives section. This alternative is expected to generate 3,752 jobs, which is greater than under any other alternative. This alternative would result in new industrial operations within 800 feet of existing multi-family townhomes north of Lake Tapps Parkway East; however, steep terrain between the existing Golf Course and these homes is anticipated to serve as a noise barrier.

INCREASED TRAFFIC NOISE

Traffic noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section. The major roadways most likely to experience higher traffic volumes under this alternative are SR 167, Stewart Road, East Valley Highway East, Lake Tapps Parkway East and 24<sup>th</sup> Street. Traffic noise impacts from these roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed.

***Alternative 3: Areawide Industrial and Residential Alternative***

TEMPORARY CONSTRUCTION NOISE

Temporary construction noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section and would result from construction of commercial, industrial, and residential buildings on 198 acres of developable land.

NOISE FROM STATIONARY INDUSTRIAL AND COMMERCIAL OPERATIONS

Noise impacts from stationary industrial and commercial operations under this alternative would be as described in the Impacts Common to All Alternatives section. This alternative is expected to generate 3,651 jobs, which is greater than under Alternatives 1, 4, and 5, but less than under Alternative 2. Additionally, this alternative would add 450 housing units to the study area, increasing the population by approximately 990

people. This alternative would result in industrial operations that are adjacent to the east of land that is zoned for HDR development. Additionally, this alternative would result in an expansion of the HDR-zoned land adjacent to the west and create additional noise-sensitive receptors that could be impacted by noise from surrounding industrial and commercial facilities. However, the City would be retain ownership of land within 200 feet of the White (Stuck) River which would limit proximity of future development. As with Alternatives 1 and 2, this alternative would result in industrial operations within 800 feet of existing multi-family townhomes north of Lake Tapps Parkway East; however, steep terrain between the residences and the existing Golf Course is anticipated to serve as a noise barrier. The 8<sup>th</sup> Street canal and required 75-foot buffer would also serve as a noise barrier between potential residential uses and industrial uses to the east.

#### INCREASED TRAFFIC NOISE

Traffic noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section. The major roadways most likely to experience higher traffic volumes under this alternative are SR 167, Stewart Road, East Valley Highway East, Lake Tapps Parkway East and 24<sup>th</sup> Street. Traffic noise impacts from these roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed.

#### ***Alternative 4: Offsite Alternative***

##### TEMPORARY CONSTRUCTION NOISE

Temporary construction noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section and would result from construction of commercial and industrial buildings on 108 acres of developable land.

##### NOISE FROM STATIONARY INDUSTRIAL AND COMMERCIAL OPERATIONS

Noise impacts from stationary industrial and commercial operations under this alternative would be as described in the Impacts Common to All Alternatives section. This alternative is expected to generate 302 jobs, which is significantly less than all other action alternatives, and this alternative would likely produce less noise from stationary industrial or commercial operations. However, this alternative would create industrial and commercial operations in close proximity to existing noise-sensitive receivers (low density single-family residences across the White River on 146<sup>th</sup> Avenue East and 29<sup>th</sup> Street Court East). The closest of these homes is within 500 feet of the proposed industrial land and the only existing barriers are trees along the White River shoreline.

#### INCREASED TRAFFIC NOISE

Traffic noise impacts under this alternative would be as described in the Impacts Common to All Alternatives section. The major roadways most likely to experience higher traffic volumes under this alternative are East Valley Highway East and 24<sup>th</sup> Street East. Traffic noise impacts from these roadways are anticipated to be insignificant unless roadway widening or new roadway construction is proposed. The shoreline riparian area the City plans to retain would also serve as a barrier to vehicle noise.

#### ***Alternative 5: No Action Alternative***

##### TEMPORARY CONSTRUCTION NOISE

The impacts would be as described in the Impacts Common to All Alternatives section. The 154-acre Golf Course and 108-acre agricultural property to the south would not be developed. Commercial and Industrial facilities could be constructed on 34 acres along Stewart Road.

#### NOISE FROM STATIONARY INDUSTRIAL AND COMMERCIAL OPERATIONS

The impacts would be as described in the Impacts Common to All Alternatives section. The No Action Alternative would have a much smaller area devoted to employment uses than the other alternatives and would have a greater potential for producing less noise from stationary industrial or commercial operations.

The Urban Village overlay would allow a mix of commercial and residential uses. Under the No Action Alternative, 495 jobs are expected to be created, and the local population would increase by about 86 people. Commercial uses could have activities that produce noise affecting on-site and off-site residential uses.

#### INCREASED TRAFFIC NOISE

Under the No Action Alternative, the traffic noise impacts would be as described in the Impacts Common to All Alternatives section. Increased traffic under this alternative would be centered around the Urban Village on Stewart Road, which is already very busy and congested. Noise from traffic could impact new residences in the Urban Village overlay.

### 3.8.3 Mitigation Measures

All general noise mitigation measures described in the *City of Sumner Comprehensive Plan Draft Environmental Impact Statement* and the *Final Environmental Impact Statement, City of Sumner Comprehensive Plan Update Amendments* (City of Sumner 2010a,b) would apply to the study area. Measures with particular relevance to the study area are described below.

#### ***Incorporated Plan Features***

Policies encouraging alternative modes of transportation and reducing vehicular travel could reduce the potential for transportation noise sources. All alternatives also include Transportation Element policies that promote bike paths, trails (e.g. along White River), and sidewalks. The No Action Alternative would allow for mixed uses in the study area, including residential, that could allow for more non-motorized travel and access to nearby public transit facilities. Under the action alternatives, the City would retain ownership of along the White (Stuck) River and between the HDR and M-1 zone (See Exhibit 2-7 for example).

#### ***Applicable Regulations and Commitments***

The following regulations and commitments are applicable to all of the alternatives:

- SMC Chapter 8.16 includes nuisance provisions.
- SMC Chapter 8.14 provides specific noise controls and allowable community noise limits (expressed as dBA levels) for commercial and industrial sources affecting residential receivers. Additionally, this chapter provides specific noise controls and dBA levels between EDNAs.
- SMC Chapter 15.34 limits hours of construction to daytime periods.
- The SEPA review process allows the City to consider potential noise impacts.
- WSDOT Traffic Noise Abatement Protocol sets requirements to evaluate and abate traffic noise impacts, for roadway improvement projects that use state or federal funding.

#### ***Other Potential Mitigation Measures***

The City could require each industrial or commercial facility proposed for construction within 500 feet of residentially-zoned parcels to conduct a project-specific community noise impact assessment to demonstrate compliance with the community noise limits set by the City's noise ordinance (SMC Chapter 8.14). The community noise assessment would apply to any stationary equipment that produces substantial amounts of noise, and would also apply to outdoor loading dock areas and outdoor material handling areas. If a proposed facility would require a substantial number of heavy-duty truck deliveries along a corridor where residentially-

zoned parcels are within 500 feet of the roadway, then the noise study should also evaluate the potential impacts from increased traffic noise. The study would be submitted by applicants prior to the City issuing building permits for the proposed facility.

For mixed use developments, the City could require compliance with the noise ordinance for non-residential land uses within the study area parcels, as well as for uses on adjacent parcels similar to SMC Chapter 18.26 Planned Mixed-Use Development regulations that limit specific industrial uses from locating within proximity to residential uses to reduce potential noise impacts.

#### **3.8.4 Significant Unavoidable Adverse Impacts**

Noise levels would likely increase in the study area from short-term and long-term noise sources. However, implementation of appropriate mitigation measures could reduce or eliminate noise impacts on noise-sensitive receivers.

## 3.9 Public Services

### 3.9.1 Affected Environment

#### ***Law Enforcement***

Law enforcement services within city limits are provided by the Sumner Police Department. The police department is headquartered at Sumner City Hall at 1104 Maple Street, where they maintain office facilities, locker rooms and holding cells. The Police Department currently occupies approximately 9,123 square feet of City Hall. The Sumner Municipal Court is also located at City Hall, where court sessions are held every Wednesday. The City employs 19 commissioned police officers. Police officers respond to calls for emergency service, investigate crimes, and conduct patrol operations.

The City has adopted a Level of Service (LOS) standard of one police officer per 500 residents. Based on current estimated City population of 9,520 (OFM, 2013), the City would require 19 officers to meet its adopted LOS standard. As such, the City is currently meeting its adopted LOS standard for police staffing.

The Capital Facilities Element of the City's Comprehensive Plan has also adopted a LOS standard for police building space of 0.44 square feet per capita. Based on current estimated City population of 9,520 (OFM, 2013), the City would require 4,189 square feet of building space to meet its adopted standard. As such, the City is currently meeting its adopted LOS standard for police building space.

#### ***Fire and Emergency Medical Services***

East Pierce Fire and Rescue (EPF&R) provides fire and emergency medical service for all of Sumner, as well as many of the surrounding cities and unincorporated areas of Pierce County. The district serves a population of approximately 88,700 residents over a service area of approximately 152 square miles and employs 104 career officers and firefighters. The nearest station to the study area is Station 14 (Lake Tapps Station), located in unincorporated Pierce County, approximately three miles from the project area. EPF&R also maintains Station 13 (Sumner Station) in downtown Sumner, approximately five miles from the project area. Both stations are staffed by professional firefighters 24 hours per day, seven days per week.

#### LEVEL OF SERVICE STANDARD – EPF&R

EPF&R, as an independent fire service provider, maintains its own standards for coverage based on minimum response force and minimum time to arrival of first responding unit. EPF&R defines its LOS standards as follows:

- First-due response units dispatched to fire and emergency medical incidents in urban areas should arrive with five (5) minutes, 90% of the time.
- The district should maintain sufficient personnel and equipment at proper locations to provide a minimum response force at emergency incidents within 10 minutes, 90% of the time. Acceptable minimum response forces for various call types are defined as follows:
  - Structure Fire (residential and commercial hydranted areas) – 17 personnel
  - Structure Fire (residential unhydranted areas) – 19 personnel
  - Structure Fire (special risk/target hazards) – 21 personnel
  - Emergency Medical (Basic Life Support) – 4 personnel
  - Emergency Medical (Advanced Life Support) – 4-6 personnel
  - Hazardous Materials – 21 personnel
  - Technical Rescue – 24 personnel

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- Water Rescue (Lake Tapps) – 14 personnel
- Wildland Fire (low risk) – 3 personnel
- Wildland Fire (high risk) – 7 personnel
- Mass Casualty Incident – 23 personnel

As of 2009, EPF&R was meeting its 5-minute response time goal only 60% of the time for fire response, though its 90% performance was 5 minutes and 37 seconds. For EMS-only responses, the district met its goal only 59% of the time, and its 90% performance was 6 minutes and 4 seconds. (City of Sumner 2010)

In 2013, East Pierce responded to 8,519 calls, with 74% consisting of EMS incidents. Average (mean) response time (time of dispatch to on-scene) for the first unit to arrive on scene was 6 minutes, 34 seconds (EPF&R 2014).

At this time, data is not available on actual performance regarding assembly of minimum acceptable response forces by incident type, due to limitations in the structure of the data and software used for data collection and reporting by East Pierce Fire & Rescue.

### LEVEL OF SERVICE STANDARD – CITY OF SUMNER

The City has adopted the following LOS Standards for fire and emergency medical service, as stated in the 2012 Comprehensive Plan:

- Fire Suppression and Emergency Medical Response Staffing: Maintain sufficient paid firefighters, emergency medical technicians (EMTs), and paramedics to provide at least four (4) personnel per response vehicle.
- Response Time: Maintain facilities, equipment, and staffing to adequate to provide a minimum response time of 8 minutes 90% of the time.

As described above in the discussion of EPF&R's LOS standard, the fire district achieved 90% response times well below 8 minutes for both fire and emergency medical incidents as of 2009; in 2013 the mean response time for the first unit response was 7.4 minutes.

At this time, data is not available on actual performance regarding assembly of minimum acceptable response forces by incident type, due to limitations in the structure of the data and software used for data collection and reporting by East Pierce Fire & Rescue.

The City of Sumner currently owns approximately 202 acres of park and recreation space, with an additional 14.5 acres provided by school district recreational facilities. The Sumner Meadows Golf Course accounts for approximately 154 acres of the City's current park land. The City's other parks properties range in size from less than one acre to approximately 11 acres. The Golf Course is one of two City-owned recreational facilities in the northern portion of Sumner, the other being Riverbend Park, across the White (Stuck) River from the golf course. Riverbend Park is a mostly unimproved park of approximately 6.6 acres at the end of 16<sup>th</sup> Street E. The City's other park and recreation lands lie south of Elm Street E.

The City also maintains a trail system with both pedestrian and bicycle facilities. The City originally adopted the Sumner/Pacific Trail Plan in 1996 as a joint project with the City of Pacific. This plan was updated in 2008 to focus on City of Sumner trail projects. Existing trails follows the eastern edge of the golf course property north of the adjacent Riverbend Park, which includes a pedestrian/bicycle bridge and trailhead that provides access to regional trails north of the study area. An existing trail segment also follows the opposite bank of the White (Stuck) River and connects to the rest of the City's trail system to the south.

LEVEL OF SERVICE STANDARDS

The City’s Comprehensive Plan establishes the following level of service standards for parks and recreational facilities, based on resident population. There is no required level of service for golf courses. Additionally, the standards are population based rather than employment based.

**Exhibit 3-32. Park Level of Service Standards**

<b>Activity</b>	<b>Required Level of Service (Unit per population)</b>
Softball	1/2,000
Baseball	1/5,000
Soccer Fields	1/2,000
Football Fields	1/20,000
Tennis Courts	1/3,000
Basketball Courts	1/1,000
Volleyball Courts	1/5,000
Indoor Pool	1/20,000
Community Parks	1 acre/1,000
Urban Trails	0.95 mile/1,000
Picnic Shelter/Gazebo	1/8,500
Picnic Tables	1/250
Horseshoes	None
Children’s Play Area	1/1,700
Community Center	None
Golf Course	None
Regional Park	1 acre/710

Source: City of Sumner, 2010.

Note: The City’s Comprehensive Plan and Trail Master Plan do not establish a LOS standard for trails, but the 1996 Sumner/Pacific Trail Master Plan established a desired standard of 0.95 mile per 1,000 residents (adopted by Ord. 1911, December 1999).

**Schools**

Educational services in the study area are provided by the Dieringer School District and the Auburn School District. Dieringer provides elementary and middle school education, but the district does not operate a high school, and high school education is provided by Auburn School District. The Dieringer School District operates three schools: Lake Tapps Elementary (Grades 1-3), Dieringer Heights Elementary (Grades 4-5 and Kindergarten), and North Tapps Middle School (Grades 6-8). Students in Grades 9-12 attend Auburn Riverside High School, operated by the Auburn School District. Dieringer students have the option to waive into the Sumner High School as well.

**Solid Waste**

Solid waste collection services in Sumner are provided by private hauler DM Disposal. Collected municipal waste is hauled to Pierce County solid waste transfer facilities, where it is transferred to large-capacity containers for transportation to the privately owned LRI Landfill in southern Pierce County. The study area is

located within Sumner city limits, and all developments in Sumner are required to obtain curbside garbage collection. (City of Sumner, 2010)

DM Disposal also provides curbside recycling and yard waste services in Sumner upon request. Unlike garbage collection, curbside recycling and yard waste collection are not mandatory in Sumner, though they are encouraged. Collected recyclable materials and yard waste are hauled to transfer stations for sorting, and in the case of yard waste, delivery to the Hidden Valley Compost Factory in Puyallup. (Murrey Disposal, 2014; LRI Services 2014)

### 3.9.2 Impacts

#### *Impacts Common to All Alternatives*

##### LAW ENFORCEMENT

Under all alternatives, new development in the project area would increase demand for law enforcement services, though the precise nature and level of demand would vary by alternative. While the City's adopted LOS standards for police officer staffing and police building space are based on resident population, development of non-residential uses would still require police patrols and responses to reported crimes.

##### FIRE AND EMERGENCY MEDICAL SERVICE

Under all alternatives, new development in the project area would increase demand for fire protection and emergency medical services, though the precise nature and level of demand would vary by alternative. Both the City's and EPF&R's LOS standards are based on a combination of incident response time and adequate fire crew staffing; neither standard directly correlates fire department staffing with population or employment growth.

Increased intensity of development would, however, increase the likelihood that fire protection or emergency medical services would be required, though industrial, commercial, and residential uses would generate different levels and types of demand. Residential development generally accounts for a relatively high percentage of emergency responses, and a majority of these are often emergency medical incidents.

If industrial uses involved the handling of hazardous materials, firefighters and emergency responders would require specialized equipment and training. Future project applicants would be required to work cooperatively with EPF&R, as well as the City to ensure that all necessary equipment and services were available to respond to potential incidents that could be associated with a particular use. Existing industrial uses currently have the potential for these risks, so emergency service providers are likely alerted and prepared for the risk.

##### PARKS AND RECREATION

Under all Action Alternatives, the Sumner Meadows Golf Course is assumed to redevelop as a non-recreational facility. While this substantially reduces the City's overall inventory of recreational land, the golf course was declared surplus in 2013. Furthermore, the City's Comprehensive Plan does not maintain a level-of-service standard for golf courses. As such, none of the alternatives would create a LOS deficit associated with redevelopment of the golf course. See Section 3.6 regarding City parks and open space policies.

With the exception of Alternative 3, no residential development would occur. Alternatives 1, 2, 4, and 5 would not generate any additional demand for park space due to population growth.

As described under Affected Environment, several City trails run through the area, providing non-motorized connections to other regional trail networks. Redevelopment of the golf course site for industrial uses, while not directly impacting existing trails, could alter the aesthetic quality of the surrounding environment (see Section 3.5), but given the river corridor is treed and vegetated and given the City requires design review of industrial development, impacts to visual quality can be mitigated. It is likely that all Action Alternatives would

result in employment growth that could increase use of the trails; some alternatives would also increase residential demand for trails (Alternatives 3 and 5).

#### SCHOOLS

With the exception of Alternatives 3 and 5, no residential development would occur, generating no new students. Alternatives 1, 2, and 4 would create no additional demand for educational services.

#### SOLID WASTE

As described under Affected Environment, solid waste collection in the study area is provided by private haulers under franchise agreement with the City of Sumner. Development of the project area under all alternatives would increase the amount of solid waste generated and directed to regional landfills and recycling and composting centers. As stated under Affected Environment, residential solid waste and recycling collection services are available upon request throughout Sumner. Commercial and industrial businesses would likely contract privately for waste collection. No significant adverse impacts to solid waste are anticipated under any of the alternatives.

### ***Alternative 1 Sumner Meadows Docket Application***

#### LAW ENFORCEMENT

See the discussion under Impacts Common to All Alternatives. There will be an increase in demand for police services given greater employment. With mitigation, no significant adverse impacts to Law Enforcement are anticipated under Alternative 1.

#### FIRE AND EMERGENCY MEDICAL SERVICE

See the discussion under Impacts Common to All Alternatives. Alternative 1 would increase the potential for industrial development in the project area, creating a potential risk of fire and release of any hazardous materials depending on the uses locating in the light industrial buildings; however, all development would be subject to the Uniform Fire Code and regular fire inspections to minimize impacts.

#### PARKS AND RECREATION

See the discussion under Impacts Common to All Alternatives. With conversion of the golf course to Light Manufacturing uses, there would be a reduction in recreation and open space. However, the City has no level of service for golf courses. With incorporation of mitigation, no significant adverse impacts to Parks and Recreation are anticipated under Alternative 1.

#### SCHOOLS

Alternative 1 would not generate any additional residential capacity or result in any additional students. No impacts to schools are anticipated.

#### SOLID WASTE

See the discussion under Impacts Common to All Alternatives. Additional employment would increase demands on solid waste and recycling collection and disposal. With mitigation, no significant adverse impacts to solid waste are anticipated under Alternative 1.

### ***Alternative 2 Areawide Industrial Alternative***

#### LAW ENFORCEMENT

See the discussion under Impacts Common to All Alternatives. There will be an increase in demand for police services given greater Light Manufacturing employment in place of vacant, agriculture, and recreational/open space uses. No significant adverse impacts to Law Enforcement are anticipated under Alternative 2.

FIRE AND EMERGENCY MEDICAL SERVICE

See the discussion under Impacts Common to All Alternatives. Under Alternative 2, future development in the project area would be entirely industrial in nature, with impacts similar to Alternative 1 though there would be a greater Light Manufacturing area.

PARKS AND RECREATION

See the discussion under Impacts Common to All Alternatives. With conversion of the golf course to Light Manufacturing uses, there would be a reduction in recreation and open space. However, the City has no level of service for golf courses. With incorporation of mitigation, no significant adverse impacts to Parks and Recreation are anticipated under Alternative 2.

SCHOOLS

Alternative 2 would not generate any additional residential capacity or result in any additional students. No impacts to schools are anticipated.

SOLID WASTE

See the discussion under Impacts Common to All Alternatives. Additional employment would increase demands on solid waste and recycling collection and disposal. With mitigation, no significant adverse impacts to solid waste are anticipated under Alternative 2.

***Alternative 3 Areawide Industrial and Residential Alternative***

LAW ENFORCEMENT

In addition to the impacts discussed under Impacts Common to All Alternatives, Alternative 3 would generate capacity for approximately 990 additional residents. Based on the City's adopted LOS standard for police staffing, this increase in population would require the services of 1.98 additional police officers.

The increased population under Alternative 3 would also generate a demand for approximately 436 square feet of office space for the police department (based on the adopted LOS standard of 0.44 square feet per capita). The Sumner Police Department, however, has an excess of office space, and the estimated population growth under Alternative 3 would not require the acquisition of any additional space.

FIRE AND EMERGENCY MEDICAL SERVICE

In addition to the impacts discussed under Impacts Common to All Alternatives, Alternative 3 would increase the residential development capacity of the project area, generating additional demand for fire and emergency medical services. Alternative 3 would generate the largest increase in demand out of all the alternatives; it would generate the second-most job capacity, as well as nearly 1,000 new residents.

In addition to an increased demand for service, Alternative 3 would locate high-density residential development in a predominantly industrial area and immediately adjacent to several properties planned for industrial development. Depending on the precise industrial uses proposed on adjacent properties, residents could lie adjacent to uses that may use hazardous materials.

PARKS AND RECREATION

Alternative 3 would create capacity for 990 additional residents in the project area, increasing demand for parks and recreational facilities. Based on the LOS standards listed under Affected Environment, Alternative 3 would result in demand for the following recreational facilities:

- 0.49 additional softball fields;
- 0.20 additional baseball fields;
- 0.49 additional soccer fields;

- 0.33 additional tennis courts;
- 1 additional basketball court;
- 0.20 additional volleyball courts;
- 1 additional community park;
- 0.12 additional picnic shelters/gazebos;
- 4 additional picnic tables;
- 0.58 additional children's play areas;
- 1.39 additional acres of regional park land; and
- 0.94 mile of additional urban trails.

Residential development under Alternative 3 would generate negligible demand for football fields and indoor pools. While the City currently has a surplus of softball, baseball, and football fields, as well as tennis and basketball courts, development under Alternative 3 would exacerbate deficiencies in volleyball courts, community parks, and picnic facilities (shelters and tables).

#### SCHOOLS

Residential development under Alternative 3 would generate additional demand for educational services. The Dieringer School District, which provides elementary and middle school education in the study area, has adopted a student generation factor of 0.242 students per household for multifamily residences. Alternative 3 would create capacity for 450 new residential units, equating to 109 new students. As discussed under Affected Environment, students from the study area would also attend Auburn Riverside High School when they reach Grade 9. The City of Sumner does not currently collect school impact fees on behalf of Auburn School District, and it collects impact fees only for single family development served by the Dieringer School District. As such, multifamily residential development under Alternative 3 would increase demand on school facilities without providing any impact fee funding to the affected school districts.

#### SOLID WASTE

See the discussion under Impacts Common to All Alternatives. Additional employment and residences would increase demands on solid waste and recycling collection and disposal. With mitigation, no significant adverse impacts to solid waste are anticipated under Alternative 3.

#### ***Alternative 4 Offsite Alternative***

##### LAW ENFORCEMENT

See the discussion under Impacts Common to All Alternatives. There will be an increase in demand for police services given greater employment; however the employment increase is the lowest of studied alternatives. No significant adverse impacts to Law Enforcement are anticipated under Alternative 4.

##### FIRE AND EMERGENCY MEDICAL SERVICE

See the discussion under Impacts Common to All Alternatives. Alternative 4 would increase the potential for industrial development in the project area, thereby increasing the potential of hazardous materials handling, depending on the precise uses developed. Future development under Alternative 4, however, is anticipated to be less intense than under other alternatives, as described in Chapter 2. As a result, Alternative 4 is anticipated to generate the least demand for fire and emergency medical services of the Action Alternatives.

### PARKS AND RECREATION

See the discussion under Impacts Common to All Alternatives. No significant adverse impacts to Parks and Recreation are anticipated under Alternative 4 as there would be no land use change on the golf course, and development of the City's agricultural land would have the lowest employment creating the least demand for recreation services of the Action Alternatives.

### SCHOOLS

Alternative 2 would not generate any additional residential capacity or result in any additional students. No impacts to schools are anticipated.

### SOLID WASTE

See the discussion under Impacts Common to All Alternatives. Alternative 4 would produce the fewest new employees of the studied Action Alternatives and create the lowest demand on solid waste and recycling collection services. No significant adverse impacts to solid waste are anticipated under Alternative 4.

### ***Alternative 5 No Action Alternative***

### LAW ENFORCEMENT

See the discussion under Impacts Common to All Alternatives. There would be growth according to adopted plans that has been anticipated in City public service planning efforts (City of Sumner 2010). No significant adverse impacts to Law Enforcement are anticipated under the No Action Alternative.

### FIRE AND EMERGENCY MEDICAL SERVICE

Under the No Action Alternative, no changes would be made to comprehensive plan land use designations or zoning in the project area. Vacant parcels could potentially develop according to current zoning, generating demand for fire and emergency medical services. While development under the No Action Alternative, as described in Chapter 2, is anticipated to be less intensive than Alternatives 1, 2, or 3, it would be more intensive than Alternative 4, thereby potentially generating a greater demand for fire protection and emergency medical services.

### PARKS AND RECREATION

See the discussion under Impacts Common to All Alternatives. In the wider study area, current plan and zoning designations, particularly on private parcels north and south of Stewart Road have some commercial and mixed use zoning that could allow for 39 dwellings and 86 persons as well as nearly 500 jobs. However, growth under the No Action Alternative has been considered in City plans (City of Sumner 2010); and would represent less than 10% of the demand of Alternative 3 (86 versus 990 population increase). No significant adverse impacts to Parks and Recreation are anticipated under the No Action Alternative.

### SCHOOLS

In the wider study area, current plan and zoning designations, particularly on private parcels north and south of Stewart Road have some commercial and mixed use zoning that could allow for 39 dwellings and 86 persons as well as nearly 500 jobs. The 39 homes could generate about 9 students. No impacts to schools are anticipated.

### SOLID WASTE

See the discussion under Impacts Common to All Alternatives. Additional employment and residences would increase demands on solid waste and recycling collection and disposal. With mitigation, no significant adverse impacts to solid waste are anticipated under Alternative 5.

### 3.9.3 Mitigation Measures

#### *Incorporated Plan Features*

None.

#### *Applicable Regulations and Commitments*

- All new development will be required to comply with the provisions of Sumner Municipal Code (SMC) Title 15 – Buildings and Construction, which includes the City’s building codes and fire code. Specifically, Chapter 15.24.010 adopts the International Fire Code, and Chapter 15.28 mandates minimum fire flow requirements and specifies fire hydrant locations and spacing.
- The City could regularly update its park and trail mitigation fee ordinance (Ordinance No. 1911 adopted on December 20, 1999) to help ensure that park infrastructure keeps pace with development.
- The City and EPF&R would continue to work with mutual aid partners for backup response to emergency incidents. EPF&R would continue to participate in the Pierce County Hazardous Incident Team (HIT), a multi-jurisdictional response team.
- National and state industry standards address fire district response times and staffing minimums (Fire Protection Association Standard 1710 and State’s Labor & Industries safety requirements (WAC 296-305-05001).
- The City participates in an inter-local agreement with Pierce County for solid waste and recycling services.

#### *Other Potential Mitigation Measures*

##### POLICE SERVICES

- The City should continue to monitor demand for services and review staffing levels, particularly police, and equipment needs through the normal annual budgeting process.

##### FIRE AND EMERGENCY MEDICAL SERVICES

- The City and EPF&R should review the precise fire protection and emergency medical needs of proposed development prior to building permit issuance to ensure that EPF&R can adequately respond to anticipated incidents, including specialized needs for handling hazardous materials if applicable.

##### PARKS AND RECREATION

- Industrial development in the study area should be required to provide adequate visual screening along trail corridors to preserve aesthetic qualities. On-site trail access should be preserved where public safety allows.
- The City should consider the collection of park mitigation fees for large developments such as large multifamily proposals that have the potential to increase demand on City parks. The City may also require onsite open space for use by residents.

##### SCHOOLS

- The City, along with Dieringer School District and Auburn School District, should consider modification of the City’s impact fees to account for multifamily residential development in the service areas of these districts.

##### SOLID WASTE

- Future industrial and multifamily developments would contract directly for solid waste services with service providers, which in Sumner is DM Disposal.

### **3.9.4 Significant Unavoidable Adverse Impacts**

Under all Alternatives, future development will increase demand for public services. With the incorporation of the above mitigation measures, no significant unavoidable adverse impacts on public services are anticipated.

## 3.10 Utilities

### 3.10.1 Affected Environment

#### *Water*

The City of Sumner provides potable water service within city limits, as well as some adjacent areas. In recent years, the City has expanded its service area by assuming control of portions of other water districts that served areas within Sumner or adjacent to the city limits. The Sumner water system includes approximately 85 miles of transmission mains in sizes ranging from 2 inches to 18 inches in diameter and has a source capacity of approximately 3.72 million gallons per day (mgd). (City of Sumner, 2009)

Existing potable water infrastructure in the vicinity of the Sumner Meadows Golf Course includes the following (KPG, 2013):

- 12-inch ductile iron main in the East Valley Highway right-of-way, located east of the golf course property;
- 8-inch ductile iron main that branches off the 12-inch East Valley Highway Main, enters the Golf-Course property near the southern property line, and then extends northward toward the existing club house;
- 12-inch ductile iron main in the right-of-way of Stewart Road SE that terminates near the northern entrance to the golf course property; and
- 16-inch ductile iron main in the right-of-way of 24<sup>th</sup> Street SE, south of the golf course property.

Water system maps (KPG, 2013) show existing water infrastructure along Stewart Road SE west of the golf course, with the potential for service to future development on undeveloped and agricultural properties.

#### WATER DEMAND

The City's 2009 Water System Plan establishes a planning-level estimated average demand of 171 gallons of water per capita per day for the planning period 2009 – 2029. This estimate was derived from total estimated demand for the planning period, divided by total projected population at five-year increments. While this number is useful for system-wide planning, it is based on total water consumption and therefore includes water consumed for non-residential uses. The Water System Plan also contains a breakdown of annual water consumption by land use category for the period 1997-2008. During that period, the average total annual water consumption for multifamily residential uses was 41,098,600 cubic feet (307,438,899 gallons). The City's Water System Plan estimated 2009 population at 9,881 residents, resulting average residential water consumption of 85.24 gallons per capita per day (31,114 gallons per year). For the same period, total average annual water consumption for commercial and industrial uses was 16,813,500 cubic feet (125,773,723 gallons). City employment in 2008 was estimated to be approximately 9,345 employees (ICF International, 2011), resulting in average water consumption per employee of approximately 36.87 gallons per day (13,459 gallons per year).

#### *Wastewater*

The City of Sumner's wastewater system has been operation since 1927, and its first wastewater treatment plant (WWTP) was brought into service in 1957 (City of Sumner, 2000). The City-provided sanitary sewer service area covers the Sumner city limits and portions of the Sumner Urban Growth Area (UGA). It contains over 33 miles of sewer mains and 15 pump stations. The WWTP was last upgraded in 2004 and has a permitted treatment capacity of approximately 4.6 million gallons per day (mgd). As described in the 2010 Final EIS, this capacity is adequate to serve a population of approximately 19,125, which is well in excess of Sumner's projected 2030 population (ICF International, 2010).

Wastewater infrastructure in the vicinity of the project site includes the following (KPG, 2013):

- **Pump Station 14:** Located at the intersection of 24<sup>th</sup> Street E and 148<sup>th</sup> Avenue E at the southern edge of the golf course property, this pump station has a capacity of approximately 750 gallons per minute (gpm).
- **Pump Station 15:** Located approximately 900 feet west of the golf course property, this pump station has a pumping capacity of approximately 500 gpm.
- **East Valley Highway Force Main:** An eight-inch diameter sewer force main is located to the east of the golf course property in the right-of-way for the East Valley Highway. The force main discharges to gravity conveyance near the intersection of East Valley Highway and 24<sup>th</sup> Street E, which eventually discharges to Pump Station 14.

Wastewater service lines are located along the frontage of Stewart Road west of the golf course along the private properties considered in Alternatives 2 and 3, and on 24<sup>th</sup> Street East south of the golf course.

### WASTEWATER FLOWS

The City of Sumner Sanitary Sewer Comprehensive Plan, last updated in 2000, establishes planning-level wastewater flow estimates by land use zone. Average daily flow estimates for relevant zones are excerpted below (City of Sumner, 2000):

- General Commercial (GC): 1,500 gallons per acre
- Light Industrial (M-1): 1,300 gallons per acre
- High Density Residential (HDR): 4,600 gallons per acre

### ***Stormwater***

The Sumner Valley has historically been drained to lower the natural water table, control flooding, and create land that was more conducive for agriculture. As more intensive commercial/industrial and residential development has occurred, expansion of the stormwater system has been necessary to collect and convey stormwater to the rivers and to prevent flooding (City of Sumner 2010).

The City's 2011 Stormwater Comprehensive Plan identifies several stormwater improvements in the area including but not limited to:

- White (Stuck) River Levee Improvements
- Golf Course Culvert Improvements
- 24<sup>th</sup> Street Setback Levee

Stormwater infrastructure in the golf course area is relatively limited. The Golf Course property is currently graded with artificial hills and other landscape features, allowing drainage via ditches and swales. The location of the site adjacent to the White (Stuck) River on the west and Dieringer Slough on the south means that all of the stormwater generated onsite eventually drains to the river. Onsite ponds provide immediate detention for stormwater, and these ponds eventually discharge to the river either through a pair of 24-inch pipes on the west side of the property or through a single 24-inch pipe at the southern end of the property that discharges stormwater to the Dieringer Slough. No stormwater treatment features are currently present on the property.

### STORMWATER DRAINAGE FLOWS AND IMPERVIOUS SURFACE

The amount of stormwater drainage resulting from development is closely linked to the level of impervious surface coverage; the greater the coverage of impervious surfaces, the less water is able to infiltrate on-site, and the greater the amount of stormwater that must be conveyed and treated. The City's zoning code prescribes maximum impervious surface coverage limits by zoning district. Limits for relevant zones are excerpted below:

- Agriculture (AG): 25%

- General Commercial (GC): 75%
- Light Industrial (M-1): 70%
- High Density Residential (HDR): 45%

### ***Power and Natural Gas***

Puget Sound Energy (PSE) provides both electric and natural gas services in Sumner, including the study area. PSE is the oldest local energy provider in Washington and maintains nearly 2,400 miles of electric distribution lines and nearly 2,500 miles of natural gas pipeline in Pierce County. PSE natural gas supply mains run along the southern property line of the golf course site and along East Valley Highway, east of the project study area. Electrical transmission lines cross the southern half of the study area and also pass immediately north of the golf course property.

While natural gas is a non-essential utility, the Washington Utilities and Transportation Commission (WUTC) requires providers of electricity to provide service on demand in support of growth that occurs in their service areas. As such PSE conducts its own ongoing capacity planning process to ensure their power supply and infrastructure are adequate to meet anticipated future needs.

### ***Telecommunications***

Telephone service in Sumner is provided by CenturyLink (formerly Qwest Communications), who owns a main feeder line in Fryar Avenue in western Sumner and a primary feed line along the BNSF railroad that runs along the eastern boundary of the golf course property. CenturyLink commonly co-locates its facilities, including both underground and aerial lines, with the facilities of electric power providers, such as Puget Sound Energy. The BNSF right-of-way is also the location of a Sprint fiber optic line for high-speed data transfer.

Telecommunication providers, such as CenturyLink and Sprint, provide their services upon demand from consumers and engage in their own capacity planning processes to ensure that they have adequate facilities to accommodate future growth in their service areas. In addition, providers of essential utilities, such as landline telephone service, are required by the Washington Utilities and Transportation Commission (WUTC) to regularly evaluate the capacity of their facilities.

## **3.10.2 Impacts**

### ***Impacts Common to All Alternatives***

#### **WATER**

Development under all alternatives would increase water demand in the study area, though precise levels of demand generated by each alternative would vary by the intensity of development proposed. The Golf Course site represents the majority of employment capacity studied in this SEIS, and the focus of the utilities analysis is on that site. Based on historical water demand levels for various types of development (residential, commercial, industrial, etc.), as documented in the City's 2009 Water System Plan, the projected demand under each alternative is tabulated in Exhibit 3-33.

**Exhibit 3-33. Projected Water Demand by Alternative**

Scenario/Alternative	Total Population 2030	Total Housing 2030	Total Jobs 2030	Daily Water Demand	
				Gallons	% <sup>1</sup>
Action Alternatives					
Alternative 1 - Sumner Meadows Docket Application	-	-	3,523	129,906	3.5%
Alternative 2 - Areawide Industrial Alternative	-	-	3,752	138,350	3.7%
Alternative 3 - Areawide Industrial and Residential Alternative	990	450	3,651	219,018	5.9%
Alternative 4 - Offsite Alternative	-	-	302	11,136	0.3%
No Action Alternative					
Alternative 5 - No Action Alternative (Golf Course)	-	-	160	5,900	0.2%
Alternative 5 - No Action Alternative (Areawide Stewart Road)	86	39	495	25,584	0.7%
Alternative 5 - No Action Alternative (AG property Offsite)	-	-	-	-	-

<sup>1</sup> Percent of total source capacity

Source: City of Sumner Water System Plan, 2009.

According to the City’s 2009 Water System Plan, the City’s water system currently has adequate capacity for the anticipated average day demand under all of the alternatives through 2029, but does not have adequate capacity to meet projected 2029 maximum daily demand. However, through a series of planned source improvements, new interties, new source construction and water right transfers. The current shortfall would be filled and a surplus would be created by 2029. The anticipated increase in water demand under each of the alternatives appears to fall within the 20-year estimated maximum-day capacity anticipated by the Water System Plan.

An evaluation of the water and wastewater systems in the vicinity of the golf course property was prepared in February, 2013 by KPG, Inc. (see Appendix I). The evaluation reviewed the capacity of the water infrastructure available in the area, compared with estimated water demand from conceptual land use types anticipated to occur on the golf course site. The analysis indicates that the existing water infrastructure would be capable of supplying adequate water supply to the golf course property, provided that the Capital Improvement Project D12, as identified in the City’s 2009 Water System Plan, is completed prior to development. Project D12 would extend the 12-inch main in Stewart Road to connect with the on-site 8-inch water main, as well as continuing under the BNSF railroad tracks to connect to the 12-inch main in East Valley Highway. The analysis also assumed installation of a 12-inch water main along 148<sup>th</sup> Avenue E to connect the golf course site to the existing 16-inch water main in 24<sup>th</sup> Street. Looping these mains would increase flow and create system redundancy, which is of particular benefit to fire flow needs. With these improvements in place, adequate water supply should be available under all on-site alternatives, though these initial estimates were based on a conceptual site plan. Precise water supply needs should be confirmed through detailed analysis prior to building permit issuance.

**WASTEWATER**

Development under all alternatives would increase wastewater flows from the study area, requiring conveyance and treatment, thus placing greater demand on the City’s wastewater collection system. The flows generated by each alternative would vary by the intensity of development proposed and are tabulated below in Exhibit 3-34.

**Exhibit 3-34. Projected Sewer Flows by Alternative**

Zoning Classification	Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	Developable Acres	gpd								
Agriculture	96.99	24,247.50	96.99	24,247.50	96.99	24,247.50	-	-	96.99	24,247.50
General Commercial	24.63	36,945.00	-	-	-	-	53.04	79,560.00	53.04	79,560.00
HDR	9.75	44,850.00	-	-	25.10	115,460.00	9.75	44,850.00	9.75	44,850.00
Light Manufacturing	170.74	221,962.00	205.12	266,656.00	180.02	234,026.00	23.82	30,969.12	15.43	20,059.00
<b>Study Area Total</b>	<b>302.11</b>	<b>328,004.50</b>	<b>302.11</b>	<b>290,903.50</b>	<b>302.11</b>	<b>373,733.50</b>	<b>86.61</b>	<b>155,379.12</b>	<b>175.21</b>	<b>168,716.50</b>

Source: City of Sumner GIS, City of Sumner Sanitary Sewer Comprehensive Plan.

Note: Alternatives 1, 2, and 3 assume that the City retains ownership of river frontage as open space. Alternative 4 assumes the entire golf course is retained and remains a golf course; only a small area of Alternative is developable as light manufacturing. Alternative 5 assumes both the golf course and agricultural land remain in current use.

Similar to the evaluation of the water system, the wastewater analysis estimated project sewer flows from new development based on assumed land use type and compared these to the capacity of nearby sewer infrastructure. Development of the golf course property was estimated to contribute an additional 178 gallons per minute (gpm) to peak sewer flows in this basin; the remainder of the basin contributes an estimated 236 gpm. The nearby existing 8-inch force main and 12-inch gravity main are anticipated to have sufficient capacity to absorb the additional flow. Sewer flows from these mains discharge to Pump Station 14, which has a capacity of approximately 750 gpm. KPG’s analysis estimated that the addition of sewer flows from the golf course property would generate a combined flow to Pump Station 14 of approximately 785 gpm during peak flow. However, existing development in the sewer basin is split between industrial and residential uses, and flow patterns for these land use type differ, placing peak flows at different times of the day. As such, it is possible that peak flows at Pump Station 14 may not reach estimated levels. Due to the potential for sewer system back-ups in the event that flows exceed pump capacity and the fact that the KPG analysis was based on conceptual information, the report recommended that a detailed analysis of sewer flows be conducted by future project applicants prior to issuance of a building permit.

Regarding development north and south of Stewart Road, the City would require future site specific applicants to demonstrate availability of sewer service and to ensure infrastructure is sized per City standards for adequate sewer collection.

**STORMWATER**

Additional development will substantially increase the amount of impervious surfaces in the study area. The maximum level of impervious surface coverage allowed under each alternative is shown in Exhibit 3-35. Regarding development north and south of Stewart Road, as well as on the golf course, future development would be required to comply with the City’s stormwater manual (2005 Ecology manual as amended) and provide low impact development techniques:

*“To meet the intent of the NPDES permit issued by the Washington State Department of Ecology of providing treated stormwater discharges to the river systems exempt from flow control and to meet the intent of other permit requirements, the city of Sumner requires that all applicants for residential, commercial, institutional and government agency projects implement low impact development (LID) strategies and practices in their stormwater site plan. LID standards and criteria are set forth in the manuals and the Sumner Development Specifications and Standard Details as therein referenced.”*

**Exhibit 3-35. Maximum Impervious Surface Coverage by Alternative**

Zoning Classification	Maximum Impervious Surface Coverage	Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
		Developable Acres	Imp. Acres	Developable Acres	Imp. Acres	Developable Acres	Imp. Acres	Developable Acres	Imp. Acres	Developable Acres	Imp. Acres
Agriculture	25%	96.99	24.25	96.99	24.25	96.99	24.25	-	-	96.99	24.25
General Commercial	75%	24.63	18.47	-	-	-	-	53.04	39.78	53.04	39.78
HDR	45%	9.75	4.39	-	-	25.10	11.30	9.75	4.39	9.75	4.39
Light Manufacturing	70%	170.74	119.52	205.12	143.58	180.02	126.01	23.82	16.68	15.43	10.80
<b>Study Area Total</b>		<b>302.11</b>	<b>166.63</b>	<b>302.11</b>	<b>167.83</b>	<b>302.11</b>	<b>161.56</b>	<b>86.61</b>	<b>60.84</b>	<b>175.21</b>	<b>79.22</b>

Source: City of Sumner GIS, Sumner Municipal Code Title 18.

Note: Alternatives 1, 2, and 3 assume that the City retains ownership of river frontage as open space. Alternative 4 assumes the entire golf course is retained and remains a golf course. Alternative 5 assumes both the golf course and agricultural land remain in current use.

An evaluation of stormwater infrastructure in the vicinity of the golf course property was prepared in February, 2013 by Barghousen Consulting Engineers (see Appendix I). The evaluation reviewed the stormwater infrastructure available in the area, compared with estimated drainage flows based on a conceptual light industrial site plan. Assuming 95% impervious coverage, the evaluation concluded that it would be possible to provide adequate on-site drainage using a combination of existing and new discharge infrastructure while not adversely affecting water quality in the White (Stuck) River. However, because this analysis was based on a conceptual site plan, the study recommended that a detailed analysis of stormwater needs be conducted by future development applicants prior to issuance of a building permit.

Similarly, future development north and south of Stewart Road would be required to analyze stormwater needs and compliance with City standards prior to issuance of a building permit.

**POWER AND NATURAL GAS**

Under all alternatives, development in the study area will increase the consumption of electricity and natural gas, though the precise level of consumption will vary based on the specific uses developed. Both electric power and natural gas are readily available in the study area, and PSE conducts continuous resource planning to ensure adequate energy supply within its service area. No significant impacts associated with Power and Natural Gas are anticipated under any of the Alternatives.

**TELECOMMUNICATIONS**

As described under Affected Environment, a variety of telecommunications services are available in the study area. While development in the area would likely require additional installation of telecommunication infrastructure (phone lines, fiber optic cables, etc.), these are private facilities owned and operated by private service providers. The cost for these system improvements would be borne by the individual service providers, and no significant impacts associated with Telecommunications are anticipated under any of the Alternatives.

**Alternative 1 Sumner Meadows Docket Application**

**WATER**

As shown in Exhibit 3-33, potential development under Alternative 1 could accommodate up to 3,523 new employees by the year 2030. Based on historical water demand for employment uses, this would require approximately 129,906 additional gallons per day. This represents approximately 3.5% of the water system’s current source capacity. Due to variation in water needs between various commercial and industrial uses, precise water supply needs should be analyzed at the time of permit application and associated SEPA review.

City codes and other mitigation measures would be applied to ensure adequate water system function and water supply.

WASTEWATER

As shown in Exhibit 3-34, Alternative 1 would result in approximately 328,005 gallons of additional wastewater flow by the year 2030. The City's WWTP currently has excess treatment capacity for both influent and solids, and development under this alternative is not anticipated to result in significant impacts to treatment capacity. As described under Impacts Common to All Alternatives, localized improvements to conveyance infrastructure may be necessary, depending on individual project designs. Precise wastewater service needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate system function.

STORMWATER

As shown in Exhibit 3-35, Alternative 1 would allow up to 167 acres of impervious surface coverage in the study area, increasing the amount of stormwater runoff requiring conveyance and treatment. As described under Impacts Common to All Alternatives, future development would be required to comply with the City's stormwater manual (2005 Ecology manual as amended) and provide low impact development techniques. With implementation of these requirements, no significant impacts are anticipated.

POWER AND NATURAL GAS

See discussion under Impacts Common to All Alternatives. No significant impacts on Power and Natural Gas are anticipated as a result of development under this alternative.

TELECOMMUNICATIONS

See discussion under Impacts Common to All Alternatives. No significant impacts on Telecommunications are anticipated as a result of development under this alternative.

***Alternative 2 Areawide Industrial Alternative***

WATER

As shown in Exhibit 3-33, potential development under Alternative 2 could accommodate up to 3,752 new employees by the year 2030. Based on historical water demand for employment uses, this would require approximately 138,350 additional gallons per day. This represents approximately 3.7% of the water system's current source capacity. Due to variation in water needs between various commercial and industrial uses, precise water supply needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate water system function and water supply.

WASTEWATER

As shown in Exhibit 3-34, Alternative 2 would result in approximately 290,904 gallons of additional wastewater flow by the year 2030. The City's WWTP currently has excess treatment capacity for both influent and solids, and development under this alternative is not anticipated to result in significant impacts to treatment capacity. As described under Impacts Common to All Alternatives, localized improvements to conveyance infrastructure may be necessary, depending on individual project designs. Precise wastewater service needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate system function.

STORMWATER

As shown in Exhibit 3-35, Alternative 2 would allow up to 168 acres of impervious surface coverage in the study area, increasing the amount of stormwater runoff requiring conveyance and treatment. As described

under Impacts Common to All Alternatives, future development would be required to comply with the City's stormwater manual (2005 Ecology manual as amended) and provide low impact development techniques. With implementation of these requirements, no significant impacts are anticipated.

POWER AND NATURAL GAS

See discussion under Impacts Common to All Alternatives. No significant impacts on Power and Natural Gas are anticipated as a result of development under this alternative.

TELECOMMUNICATIONS

See discussion under Impacts Common to All Alternatives. No significant impacts on Telecommunications are anticipated as a result of development under this alternative.

***Alternative 3 Areawide Industrial and Residential Alternative***

WATER

As shown in Exhibit 3-33, potential development under Alternative 3 could accommodate up to 3,651 new employees and 990 new residents by the year 2030. Based on historical water demand for employment and residential uses, this would require approximately 219,018 additional gallons per day. This represents approximately 5.9% of the water system's current source capacity. Due to variation in water needs between various commercial and industrial uses, precise water supply needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate water system function and water supply.

WASTEWATER

As shown in Exhibit 3-34, Alternative 3 would result in approximately 373,734 gallons of additional wastewater flow by the year 2030, the most of any of the alternatives. The City's WWTP currently has excess treatment capacity for both influent and solids, and development under this alternative is not anticipated to result in significant impacts to treatment capacity. As described under Impacts Common to All Alternatives, localized improvements to conveyance infrastructure may be necessary, depending on individual project designs. Precise wastewater service needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate system function.

STORMWATER

As shown in Exhibit 3-35, Alternative 3 would allow up to 162 acres of impervious surface coverage in the study area, increasing the amount of stormwater runoff requiring conveyance and treatment. As described under Impacts Common to All Alternatives, future development would be required to comply with the City's stormwater manual (2005 Ecology manual as amended) and provide low impact development techniques. With implementation of these requirements, no significant impacts are anticipated.

POWER AND NATURAL GAS

See discussion under Impacts Common to All Alternatives. No significant impacts on Power and Natural Gas are anticipated as a result of development under this alternative.

TELECOMMUNICATIONS

See discussion under Impacts Common to All Alternatives. No significant impacts on Telecommunications are anticipated as a result of development under this alternative.

***Alternative 4 Offsite Alternative*****WATER**

As shown in Exhibit 3-33, potential development under Alternative 4 could accommodate up to 302 new employees by the year 2030. Based on historical water demand for employment uses, this would require approximately 11,136 additional gallons per day. This represents approximately 0.3% of the water system's current source capacity. Due to variation in water needs between various commercial and industrial uses, precise water supply needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate water system function and water supply.

**WASTEWATER**

As shown in Exhibit 3-34, Alternative 4 would result in approximately 155,379 gallons of additional wastewater flow by the year 2030, the least of any alternative. The City's WWTP currently has excess treatment capacity for both influent and solids, and development under this alternative is not anticipated to result in significant impacts to treatment capacity. As described under Impacts Common to All Alternatives, localized improvements to conveyance infrastructure may be necessary, depending on individual project designs. Precise wastewater service needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate system function.

**STORMWATER**

As shown in Exhibit 3-35, Alternative 4 would allow the least amount of impervious surface coverage in the study area, approximately 61 acres. As described under Impacts Common to All Alternatives, future development would be required to comply with the City's stormwater manual (2005 Ecology manual as amended) and provide low impact development techniques. With implementation of these requirements, no significant impacts are anticipated.

**POWER AND NATURAL GAS**

See discussion under Impacts Common to All Alternatives. No significant impacts on Power and Natural Gas are anticipated as a result of development under this alternative.

**TELECOMMUNICATIONS**

See discussion under Impacts Common to All Alternatives. No significant impacts on Telecommunications are anticipated as a result of development under this alternative.

***Alternative 5 No Action Alternative*****WATER**

As shown in Exhibit 3-33, potential development under the No Action could accommodate up to 160 employees at the golf course site and an additional 495 employees in surrounding areas by the year 2030. The portion of the study area zoned High Density Residential could also accommodate up to 86 new residents. Based on historical water demand for employment and residential uses, this would require approximately 31,484 additional gallons per day. This represents approximately 0.8% of the water system's current source capacity. Due to variation in water needs between various commercial and industrial uses, precise water supply needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate water system function and water supply.

**WASTEWATER**

As shown in Exhibit 3-34, the No Action Alternative would result in approximately 168,717 gallons of additional wastewater flow by the year 2030. The City's WWTP currently has excess treatment capacity for

both influent and solids, and development under this alternative is not anticipated to result in significant impacts to treatment capacity. As described under Impacts Common to All Alternatives, localized improvements to conveyance infrastructure may be necessary, depending on individual project designs. Precise wastewater service needs should be analyzed at the time of permit application and associated SEPA review. City codes and other mitigation measures would be applied to ensure adequate system function.

#### STORMWATER

As shown in Exhibit 3-35, the No Action Alternative would allow up to 79 acres of impervious surface coverage in the study area, increasing the amount of stormwater runoff requiring conveyance and treatment. As described under Impacts Common to All Alternatives, future development would be required to comply with the City's stormwater manual (2005 Ecology manual as amended) and provide low impact development techniques. With implementation of these requirements, no significant impacts are anticipated.

#### POWER AND NATURAL GAS

See discussion under Impacts Common to All Alternatives. No significant impacts on Power and Natural Gas are anticipated as a result of development under this alternative.

#### TELECOMMUNICATIONS

See discussion under Impacts Common to All Alternatives. No significant impacts on Telecommunications are anticipated as a result of development under this alternative.

### 3.10.3 Mitigation Measures

#### ***Incorporated Plan Features***

- The Sumner Comprehensive Plan and Water, Wastewater and Stormwater functional plans would be applicable to all alternatives, including level of service and low impact development policies.

#### ***Applicable Regulations and Commitments***

- All development in Sumner is required to comply with the City's stormwater regulations as established in the City's 2011 Stormwater Comprehensive Plan and the 2010 Washington State Department of Ecology Stormwater Manual, adopted by SMC 13.48.030.
- Per the Army Corps of Engineers 24<sup>th</sup> Street Interchange permit condition K, the City is obligated to restrict any new development on 88 acres of City-owned property, adjacent to the east of the White River, to a maximum coverage of 40 percent impervious surfaces.

#### ***Other Potential Mitigation Measures***

#### WATER AND WASTEWATER

- Prior to issuance of a building permit, the applicant shall prepare and submit a detailed analysis of the effects of their proposed project design on the City's water and wastewater systems, to be reviewed by the City. The analysis must consider existing and planned utility infrastructure in the vicinity and estimate water demand and sewer flows resulting from the project.

#### STORMWATER

- Prior to issuance of a building permit, the applicant shall provide an analysis of projected stormwater flows resulting from the project for City review. The analysis shall include a stormwater control plan that illustrates flow control and water quality features, as well as discharge points, and demonstrate how the proposed project will meet the requirements of the City's stormwater design requirements and the latest edition of the Washington State Department of Ecology Stormwater Manual adopted by the City at the time of permit application.

### **3.10.4 Significant Unavoidable Adverse Impacts**

Under all alternatives, potential development in the study area would likely increase the use of utility services and would place greater demand on both public and private utility infrastructure. With the incorporation of the mitigation measures identified above, no significant unavoidable adverse impacts are anticipated.



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## 4.10 Utilities

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## 5.0 DISTRIBUTION LIST

The notice of availability for this Draft Supplemental Environmental Impact Statement (SEIS) was provided to the following agencies and individuals. Agencies indicated with an asterisk (\*) were provided with an electronic or paper copy of the Draft SEIS.

### 5.1 Federal, State, Tribal, Regional, County and City Agencies

#### 5.1.1 Federal Agencies

Federal Emergency Management Agency

National Marine Fisheries Services, Habitat Division

U.S. Army Corps of Engineers, Seattle District

U.S. Environmental Protection Agency, Environmental Evaluation Branch

U.S. Department of Agriculture/National Resource Conservation Service

U.S. Fish and Wildlife

#### 5.1.2 State of Washington Agencies

\*Department of Archaeology & Historic Preservation

\*Department of Commerce

\*Department of Corrections

\*Department of Ecology

\*Department of Fish and Wildlife

\*Department of Health

\*Department of Natural Resources

\*Department of Social and Health Services

\*Department of Transportation

\*Parks and Recreation Commission

\*Puget Sound Partnership

\*Recreation and Conservation Office

#### 5.1.3 Tribal

\*Puyallup Tribe

\*Muckleshoot Tribe

#### 5.1.4 Regional

\*Puget Sound Regional Council

\*Puget Sound Clean Air Agency

### **5.1.5 Counties**

\*Pierce County, Planning and Land Services  
Pierce County, Economic Development Board  
Pierce County, Office of the Assessor-Treasurer  
Tacoma-Pierce County Health Department

### **5.1.6 Cities**

\*City of Auburn, Planning Department  
\*City of Bonney Lake, Planning Department  
\*City of Edgewood, Planning Department  
\*City of Fife, Planning Department  
\*City of Orting, Planning Department  
\*City of Pacific, Planning Department  
\*City of Puyallup, Planning Department  
City of Lacey, Planning Department

## **5.2 Special Districts, Transportation, and Utilities**

Burlington North Santa Fe Railroad  
Cascade Water Alliance  
\*Dieringer School District  
\*East Pierce Fire and Rescue  
Pierce College  
\*Pierce Transit  
Puget Sound Energy  
Qwest  
\*Sumner School District  
Union Pacific Railroad Company  
Washington Utilities & Transportation Commission

## **5.3 City of Sumner**

\*Finance (Capital Facilities)  
\*Parks and Recreation  
\*Police  
\*Public Works  
\*Sumner City Council

\*Sumner Planning Commission

## **5.4 Boards and Associations**

Alderton-McMillin Community Planning Board

Puyallup River Watershed Council

Puyallup/Sumner Chamber of Commerce

Sumner Downtown Association

Master Builders Association

Lakeland Homeowner's

## **5.5 Community Organizations**

Cascade Land Conservancy

Futurewise

Audubon Society

Trout Unlimited

## **5.6 Newspapers**

Bonney Lake and Sumner Courier-Herald

Tacoma News Tribune

## **5.7 Citizens and Property Owners**

Property owners within 1,000 feet of the study area

Notices of the Draft SEIS availability and the June 5, 2014, public hearing (see Fact Sheet) will also be placed on the City's website, posted at City Hall and the local library, published in at least one local newspaper (i.e., Tacoma News Tribune), and emailed to interested parties.

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