

Appendix A: DRAFT SEIS COMMENT LETTERS





MUCKLESHOOT INDIAN TRIBE

Fisheries Division

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June 16, 2014

Mr. Ryan Windish, Planning Manager
City of Sumner
Community Development
1104 Maple Street, Suite 250
Sumner, WA 98390

RE: City of Sumner 2013 Comprehensive Plan Annual Amendments, Sumner Meadows Docket, Draft Supplemental Environmental Impact Statement

Dear Mr. Windish:

Our Habitat Program has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the City of Sumner’s 2013 Comprehensive Plan Annual Amendments: Sumner Meadows Docket. As you know, the DSEIS analyzes 5 potential alternatives for proposed changes to the City’s Comprehensive Plan, maps and development regulations. The study area includes the Sumner Meadows Golf Course property, as well as, several other adjacent properties depending on the alternative. We offer some comments in this cover letter and more specific comments attached in the interest of protecting and restoring the Tribe’s treaty protected fisheries resources.

Generally, we are concerned that all of the action alternatives are insufficient to protect the White River; its floodplain and Stewart Creek, a fish-bearing stream. Over the last several years, we have provided written comments on several projects and their associated environmental review proposed within the area reviewed by the SDEIS (i.e. Greenwater North Commerical project; 2010 Comp Plan amendments; 2012 Comp Plan amendments; Sumner Golf Course Sale, Central Well, etc.). We have consistently expressed concerns about the lack of a comprehensive floodplain management and river restoration effort needed in the lower White River to ensure that floodplain process and fish habitat are protected and restored over time. We specifically sent comments to the Scoping Notice for this project and asked that the City analyze all of the options from the City’s 2011 levee setback feasibility study as part of this SDEIS. Unfortunately, the SDEIS failed to do so and we remain concerned that floodplain protection and fish habitat restoration options will be precluded if any of the action alternatives are approved. Further, for several years, King County has been working on the “Countyline Levee Setback” project which will improve fish habitat and floodplain capacity, both of which are necessary on the White River. Additional levee setback projects are needed as we have suggested which may be precluded by all of the action all alternatives.

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The SDEIS notes that there will be a shortfall in municipal water to meet the 2029 maximum daily demand and the City is relying on in part on "new source construction and water right transfers" We have discussed our concerns with City staff for the proposed new water wells and water right transfers and have identified the need for the City to mitigate impacts to the White River and its groundwater sources. We have yet to resolve this issue with the City; however, the SDEIS concludes that there are no significant unavoidable adverse impacts without identifying this issue or mitigation measures. The floodplain issues, fish habitat issues, and water withdrawal issues are significant and require mitigation sequencing and specific measures for all unavoidable impacts so that there will be no significant adverse impacts.

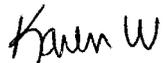
1-5

1-6

Our specific comments to the SDEIS are attached for your review. It would be useful if we could meet with City staff (and your consultants) to discuss these comments further before the City issues its Final SEIS for this project. Please call me at 253-876-3116 to set up such a meeting.

We appreciate the opportunity to comment on this proposal and look forward to working closely with the City to resolve these concerns.

Sincerely,



Karen Walter
Watersheds and Land Use Team Leader

Specific Comments to the Sumner 2013 Comp Plan Amendments SDEIS

1. The FSEIS needs to provide significant clarification regarding the extent of the study area and the various action alternatives. For example, Section 2.3.1 indicates that the study area is generally described as the area bounded by Stewart Road on the north; the BNSF railroad tracks to the east; on the south by 24th Street East; and on the west by the White River. However, Alternative 4 includes the city-owned properties south of 24th Street East which is not in the study area. These properties are currently identified as “Public-private utilities and facilities” in the Comprehensive Plan Map and zoned as “Agriculture” (see Exhibits 2-11 and 2-12, respectively). If this area is part of the Comprehensive Plan amendments, then the study area should be expanded to include these properties south of 24th Street and they should be included in the analysis for all of the alternatives, not just Alternative 4. Similarly, the FSEIS should explain why there are comprehensive plan and zoning changes proposed for the property north of Stewart Road if this area is also outside of the study area. It is very difficult to review the environmental effects of the proposed action alternatives with a study area that changes by alternative. 1-7
1-8

2. There should be some discussion about the status of the permits and the development proposals for the properties that are within the affected area, as some of them have gone through environmental review (i.e. Greenwater North [PLN-2010-00002] and Six Kilns Apartments[PLN2012-00044]), and where they fit into the environmental review baseline. Further, the development agreement for the Greenwater North project is referenced but it is not clear how this development agreement may or may not affect the alternatives or the environment (see Appendix C, page 2). Another issue is potential impacts to Stewart Creek, the fish-bearing water west of the Golf Course, which was relocated as part of the Stewart Road widening Phase 2 project. This stream and its associated buffer are part of a Corps-permitted mitigation site under NWS-2006-1347-SOD. The SDEIS lacks any discussion regarding potential impacts to Stewart Creek and its mitigation area as a result of the alternatives. In addition, there is an existing partial fish passage barrier on the levee road that conveys Stewart Creek to the White River, which needs to be replaced with a fish-passable structure. The culvert replacement project should be implemented, regardless of the Alternative chosen. Finally, the proposed 75 foot buffer on Stewart Creek under Alternative 3 (page 3-52) should be widened to provide the full suite of riparian functions necessary to create and maintain fish habitat in Stewart Creek and downstream. 1-9
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1-13

3. It is not clear which projects have permitted fill in the floodplain (see pages 1-5; 1-19; etc.) and how they were assessed in the SDEIS and Appendix F (Hydraulic Model by West Consultants). For example, the Greenwater North Commercial Project (PLN2010-00002) noted that there would be 200,000 to 400,000 cubic yards of fill material placed on the site, some of which would go into the 100-year floodplain. However, the extent of actual fill in the floodplain was not disclosed and nor is it apparent in the Hydraulic Model in Appendix F. More information is needed about which projects have permitted fill; how much fill is in the floodplain and their contributions and mitigation for floodplain fill impacts. 1-14

4. The DSEIS lacks an evaluation regarding the existing White River channel aggradation conditions that will likely worsen with time. This is an essential point as the SDEIS notes existing problems with flooding (see page 3-26) and the disclosure of likely increases in water elevations (with potential increases in flooding, Exhibit 3-10) for all of the action alternatives based on the Hydraulic Model in Appendix F. It should be noted that the Hydraulic Model is a 1-dimensional model which did not assess continued channel aggradation of the White River as documented in various USGS reports (see attached 2010 report from USGS and other publications are available on their website (<http://wa.water.usgs.gov/>)).

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Further, the 100-year floodplain encompasses many of the properties within the study area based on the 1987 FEMA FIRM map that we provided as part of our scoping comments. The SDEIS ignores this information and does not fully assess the floodplain hazard and the need to protect the White River floodplain areas from further filling.

1-17

We recommend that the FSEIS include a revised analysis of potential floodplain impacts that consider White River channel aggradation as determined by the USGS, along with changes in floodplain fill and subsequent increases in water elevations for each alternative. With this information, it is likely that other mitigation measures will be needed as noted below.

1-18

As part of this revised analysis in the FSEIS, there are several other mitigation measures that should also be fully described and analyzed. For example, floodplain and fish habitat impacts may be avoided if levee setback measures are implemented. Our scoping comments requested that the City's 2011 levee setback study by Parametrix be used to analyze each alternative for the study area. Unfortunately, the SDEIS lacks this analysis and levee setbacks are not identified as a potential mitigation measure. In addition, the City should revise its floodplain regulations to meet the "zero-rise standard" instead of the current 1 foot standard referenced in City regulations. Also, in previous responses to our comments for the Environmental Code Text Amendments (PLN 2010-00011), the City indicated that they would be updating the flood hazard regulations to address the draft floodplain ordinance by FEMA and NOAA Fisheries. We have not yet seen this updated ordinance and now would be a good time to do so to avoid missing opportunities to fully protect the White River floodplain.

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The SDEIS does identify floodplain filling mitigation actions 'A through H' (pages 3-34 and 3-35) which may be needed in addition to those recommend above, if they reduce the flooding hazard and do not adversely affect fish habitat. However, please note that many of these mitigation actions described are related to the 24th Street E bridge project, which is a separate action that will likely need mitigation for its own floodplain fill separate from this process as this project is under its own environmental review. Consequently, the FSEIS should assume that the 24th Street E project and its associated mitigation is part of the environmental baseline, and then assess the land use action alternatives for the Comp Plan amendments and their associated floodplain fill actions separately.

1-22

5. The description of the annual flood events on page 3-26 appears to be in error. The 1% annual chance (i.e. the 100 year event) is described as being both 15,500 cfs and 2,500 cfs in the White River. 1-23

6. It is unlikely that the proposed a 200-foot wide buffer on the White River (see page 1-16) will be sufficient considering the proposed Floodplain Mitigation Measures described on pages 3-34 and 3-35 needed to avoid aggravating existing flooding. These floodplain excavations will move the Ordinary High Water Mark, which will affect existing areas with trees and potentially reduce the functional riparian buffer to less than 200 feet. The proposal to add trails in these areas (see page 1-6) would further reduce the available functional riparian area, particularly for tree growth and large wood recruitment into the future as trails would be placed within this 200-foot buffer area. 1-24

7. The FSEIS should also discuss why the City is pursuing these action alternatives if there is currently excess employment capacity (see page 2-8). The FSEIS should also explain how Alternative 4, the proposal to convert existing zoned agricultural lands to light industrial is consistent with the City's Comprehensive Plan and the Pierce County County-wide Planning Policies. 1-25

8. Stormwater generated by the future commercial, industrial and housing projects need to treat their stormwater using "enhanced" water quality treatments measures to minimize impacts to salmon and to avoid further water quality degradation in the White River and Stewart Creek. 1-26

9. The City should get a jurisdictional determination from the U.S. Army Corps of Engineers to verify the statements regarding jurisdictional wetlands and waterbodies in the SDEIS and Appendix H which could affect the impacts analysis and mitigation section of the Plants and Animals portion of the SDEIS. 1-27

10. Section 3.4 regarding Plants and Animals fails to consider potential impacts to salmon and their habitats as a result of additional floodplain fill, reduced buffers (see comments 2 and 6 above), and potential stormwater impacts from both increases in stormwater discharges (raising water velocities and adversely affecting juvenile salmon), and potential decreases in water quality. 1-28

11. Section 3.4 regarding Plants and Animals fails to consider potential impacts to salmon and their habitats as a result of additional floodplain fill, reduced buffers (see comments 2 and 6 above), and potential stormwater impacts from both increases in stormwater discharges (raising water velocities and adversely affecting juvenile salmon), and potential decreases in water quality. 1-29

Attachment

The June 16, 2014 Mukleshoot Indian Tribe Letter included a full copy of the following document:

- Channel-Conveyance Capacity, Channel Change, and Sediment Transport in the Lower Puyallup, White, and Carbon Rivers, Western Washington, By Jonathan A. Czuba, Christiana R. Czuba, Christopher S. Magirl, and Frank D. Voss

The document is available at the following link: <http://pubs.usgs.gov/sir/2010/5240/>. A summary abstract is located on the following pages. A full copy of the study is also available at the City of Sumner City Hall.



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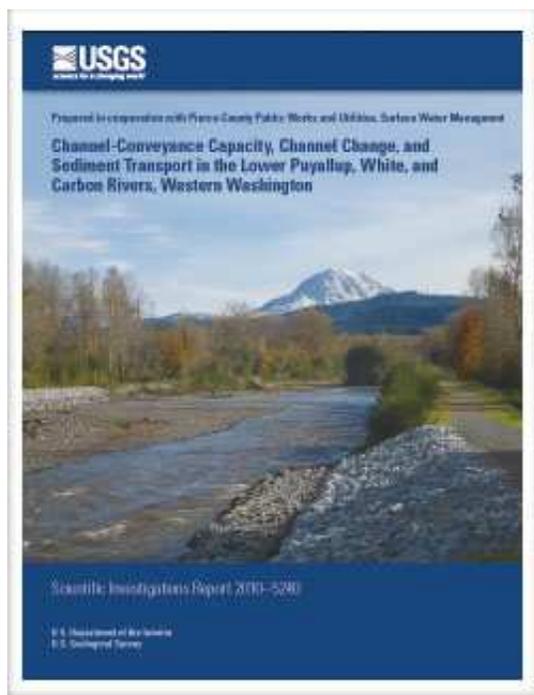
Scientific Investigations Report 2010-5240

>> [Pubs Warehouse](#) > [SIR 2010-5240](#)

Prepared in cooperation with Pierce County Public Works and Utilities, Surface Water Management

Channel-Conveyance Capacity, Channel Change, and Sediment Transport in the Lower Puyallup, White, and Carbon Rivers, Western Washington

By Jonathan A. Czuba, Christiana R. Czuba, Christopher S. Magirl, and Frank D. Voss



Abstract

Draining the volcanic, glaciated terrain of Mount Rainier, Washington, the Puyallup, White, and Carbon Rivers convey copious volumes of water and sediment down to Commencement Bay in Puget Sound. Recent flooding in the lowland river system has renewed interest in understanding sediment transport and its effects on flow conveyance throughout the lower drainage basin. Bathymetric and topographic data for 156 cross sections

First posted December 1, 2010

- [Report PDF \(14.5 MB\)](#)
- Data Files
 - [2009 USGS BedMaterialGrainSizeDistributions.csv \(16 KB\)](#)
 - [2009 USGS CrossSections.csv \(826 KB\)](#)
 - [2010 USGS Additional Sumner CrossSections.csv \(13 KB\)](#)

For additional information contact:

Director, Washington Water Science Center
U.S. Geological Survey
934 Broadway - Suite 300
Tacoma, Washington 98402
<http://wa.water.usgs.gov>

Part or all of this report is presented in Portable Document Format (PDF); the latest version of Adobe Reader or similar software is required to view it. [Download the latest version of Adobe Reader, free of charge.](#)

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were surveyed in the lower Puyallup River system by the U.S. Geological Survey (USGS) and were compared with similar datasets collected in 1984. Regions of significant aggradation were measured along the Puyallup and White Rivers. Between 1984 and 2009, aggradation totals as measured by changes in average channel elevation were as much as 7.5, 6.5, and 2 feet on the Puyallup, White, and Carbon Rivers, respectively. These aggrading river sections correlated with decreasing slopes in riverbeds where the rivers exit relatively confined sections in the upper drainage and enter the relatively unconstricted valleys of the low-gradient Puget Lowland. Measured grain-size distributions from each riverbed showed a progressive fining downstream.

Analysis of stage-discharge relations at streamflow-gaging stations along rivers draining Mount Rainier demonstrated the dynamic nature of channel morphology on river courses influenced by glaciated, volcanic terrain. The greatest rates of aggradation since the 1980s were in the Nisqually River near National (5.0 inches per year) and the White River near Auburn (1.8 inches per year). Less pronounced aggradation was measured on the Puyallup River and the White River just downstream of Mud Mountain Dam. The largest measured rate of incision was measured in the Cowlitz River at Packwood (5.0 inches per year).

Channel-conveyance capacity estimated using a one-dimensional hydraulic model decreased in some river reaches since 1984. The reach exhibiting the largest decrease (about 20–50 percent) in channel-conveyance capacity was the White River between R Street Bridge and the Lake Tapps return, a reach affected by recent flooding. Conveyance capacity also decreased in sections of the Puyallup River. Conveyance capacity was mostly unchanged along other study reaches. Bedload transport was simulated throughout the entire river network and consistent with other observations and analyses, the hydraulic model showed

that the upper Puyallup and White Rivers tended to accumulate sediment. Accuracy of the bedload-transport modeling, however, was limited due to a scarcity of sediment-transport data sets from the Puyallup system, mantling of sand over cobbles in the lower Puyallup and White Rivers, and overall uncertainty in modeling sediment transport in gravel-bedded rivers. Consequently, the output results from the model were treated as more qualitative in value, useful in comparing geomorphic trends within different river reaches, but not accurate in producing precise predictions of mass of sediment moved or deposited.

The hydraulic model and the bedload-transport component were useful for analyzing proposed river-management options, if surveyed cross sections adequately represented the river-management site and proposed management options. The hydraulic model showed that setback levees would provide greater flood protection than gravel-bar scalping after the initial project construction and for some time thereafter, although the model was not accurate enough to quantify the length of time of the flood protection. The greatest hydraulic benefit from setback levees would be a substantial increase in the effective channel-conveyance area. By widening the distance between levees, the new floodplain would accommodate larger increases in discharge with relatively small incremental increases in stage. Model simulation results indicate that the hydraulic benefit from a setback levee also would be long-lived and would effectively compensate for increased deposition within the setback reach from increased channel-conveyance capacity. In contrast, the benefit from gravel-bar scalping would be limited by the volume of material that could be removed and the underlying hydraulics in the river section that would be mostly unaffected by scalping.

Finally, the study formulated an explanation of the flooding that affected Pacific, Washington, in January 2009. Reduction in channel-conveyance

capacity of about 25 percent at the White River near Auburn streamflow-gaging station between November 2008 and January 2009 was caused by rapid accumulation of coarse-grained sediment just downstream of the gage, continuing an ongoing trend of aggradation that has been documented repeatedly.

Suggested citation:

Czuba, J.A., Czuba, C.R., Magirl, C.S., and Voss, F.D., 2010, Channel-conveyance capacity, channel change, and sediment transport in the lower Puyallup, White, and Carbon Rivers, western Washington: U.S. Geological Survey Scientific Investigations Report 2010-5240, 104 p.

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June 16, 2014

Ryan Windish, Planning Manager
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390

RE: Comments on the Draft Supplemental Environmental Impact Statement (SEIS)
for the Sumner Meadows Golf Course

Dear Mr. Windish

The purpose of this letter is to provide the City of Sumner with comments on the Draft SEIS for the Sumner Meadows Golf Course. Our comments are focused on issues involving flood hazards and capital flood protection projects.

The Draft SEIS includes several proposed Alternatives including the No Action Alternative, which assumes that the King County Countyline Levee Setback Project (“Countyline Project”) has been constructed. To assess impacts, Section 3.3 contains further assumptions and includes discussion of one-dimensional (1D) hydraulic modeling results which are used in the Draft SEIS to determine potential impacts of the alternatives. In our review of the Draft SEIS, we found several statements regarding the Countyline Project that we believe are not correct, and so in the interests of accuracy we have provided needed clarifications or qualifications in the paragraphs below.

At the request of the City of Sumner, King County reviewed the draft HEC-RAS 1D hydraulic model of the Lower White River and its results, as provided to the County on March 18, 2014. Our findings (see attached) were provided to the City by way of letter dated April 15, 2014, (“KC findings”) and demonstrated the significant shortcomings of the 1D modeling of the lower White River. Use of the model did not correctly estimate the complex flow patterns, and we specifically addressed how the model results overestimate and inaccurately portray flood level increases. We note again here that the 1D hydraulic model cannot reliably predict Countyline Project effects, and we believe that the deficiencies that we identified in the KC findings continue to be replicated in the Draft SEIS.

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As often discussed with City representatives, the Countyline Levee Setback Project is a significant public safety project that will provide extensive flood and channel migration protection to numerous existing and future land uses within the City of Sumner. The project

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design has been developed with very thorough and detailed analyses, including two-dimensional (2D) hydraulic modeling and sediment transport analyses to ensure the flood protection performance of the new levee over time. These analyses and results were provided to the City on May 15, 2014, in full detail as part of the permit applications for the Countyline Project and demonstrate that the proposed levee project is fully compliant with the City's current codes. Also, our floodplain analyses, if remodeled to include the city-allowed floodplain fills now being placed, would show even less impact as related to the Countyline Project effects. King County's hydraulic model results show that these current and ongoing floodplain fills are increasing downstream flood levels, in some areas by more than one foot.

2-2

The Countyline Project's flood protection benefits include preventing the overtopping of flood waters and erosion from a river channel avulsion (rapid shift in the river alignment) through Stewart Road, which the Draft SEIS identifies as a principal arterial heavily used for trucking, residential commuting, and emergency services. The Draft SEIS fails to address the ongoing sediment deposition and the ever-increasing risks to existing residential uses and planned development as a result of sediment deposition in the vicinity of the Stewart Road bridge. As we have previously informed the city, the risk of a river channel avulsion along 142nd Avenue East is highly likely due to the loss of one-half of the channel conveyance to sediment deposition over the past twenty-five years. Further delay of the implementation of the Countyline Project increases the probability that an avulsion will occur and result in significant damages to existing development and the recently improved Stewart Road corridor. Damage to Stewart Road would disrupt local freight and commuter traffic for months until the White River could be diverted back under the bridge (if at all possible) and the road reconstructed. These outcomes related to sediment deposition should be considered for each of the project alternatives proposed in the Draft SEIS.

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Use of the 1D model results inaccurately estimates the impacts of the Countyline Project. The inclusion of the Countyline Project within the No Action Alternative and the subsequent suggested mitigations (i.e., Mitigation measures G and H) for the No Action Alternative is inconsistent with SEPA procedures and policies (SMC 16.04 and, by reference, WAC 197-11-660), which should align proposed actions with appropriate mitigations. Because the Countyline Project has not yet been permitted or constructed, it should not be included in the No Action Alternative. Rather, the permitted and existing developments in the City of Sumner should be assessed for their impact on downstream flood elevations and appropriate mitigation measures should be assigned.

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King County has endeavored to collaborate with the City to provide information, review City materials, and coordinate with both the City and the US Army Corps of Engineers flood patrols in preparation for upcoming flood emergencies. We wish to continue to work together with the City and other jurisdictions on these flood protection measures and to implement the Countyline Project so that the benefits to the City residents and business enterprises can be realized as soon as possible.

2-7

We respectfully request that the Draft SEIS be revised to correct information that is technically and procedurally incorrect. As a neighboring jurisdiction and an adjacent landowner to the

2-8

Ryan Windish
June 16, 2014
Page 3

lands included in the proposed alternatives, we were disappointed that we did not receive individual notice of the release of the Draft SEIS. Please add our agency, the Water and Land Resources Division of the King County Department of Natural Resources and Parks, c/o Jeanne Stypula, at the address indicated on the letterhead and by email at Jeanne.Stypula@kingcounty.gov, to all further notices related to this Draft SEIS and its revisions.

2-9

We look forward to meeting with you and other City staff on June 24, 2014, to discuss these issues and to continue our coordination on the Countyline Project. Should you wish to contact me by phone, I can be reached at 206-477-4833.

Sincerely,

Jeanne Stypula, S Engineer
River and Floodplain Management Section

Enclosure

The Honorable Mayor Enslow, City of Sumner
Brett Vinson, City Attorney, City of Sumner
Eric Mendenhall, Associate Planner, City of Sumner
Mark Hoppen, Executive Director, King County Flood Control District
Harold Smelt, Manager, Pierce County Surface Water Management
Steve Bleifuhs, Manager, King County River and Floodplain Management
Joseph B. Rochelle, Senior Deputy Prosecuting Attorney, King County Prosecuting Attorney's Office

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King County

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April 15, 2014

Mike Dahlem, City Engineer
City of Sumner Public Works Department
1104 Maple Street, Suite 260
Sumner, WA 98390

RE: HEC-RAS Modeling of the Lower White River

Dear Mr. Dahlem:

The purpose of this letter is to provide the City of Sumner with comments on a draft HEC-RAS hydraulic model of the Lower White River. The draft model and draft memorandum dated January 22, 2014, were prepared for the City by WEST Consultants, Inc.

In our March 20 meeting with you, other City staff and your consultant, Ross Widener, several graphics were provided and described that illustrated potential City projects involving channel modifications along the Lower White River. It is our understanding that the City's intent is to develop a one-dimensional HEC-RAS hydraulic model that replicates the estimated water surface elevations (WSELs) as produced from the RiverFLO-2D modeling used for the King County Flood Control District's Countyline Levee Setback Project. The two-dimensional (2D) model utilized for the Countyline Project generated WSEL estimates of existing conditions of the White River and also WSELs with the Countyline Project installed. Our staff had provided the 2D model outputs to the City and your consultants for use in developing the draft HEC-RAS model.

Our staff has reviewed the draft HEC-RAS model and memorandum provided to us on March 18, 2014. We have several suggestions to offer as revisions that would be necessary to improve this one-dimensional HEC-RAS model setup to more accurately represent the existing conditions of the Lower White River. Although these suggested revisions would improve the 1D model's representation of the WSELs predicted by the 2D Countyline model, the river channel and floodplain downstream of Stewart Road have even more complex flow patterns than the upstream portion of the White River. Multi-directional flow paths are very difficult to accurately represent in a 1D model.

Our specific comments are attached. First, there are suggested adjustments involving revisions to better match the 1D model to the 2D model and simulate the complex, multiple flow patterns of the existing river and floodplain. Secondly, we offer comparative comments of the two models

Mike Dahlem
April 15, 2014
Page 2

with regard to existing conditions and conditions with the Countyline Project in place. Lastly, we have provided several figures to help illustrate the differences between the modeling results.

The draft memorandum states that it is to present a hydraulics assessment for the Lower White River and specifically includes discussion of "the expected impacts associated with the Countyline Levee Setback project to the Lower White River in the City of Sumner." Since the flow patterns in this stretch of the White River are very complex, we believe that using a 2D model is the appropriate tool to apply in order to accurately and reliably model these complex flow patterns. As such, the RiverFLO-2D model has been applied to the Countyline Project for design development and has been utilized to assess the potential effects of the Project. Also, the 2D model was based upon calibration data, resulting in output results that provide the best prediction of 100-year WSELs under existing (i.e., 2011) and for the post-project conditions. These outputs were utilized to conduct the assessment of project effects through the completed SEPA process. The application of the 2D modeling domain that extends downstream of 8th Street Bridge predicts the project effects, which meet the City's floodplain development requirements.

We understand the City's desire to examine and plan for the City's future projects such as the 8th Street Bridge replacement and downstream channel modifications. We encourage you and your consultants to make revisions to the HEC-RAS model setup so that it replicates the more reliable output results of the 2D model. In this way, a revised HEC-RAS model could then be used to assess the City's potential projects with a higher degree of confidence in the computed results.

We would be pleased to meet with you and your consultants again to discuss our comments and assist the City in its efforts to move forward with its assessment of the City's channel modification and bridge projects. I can be contacted by phone at 206-477-4833 or by email at jeanne.stypula@kingcounty.gov.

Thank you for the opportunity to review and comment on the draft HEC-RAS model and the memorandum.

Jeanne Stypula, Supervising Engineer
River and Floodplain Management Section

Enclosures

cc Brett Vinson, City Attorney, City of Sumner
Eric Mendenhall, Associate Planner, City of Sumner
Ross Widener, Project Manager, Widener & Associates
Steve Bleifuhs, Manager, River and Floodplain Management Section (RFMS), Water and Land Resources Division (WLR)
Chris Brummer, Senior Engineer, RFMS, WLR
Joseph B. Rochelle, Senior Deputy Prosecuting Attorney, King County Prosecuting Attorney's Office

Attachment A

King County River and Floodplain Management Section Comments on the City of Sumner HEC-RAS Model and West Consultants 1/22/2014 Memorandum

Model Descriptions

The City of Sumner retained WEST Consultants Inc. to develop a one-dimensional (1D) HEC-RAS hydraulic model for the lower White River (1D model or WEST 1D model). The model extends from the A Street Bridge in Auburn at river mile (RM) 6.33 to the confluence of the White River with the Puyallup River in the City of Sumner (RM 0.0). This 1D model includes two scenarios: an “existing” condition and a “with-levee” condition meant to simulate conditions with the Countyline levee setback project in place. The “existing” conditions model was derived from a preliminary HEC-RAS model developed (but not completed) by FEMA’s STARR team. This model was presumably based on 2012 lidar (King County provided these data to FEMA for the STARR model) and did not extend upstream of Stewart Road. WEST Consultants extended the model upstream to the A Street Bridge. The WEST 1D model also included permitted (future) floodplain fill for a portion of the Greenwater North (GWN) development north of Stewart Road. To simulate “with-levee” conditions, WEST Consultants added the setback levee to the 1D “existing” conditions model but did not remove the existing Countyline levee. The removal of the existing top of bank levee is a major flood-risk reduction component of the County’s levee setback project.

In 2013, King County completed a two-dimensional (2D) hydraulic model of the Lower White River using RiverFLO-2D (County 2D model or 2D model). This 2D model extends from RM 6.7 (upstream of the A Street Bridge) to RM 2.5 in the City of Sumner. The County’s 2D model of “existing” conditions is based on the 2011 in-channel (bathymetric) survey and the 2011 lidar floodplain topography, which does not capture all of the new floodplain fill appearing in the 2012 lidar. Additionally, the County’s 2D model does not include the permitted (future) fill in the GWN property that is in the WEST 1D model. To simulate conditions with the Countyline levee setback project in place, the County’s 2D model included the proposed setback levee, engineered logjams, log biorevetment, and the proposed removal of the existing Countyline levee; this removal is not included in the 1D model. The consequences of these differences between the 1D and 2D models are discussed below in the context of all of the other assumptions that were made for the model setups.

Model Setup

The WEST 1D model uses some of the advanced tools available in the HEC-RAS computer program to set up and run the model, but the model does not accurately represent many of the physical elements present within the floodplain. For example, the 1D model does not include

separate flow paths or “reaches” in areas where field observations of past flooding patterns, floodplain topography, and the County’s 2D model indicate they are hydraulically disconnected from the river channel downstream of where the flow splits from the main channel of the river. Examples include the left bank wetland behind the existing Countyline levee, Pacific City Park behind the concrete revetment, Butte Avenue south of Government Canal, the left bank south of Stewart Road, the left bank within the golf course, and in the vicinity of warehouses on the right bank south of 16th Street. Because HEC-RAS uses 1D cross-sections to simulate flow over a 2D floodplain surface, setting up the model requires *a priori* assumptions of cross-section orientation, floodplain connectivity, locations of flow convergence and divergence, and how much flow is allowed to exchange at these locations. Setting up a 1D model in this complex environment requires extensive calibration using high water marks surveyed throughout the model domain. Although high water marks from the January 2009 flood event are well documented, they cannot be directly used for calibration of a 2010 model because an additional foot of sediment has filled the channel within the Countyline reach, and additional floodplain fill has been placed in the left overbank for development. Because a 2D model program coding is meant to simulate complex flow patterns, it is for these reasons that a 2D model was utilized by King County.

The County’s 2D model simulates the flow of water over a 2D surface of the channel and floodplain topography and simultaneously solves for the water surface elevation and velocity at hundreds of thousands of points. Attachment B shows the velocity vectors (both the direction and the magnitude or speed of the depth-averaged flow) for the 100-year event under existing conditions as simulated by the County’s 2D model and illustrates the complex splitting and converging flow patterns throughout the floodplain. A 2D model is better suited for the evaluation of these complex flow patterns around flow obstructions (i.e., levees, roads, buildings, and artificial fill pads) and the exchange of flow between the river and floodplain (and from the floodplain back to the river) across the wide and commercially developed floodplain of the lower White River. In a 2D model, complex flow patterns are produced as a result of the simulation (allowing the topography to dictate flow paths) rather than being imposed beforehand by how the cross-sections, lateral structures, and reach connections are defined, as with the 1D model.

Comparison of Model Results

The following sections describe some of the major differences between the results of the WEST 1D model and the results of the 2D model used by the County based on a preliminary analysis of the HEC-RAS model provided by the City. The following comments refer to specific areas identified by river mile in Attachments B through F. This summary does not represent a complete list of model differences. A more detailed analysis might disclose additional differences between the results of the two models.

“Existing” Conditions

Left bank wetland, RM 6.2 – 5.2: The County’s 2D model is able to simulate observed flow conditions in the left bank wetland and shows that flow here is hydraulically disconnected from flow in the main stem river after the flow separates from the river channel (Attachments B and C). The 1D model ignores the hydraulic influence of the existing Countyline levee on the left bank and assumes the same water surface elevation in the channel and in the wetland through this area (Attachment D), which results in maximum water surface elevations in the 1D model that are both higher and lower than elevations shown by the 2D model (Attachment E). Because of the way the 1D model splits flow at the south end of the wetland, two of the cross-sections in the 1D model indicate dry conditions in this area (Attachment D, east of RM 5.3). The 1D model should include a lateral structure along the left bank levee and a separate reach through the wetland to represent overtopping of the existing Countyline levee and the hydraulically disconnected flow through the wetland. The water surface contours generated from the 2D model results can be used to determine the orientation of the 1D cross-sections and locations for additional model reaches.

: The 2D model shows a split flow rate of 5,090 cfs leaving the south end of the wetland and passing through the left bank floodplain and over Stewart Road. Although the permitted (future) fill in the WEST 1D model blocks most of this flow path, their 1D model results show a slightly higher split flow rate of 5,300 cfs passing over Stewart Road. Despite showing more split flow and, therefore, less flow going under the 8th Street Bridge, the 1D model shows lower (rather than higher) water surface elevations at several locations upstream of the bridge than does the County’s 2D model (Attachment E, RM 5.1). King County suggests that a 1D model be developed that uses the same topography as the County’s 2D model so that it can be calibrated before adding proposed floodplain features such as permitted fill.

: The 2D model shows flow splitting from the river on the right bank near Government Canal and flowing south between Butte Avenue and the Union Pacific Railroad embankment (Attachments B and C). After leaving the river, flow entering this area is hydraulically disconnected from the river by mounds of dredge spoils east of Butte Avenue. This high ground, the Union Pacific Railroad berm to the west, and the 8th Street prism to the south cause floodwaters to pond in this area until they rise high enough to spill through a gap in the dredge spoils north of 8th Street (near RM 5.05) and drain east to the river. During the 2009 flood (and in the 2D model results as shown in Attachment C), the water surface elevation north of 8th Street was about two feet higher than the water surface elevation in the river. The 1D model, which shows water surface

elevations that are one to two feet too low (Attachment E), should be revised to include a split flow path at Government Canal that feeds back to the river at a cross-section located upstream of 8th Street near RM 5.0.

- 3.9: Results of the County's 2D model indicate this area receives water from both the river and from the split flow passing over Stewart Road and around the fill placed in the Greenwater South property, with water eventually flowing through this developed area to the southeast (Attachment C), with an average depth of about one foot. The 1D model includes a lateral weir on the left bank and a separate flow path to the east that only receives water from the river. Consequently, inundation is only shown in the stormwater channel south of 142nd Avenue (Attachment D) and not across the floodplain as indicated by the 2D model. The water surface elevations in the 1D model are as much as five feet lower than indicated in the 2D model (Attachment E). The 1D model should include flow paths from both the river and from the split flow passing over Stewart Road. The cross-sections in the 1D model should be oriented perpendicular to the flow vectors in the 2D model, and not east-west as they are in the current 1D model.

Right bank below 16th Avenue, RM 4.2 – 3.3: The County's 2D existing conditions model shows inundation depths of about one foot around the warehouses on the right bank (and deeper in the recessed loading docks). Water surface elevations around the warehouses are up to two feet higher than the water surface elevations in the adjacent river channel to the east (Attachment C) because flow becomes trapped behind the warehouses and hydraulically disconnected from the flow in the river. The 2D model indicates flooding on the right bank occurs from overbank flow leaving the large river meander to the north (Attachment B). In contrast, the 1D model shows water surface elevations in the river channel that are 1.5 to 2.0 feet lower than the elevations in the 2D model (Attachment E). Consequently, the 1D model does not indicate any inundation between the warehouses. The 1D model should include a flow path originating from the meander bend near RM 4.5 that passes through the warehouses on the right bank. The water surface contours generated from the County's 2D model can be used to orient the 1D cross-sections.

Right bank below 24th Avenue, RM 3.4 – 2.5: The County's 2D model shows complex (but shallow) flow patterns around the existing warehouses (Attachments B and C). This flow trends to the south-southwest away from the river. The 1D model results (Attachment D) shows a constant water surface elevation that is along the entirety of a single cross-section extending from the Union Pacific Railroad at 24th Street, southeast to the left bank floodplain at the BNSF Railway (east of RM 2.5). Consequently, the 1D model results show water surface elevations that are as much as one foot higher and as much as five feet lower than the elevations in the 2D model (Attachment E). The 1D model should include a flow path from the meander bend between RM 3.2 and 3.5 that passes through the right bank floodplain. The water surface contours generated from the County's 2D model can be used to orient the 1D cross-sections through this reach.

Conditions with the Countyline Levee Setback Project

Left bank wetland, RM 6.2 – 5.2): To simulate conditions immediately after construction of the Countyline levee setback project, the County’s 2D model accounted for all of the project components, including the proposed setback levee and the proposed removal of the existing Countyline levee. The WEST 1D model of conditions with the Countyline Levee Setback project in place does not account for the removal of the existing levee, which is a significant element of the County’s proposed design because it will substantially lower water surface elevations on the right bank. As a consequence of not removing the existing levee (and not including a separate flow path through the wetland as described above), the 1D model of “with-project” conditions predicts water surface elevations in the left bank wetland that are several feet higher than the 2D model elevations in the north end of the wetland and three feet lower in the south (Attachment F). On the right bank, the 1D model predicts water surface elevations that are both higher and lower than elevations predicted by the 2D model results (Attachment F).

Right bank along Butte Avenue, south of Government Canal, RM 5.4 – 5.0: Similar results are observed in this area in a comparison of the with-project model outputs (Attachment F) as described above for the comparison of the existing conditions model results. This difference is primarily due to the absence of a split flow path in the 1D model, and because the difference between the 1D and 2D models is more pronounced for conditions with the Countyline Levee Setback project in place.

–3.9: Similar results are observed in a comparison of the with-project model outputs (Attachment F) as described above for the comparison of the existing conditions model results. One exception is in the northwest corner of the golf course, where the 1D model indicates water surface elevations are several feet higher than elevations in the 2D model results. This is due to water levels being extended to the edge of the cross-sections in the “Mid OB” reach of the 1D model. Inundation of this area is not a result of water traveling through the left bank of the reach defined by Mid OB; it results from main channel backwater.

Conclusions

Because of the complex hydraulics in the project reach, the County recommends the use of a 2D model to evaluate existing flood hazards and the flood benefits and potential impacts of future projects constructed in the floodplain of the Lower White River.

If a 1D model such as HEC-RAS is to be used, we recommend adding more lateral structures and reaches to the model to simulate the converging and diverging flow paths shown by the flow vectors generated from the 2D model (Attachment B). The HEC-RAS cross-sections should be oriented parallel to the water surface elevation contours generated from the County’s 2D model output to obtain a better match between the 1D and 2D model results. The 1D model should be constructed using the same base maps as the County’s 2D model in order to calibrate it to the 2D

model. This would require that the 1D model use the 2011 topography without permitted (future) fill for the “existing” conditions model run and also consider the removal of the existing Countyline levee for the future “with-project” model run. Permitted (future) fill and floodplain modifications occurring after 2011 could then be added to the 1D model after it is calibrated to the 2D model results.

The 1D model is currently not set up to simulate the complex flow patterns occurring in the study reach and, therefore, produces erroneous water surface elevations that differ by several feet (both above and below) from the elevations in the County’s 2D model. The 1D model, in its current form, should not be used to evaluate existing flood hazards or the flood benefits or the potential impacts of any future projects until the deficiencies noted above are addressed.

List of Figure Attachments

Attachment B: Results of the County’s 2D model of existing (2011) conditions for the 100-year event showing the area of floodplain inundation (blue shading) and flow vectors (velocity direction and relative magnitude). The HEC-RAS cross-sections and reaches for the 1D model are overlain on the 2D model results for comparative purposes. *Note: Detailed viewing of the flow vectors can be achieved by opening the PDF file and increasing the zoom setting to 200% or more.*

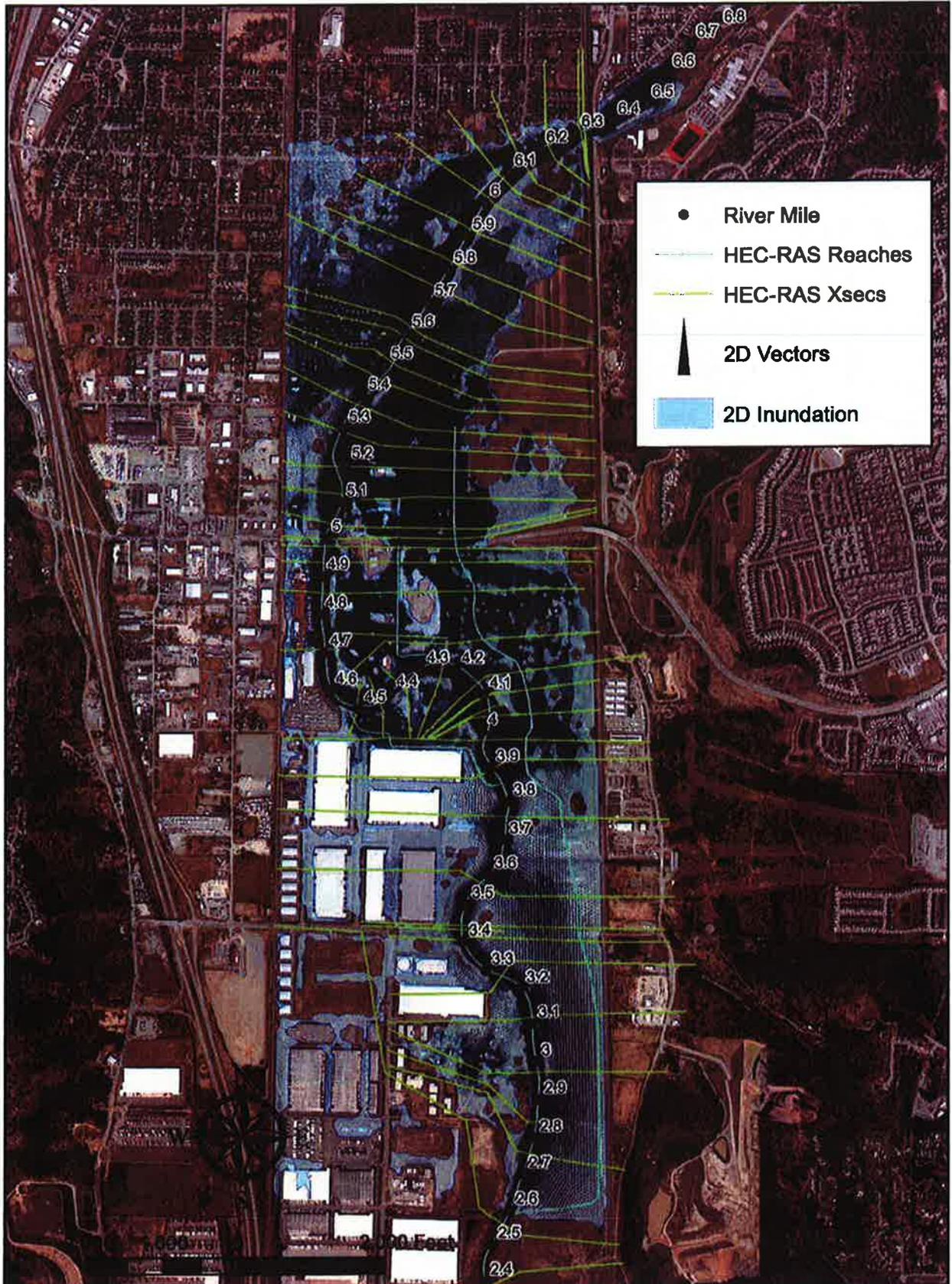
Attachment C: Results of the County’s 2D model of existing (2011) conditions for the 100-year event showing areas of inundation and corresponding water surface elevations (WSELs).

Attachment D: Results of the 1D model of existing conditions (as defined in supporting documentation) for the 100-year event showing areas of inundation and corresponding water surface elevations (WSELs). The area of inundation was generated by King County in HEC-GeoRAS using the program’s default settings and by projecting the water surface elevations at each cross-section over the 2011 lidar surface.

Attachment E: Difference in water surface elevation for the 100-year event between the 1D model results and the 2D model results for existing conditions (as defined for each model). Red colors indicate where the 1D elevations are higher than the 2D elevations. Blue colors indicate where the 1D elevations are lower than the 2D elevations. Green indicates areas that are inundated in the 2D model but appear dry in the 1D model (no difference calculated).

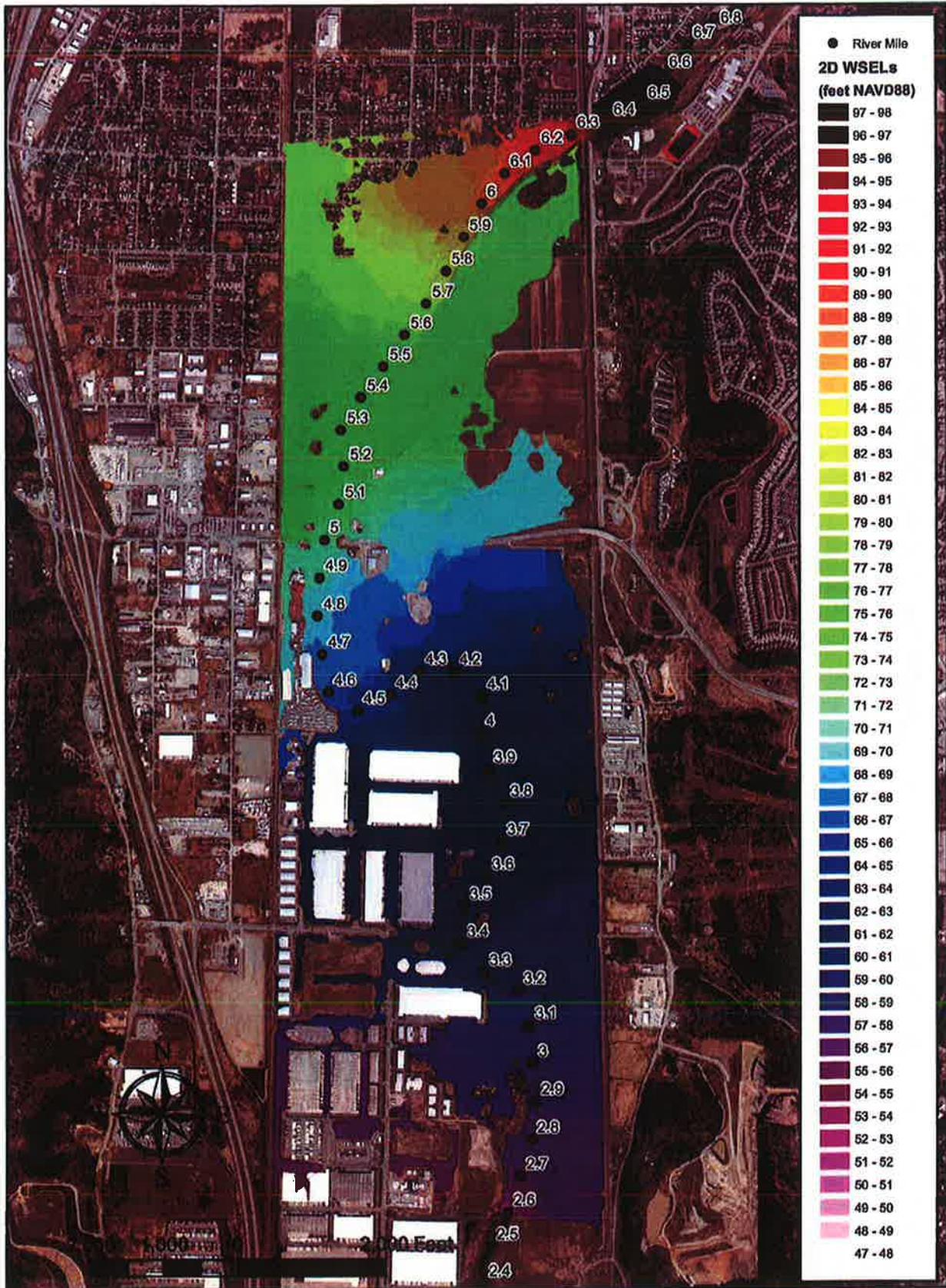
Attachment F: Difference in water surface elevation for the 100-year event between the 1D model results and the 2D model results for conditions immediately after construction of the Countyline Levee Setback project (as defined for each model). Color coding is the same as in Attachment E.

Attachment B



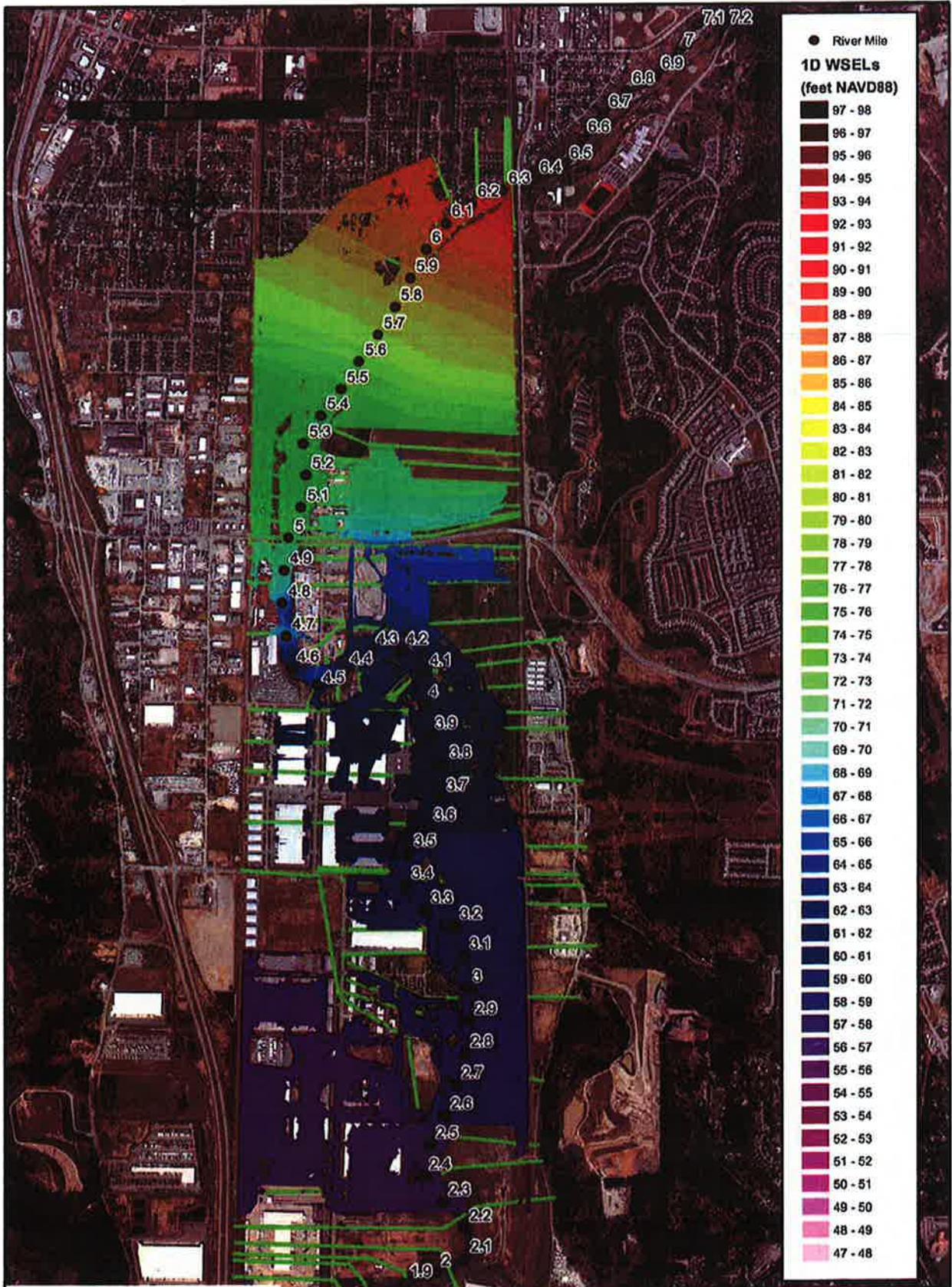
Prepared by King County River and Floodplain Management Section - April 14, 2014
Provisional information subject to change. See Attachment A for explanation.

Attachment C



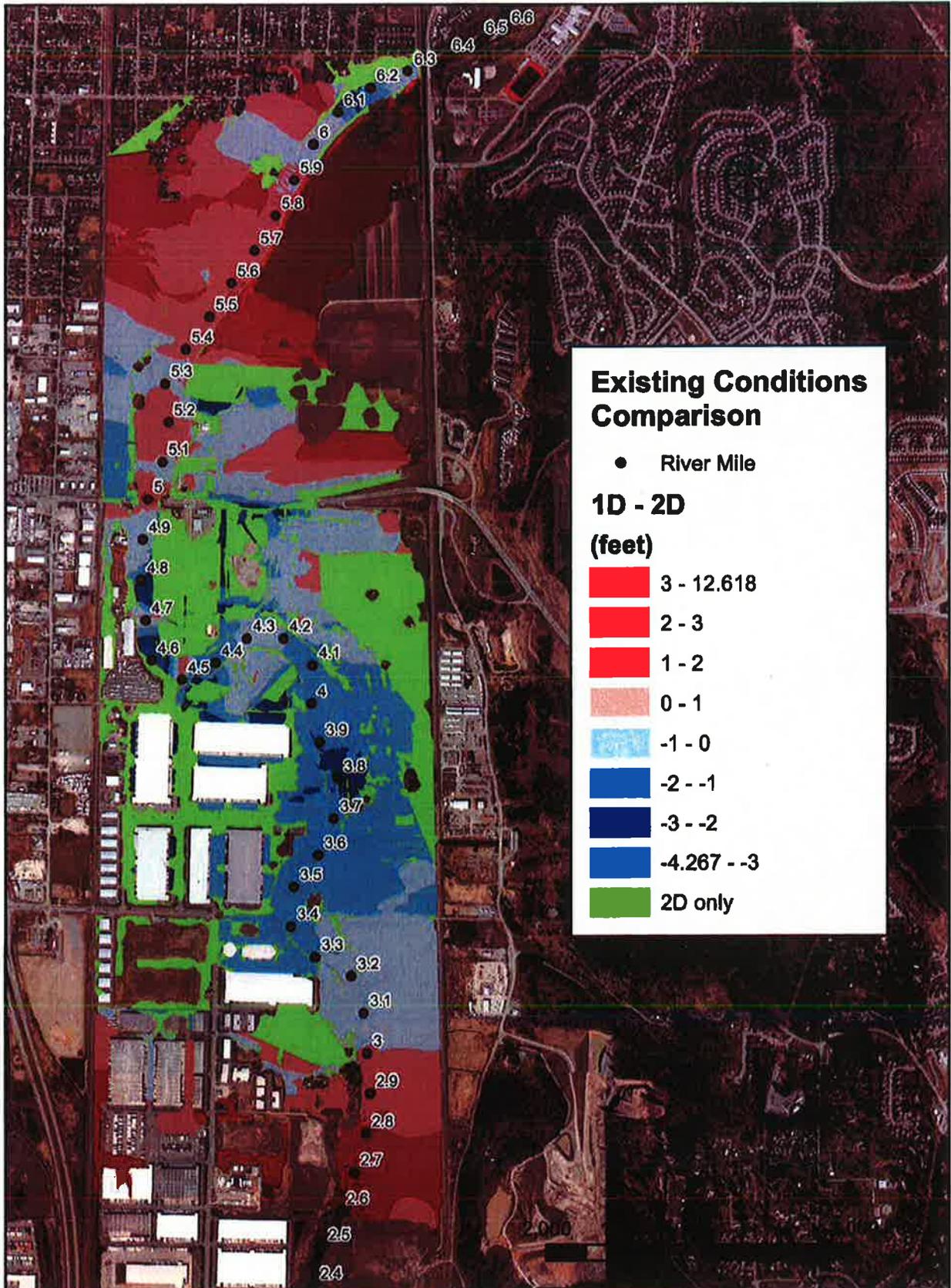
Prepared by King County River and Floodplain Management Section - April 14, 2014.
Provisional information subject to change. See Attachment A for explanation.

Attachment D



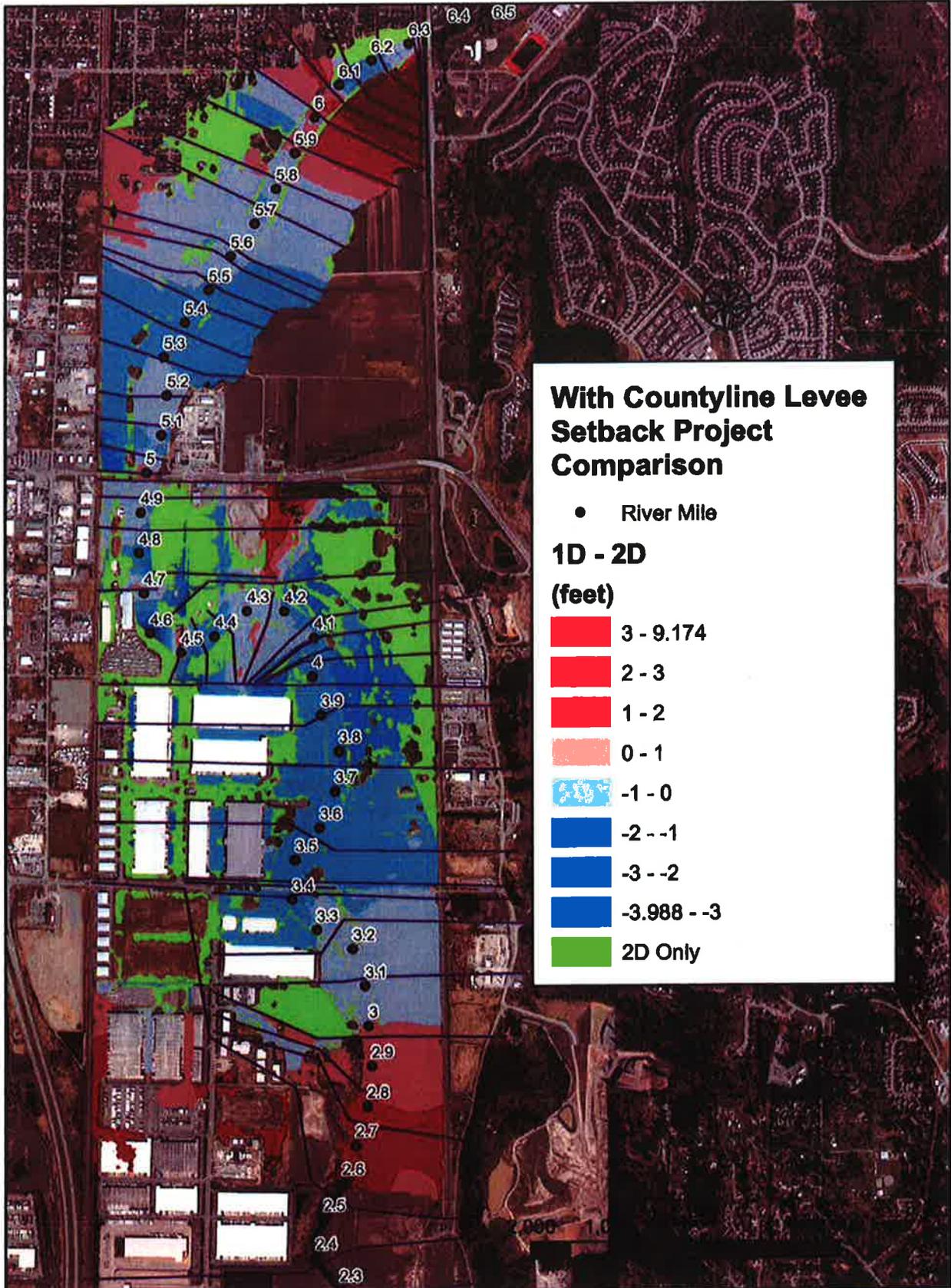
Prepared by King County River and Floodplain Management Section - April 14, 2014
Provisional information subject to change. See Attachment A for explanation.

Attachment E



Prepared by King County River and Floodplain Management Section - April 14, 2014
Provisional information subject to change. See Attachment A for explanation.

Attachment F



Prepared by King County River and Floodplain Management Section - April 14, 2014
 Provisional information subject to change. See Attachment A for explanation.

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

June 16, 2014

Ryan Windish, Planning Manager, AICP
City of Sumner
Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390



Your address
is in the
**Puyallup-
White**
watershed

Dear Mr. Windish:

Thank you for the opportunity to comment on the draft supplemental environmental impact statement (DSEIS) for the City of Sumner 2013 Comprehensive Plan Annual Amendments Sumner Meadows Docket proposal. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

FLOODPLAINS MANAGEMENT: Jeff Stewart (360) 407-6521

The City of Sumner is updating its Shoreline Master Program, and the provisions in the final adopted version will also need to be considered in review of development proposals in the subject area. Based on the information provided in this DSEIS, we note there appears to have been insufficient analysis of any clearly defined development proposals, or what possible impacts those proposed developments could have to future flood zone impacts elsewhere in the basin.

3-1

**SHORELANDS & ENVIRONMENTAL ASSISTANCE:
Alex Callender (360) 407-6167**

We understand that this is a DSEIS. There are different elements that are independent of this Sumner Meadows project that may impact the Sumner Meadows property with regards to flood rise. The County line setback project is a project that has not been done yet and could have a big effect on the viability of this project. If it is not completed, the project site could be impacted by flood events. Pulling back the banks of the White River in shoreline jurisdiction may mitigate for the flood rise, but a Hydraulic Engineering Center-River Analysis System (HEC-RAS) analysis will need to be done to verify that the mitigation will be effective. Likewise the flood channel and bridge flood rise analysis will need to be included for the cumulative impacts analysis.

3-2

3-3

The city will need to buy property for the flood channel. Is this part of the city's comprehensive plan? The city will need to be clear about the timing and effect that all these different independent projects would have on the impact area.

3-4

June 16, 2014

Page 2

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

3-5

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM:14-2490)

cc: Alex Callender, SEA
Jeff Stewart, Flood

Ryan Windish

From: Mike Reynolds <mjr@reynoldsburton.com>
Sent: Tuesday, May 20, 2014 12:11 PM
To: Ryan Windish
Cc: robin@petersenbrothers.com; gary@petersenbrothers.com; Brett Vinson
Subject: Sumner Meadows Golf Course Comprehensive Plan Amendments

Dear Mr. Windish:

On behalf of the Petersens, who own the property directly to the east of Sumner Meadows Golf Course, we are respectfully requesting that this property, currently zoned Multi Family due to the existence of the golf course, be changed to M-1 to be consistent with the adjacent properties. From my understanding the City originally changed the zoning classification of my client's property from M-1 to Multi Family due to the City's placement of the golf course, now if the City is eliminating the golf course, the Multi Family zone would be inappropriate lying between a major thoroughfare, East Valley Highway, and the industrial area.

4-1

If my clients' property remains Multi Family the conversion of the Sumner Meadows Golf Course to Industrial would have a significant environmental affect upon the adjacent Multi Family. Therefore the logical resolution is to rezone my clients' property to the Industrial classification.

4-2

Thank you.

Michael J. Reynolds
Reynolds Burton Attorneys
1219 Cole Street
Enumclaw, WA 98022

Phone: 360-802-3888
Fax: 360-802-3886

June 16, 2014

Mr. Ryan Windish
City of Sumner
1104 Maple Street
Sumner, WA 98390

RE: Public Comment on the Draft Supplemental EIS for Annual Comprehensive Plan Amendments - Support for Alternative #2

Dear Ryan:

This letter provides comment on the Draft Supplemental EIS (SEIS) for the City's Annual Comprehensive Plan Amendments. If the City is to proceed with the land use amendment to the golf course property, it is essential that the land use designations of the other properties along the Stewart Road corridor also be amended to mitigate the consistency, compatibility and viability impacts that the golf course proposal will impose upon neighboring properties. In this light, Tarragon L.L.C. supports the proposed amendments in the form set forth as Alternative 2 in the Draft SEIS.

5-1

As a representative of the owner of property located north and south of Stewart Road and west of the White River (commonly referred to as the Greenwater North and Six Kilns properties, respectively), if the land use designation of the golf course property is to be amended, we recommend Alternative 2 as described in the Draft SEIS. In Alternative 2 the golf course property land use designation would be amended to modify the current Public-Private Facilities and Utilities land use designation to Light Manufacturing. The Six Kilns property's land use designation would be amended from Urban Village to Light Manufacturing and the underlying zoning would change from the current mix of General Commercial, High Density Residential and Light Manufacturing to all Light Manufacturing. Alternative 2 would also amend the General Commercial portion of the Greenwater North property to Light Manufacturing. We support the amendments for Greenwater North and Six Kilns as described in Alternative 2 for the following reasons:

5-2

(1) The Six Kilns property and the golf course property are immediately adjacent to each other. Good planning principles do not locate residential uses adjacent to industrial uses. There are inherent conflicts between the two uses that often result in nuisance complaints. Additionally, locating undesirable uses adjacent to housing impacts the marketability of the housing. Redesignating the Six Kilns property as proposed in Alternative 2 will resolve these inherent conflicts.

5-3

5-4

(2) If the Urban Village/General Commercial designation is removed from the golf course property, we are concerned about our ability to develop and support viable commercial uses on the Greenwater North and Six Kilns properties, as a certain critical mass of commercial land is necessary for market viability. While we question whether the General Commercial uses were ever a viable option in this area, without a cohesive mix of uses in the corridor, the General Commercial zoned/designated

5-5

Mr. Ryan Windish
June 16, 2014
Page 2

properties would likely never be developed. This would negatively impact the City as well as Six Kilns. Therefore, removing the Urban Village/General Commercial designation not only from the golf course property, but also from the Six Kilns property, as proposed in Alternative 2, is in the interest of not only Six Kilns but the City as well.

We concur with the findings of the Draft SEIS that development of the Six Kilns and Greenwater North properties similar to the golf course property would be more compatible than Alternatives 1 and 3. We encourage the City to establish a long-term and consistent land use pattern along Stewart Road. We believe that the City's designation of the golf course property as Light Manufacturing, along with also designating the Greenwater North and Six Kilns properties as Light Manufacturing, will result in maximum utilization of the properties and a much greater land use harmony in the Corridor. Alternative 2 is the only alternative that makes sense for the entirety of the Stewart Road corridor.

5-6

5-7

5-8

Sincerely,



Dennis L. Rattie
Tarragon L.L.C.
President

Appendix B: CITY STAFF REPORT TO THE PLANNING COMMISSION



Memorandum

DATE: July 9, 2014
TO: Planning Commission
FROM: Ryan Windish, Planning Manager
RE: **2013 COMPREHENSIVE PLAN ANNUAL AMENDMENTS**

I. INTRODUCTION

State law requires that each city planning under GMA have a procedure for interested persons to suggest amendments to its comprehensive plan or development regulations. The City of Sumner adopted a process for accepting and reviewing proposed amendments which is codified at SMC 18.56.147.

The State Environmental Policy Act (SEPA) analysis of the proposed amendments and various alternatives is contained in the *City of Sumner 2013 Comprehensive Plan Annual Amendments-Sumner Meadows Docket-Draft Supplemental Environmental Impact Statement, May 2014* (DSEIS) that was issued on May 15, 2014 following a Determination of Significance (DS) and scoping process.

II. POLICY ANALYSIS

Only those amendments which are found to be in substantial compliance with all criteria listed below shall be approved (SMC 18.56.147(N)):

1. An amendment is necessary to resolve inconsistencies between the Sumner comprehensive plan and other city plans or ordinances; or, to resolve inconsistencies between the Sumner comprehensive plan and other jurisdictions' plans or ordinances;
2. Conditions have so changed since the adoption of the Sumner comprehensive plan that the existing goals, policies, objectives, and/or map classifications are inappropriate.
3. The proposed amendment is consistent with the overall intent of the goals of the Sumner comprehensive plan.

4. The proposed amendment is consistent with chapter 36.70A RCW (Growth Management Act), the countywide planning policies (CPP) for Pierce County, and the applicable Multi-county planning policies (VISION 2040).
5. Where an amendment to the comprehensive plan map is proposed, the proposed designation is adjacent to property having a similar and compatible designation, or the subject property is of sufficient size, or other conditions are present.
6. Environmental impacts have been disclosed, and measures have been included to reduce possible adverse impacts.
7. Potential ramifications of the proposed amendment to other comprehensive plan elements and supporting plans have been considered and satisfactorily addressed.

Criteria 4 refer to policies in the GMA, Countywide Planning Policies, and VISION 2040. These amendments are incorporated into the Proposed Action Alternatives and discussed under Chapter 3, Section 3.6 “Relationship to Plans and Policies” in the DSEIS.

Action Alternatives 1 through 4 are being analyzed by the City of Sumner to amend the Comprehensive Plan Map and Zoning Map and text amendments. All of these alternatives are also analyzed in the DSEIS and are discussed here in detail as it relates to the seven criteria above. The DSEIS also contains an analysis of the No Action Alternative for comparison.

A. Why the Amendments are Being Proposed

The City of Sumner is considering map and text amendments to the 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. In addition, scoping comments for the DSEIS that were received requested that Alternatives 2 and 3 be considered as well and are analyzed in the DSEIS and this staff report.

B. Description

Proposal and Alternatives

The proposed docket amendments are described as follows:

Alternative I Sumner Meadows Docket Application:

MA-I: 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-I: Amend the Land Use Element, Public Private Facilities and Utilities (PPUF) description: Amend the Land Use Element, PPUF 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 I (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-I 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 (GC), Urban Village (UV), and Public-Private Utilities and Facilities (PPUF). Implementing zoning would be Light Industrial (M-1). Other text amendments TA-I and TA-2 would be implemented similar to Alternative I. 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 (UV) 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 PPUF 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, GC, UV, and PPUF 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.

III. COMPREHENSIVE PLAN AMENDMENT CRITERIA ANALYSIS

Only those amendments which are found to be in substantial compliance with all criteria listed below shall be approved (SMC 18.56.147(N)):

- I. An amendment is necessary to resolve inconsistencies between the Sumner comprehensive plan and other city plans or ordinances; or, to resolve inconsistencies between the Sumner comprehensive plan and other jurisdictions' plans or ordinances;**

On October 15, 2012 the City Council approved Resolution No. 1360 surplusing approximately 165 acres of land occupied by the city-owned Sumner Meadows Golf Course. The property is designated a combination of Public and Private Facilities and Utilities (PPUF) and Urban Village (UV) on the City's Comprehensive Plan Map (See No Action Alternative, Exhibit E-1). The plans for the property are to sell to a private party and therefore it would no longer be public land or a part of a private utility or facility and therefore inconsistent with the current Comprehensive Plan Map designation. In addition, the sale and conversion of the property to industrial and manufacturing uses also creates an inconsistency with the UV designation along the northern edge of the property adjacent to Stewart Road (8th Street). The UV designation anticipates in the Comprehensive Plan a combination of commercial, residential and recreational uses in the vicinity, including properties west of the golf course, and a future commuter rail station. The majority of the property is zoned Light Manufacturing (M-I) and uses typically found in the M-I zone would be inconsistent with the intent of the UV zone and a neighborhood center concept made up of commercial and residential uses with commuter rail access.

Action Alternatives 1 through 3 redesignate the property to M-I with variation in how the properties are redesignated to the west of the golf course and north of Stewart Road. Alternative 4 provides an "off-site" alternative if the golf course were to remain as open space to provide a comparison between these alternatives. Alternative 4 retains the existing designations and zones but rezones about 108 acres south of 24th Street that is currently designated PPUF and zoned Agricultural.

2. Conditions have so changed since the adoption of the Sumner comprehensive plan that the existing goals, policies, objectives, and/or map classifications are inappropriate.

The City has surplusd the Sumner Meadows Golf Course property creating a change in circumstances that necessitates the redesignation of the property to M-I, a use compatible with the surrounding zoning and uses. In addition, there is a need for Text Amendments to goals, policies and other text related to the "golf course" and open space in the Comprehensive Plan and for clarity of the description of the PPUF designation.

The following are areas of the Comprehensive Plan that need to be amended:

TA-I: 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).

3. The proposed amendment is consistent with the overall intent of the goals of the Sumner comprehensive plan.

Land Use: Alternatives 1 through 4 are consistent with the overall intent of the goals of the Land Use Element of the Comprehensive Plan and balance "...residential, commercial, industrial, and public land uses." (Policy 1.3, Land Use Sub-element). The amendments redesignate and rezone areas that provide for "orderly development within the Sumner Community" and "Ensure appropriate transitions so that more intensive uses do not adversely impact adjacent uses" by providing adequate setbacks and buffering between industrial and residential uses (Goal 1 and Policy 1.1, Land Use Sub-element). The redesignation/rezone of the golf course and surrounding areas under Alternatives 2 and 3 encourage "infill development on vacant properties with existing public services and public utilities" and developing in "areas with existing or planned public facilities" given the availability of water and sewer in the vicinity and the plan for an extension of 24th Street over the White (Stuck) River (Policy 1.2, Land Use-Sub-element). Furthermore, the redesignation/rezone of the golf course promotes the "creation of 20,000 jobs in the Sumner-Pacific Manufacturing/Industrial Center by 2040" (Policy 1.14, Land Use Sub-element).

Economic Development: All Alternatives are consistent with the overall intent of the Economic Development Element and would create additional industrially zoned land positioned for regional industrial type uses that would benefit the City of Sumner and surrounding areas. Additional industrial land would create opportunity for warehousing, distribution, and manufacturing employment in the Sumner area. The amendment also supports economic development by seeking and maintaining "a strong diverse economy with a variety of different types and sizes of business, industry, and employment" (Goal 1, Economic Sub-element) and providing "adequate land for different kinds of businesses and development" (Policy 1.1, Economic Development Sub-element). The expansion of M-1, Light Manufacturing/Industrial would further the policy of developing "clean" industries that "do not degrade the natural and built environment" (Policy 1.7, Economic Development Element). Policy 2.1 references the need for "protection of natural amenities such as riparian corridors and vital open spaces for the enjoyment by workers and to enhance work and business environment." The golf course is an open space and recreational amenity in the industrial area and would be changed with this amendment. However, there is still a significant amount of open space in the area including the river corridors (totally 400 feet in

width in this area of the city); retention of 108 acres south of 24th Street as Agriculture; retention of a regional trail system; and Riverbend Park at the end of 16th Street. All these remain for workers and business to enjoy.

Community Character: Alternatives 1 through 3 would meet the overall goals and policies in the Community Character Element and retain and promote the pedestrian oriented mixed use type development envisioned in the Comprehensive Plan. The amendment would promote development that would “Maintain and enrich Sumner’s quality of life encompassed in its friendly, small town atmosphere” (Goal 1, Community Character Element) and “maintain a complete community and compatible in character and design, containing housing, shops, work places...essential to the daily life of residents.” (Policy 1.2, Community Character)

Alternative 2 would eliminate the UV overlay and potential for a neighborhood center in the vicinity of the golf course on Stewart Road and thereby continuing to focus activities and business development in the Town Center and downtown consistent with Goal 3 of the Community Character Element that states: “Reinforce the downtown as the town center and commercial and cultural center of Sumner.”

Alternative 1, 3, and 4 would allow for the development of housing within walking distance of industrial areas and promote the ability for people to walk to work (Goal 2, Community Character). Alternative 2 would rezone/re-designate the UV area and GC to the north and HDR and GC zoning to the south of Stewart Road removing the options for residential in close proximity to industry. The industrial area, however, is served by housing in the immediate vicinity to the east (Lakeland Hills) and potentially by commuters using the regional trail system.

Open Space Element: Alternatives 1 through 3 would allow for the development of the golf course (132 acres) and reduce the amount of open space and recreational area within the City. However, the overall goals and policies of the Parks and Open Space Element would be met by retaining natural vegetation and terrain along the river corridor, retaining a regional trail system, and improvements to Riverbend Park. The hillsides to the east would also be protected from development through restrictions on developing steep slopes. Even with the removal of the golf course, the combination of existing parks, open space areas listed above, and land owned by schools and other private and public entities, the City will retain an open space standard of “35% for the entire City” consistent with Policy 2.10.

Furthermore, the agricultural area south of 24th Street (108 acres) would remain open space into the foreseeable future. This remaining open space and parks would meet Goal 1:

“Provide and maintain a safe, attractive, enjoyable, and diverse park system that meets the needs of the City’s residents, businesses and visitors.” (Parks and Open Space Element). And retain a “diversity of park facilities” (Policy 1.3) and includes “facilities for the employees of the industrial...areas” (Policy 1.3.3). The removal of the golf course would “reduce long-term maintenance costs” addressed in Policy 1.1.1.

Alternatives 1 through 3 would continue to “Preserve, protect, and enhance significant open space,” (Goal 2) by retaining the agricultural property south of 24th Street, open space corridors along riparian areas, and Riverbend Park in the industrial area. Alternative 4 would result in the development of lands presently in agricultural use or production, but, overall, would retain and promote open space areas by retaining golf course area. This is consistent with the Parks and Open Space Element, namely: Goal 1, Goal 2, Policies 2.3, 2.4, 2.8, and 2.13.

Environment Element: The Draft SEIS contains analysis of impacts and proposed mitigation for All Alternatives and analyzed for impacts in the DSEIS and Alternatives 1 through 3 would meet the overall goals and policies related to air, water, noise, critical areas, and resources. All of the Alternatives would implement policies and regulations for reducing greenhouse gas (GHG) emissions consistent with Policy 1.1; and meet all required stormwater management requirements consistent with Policy 1.4. Noise impacts and proposed mitigation are presented in Section 3.8 of the DSEIS. There are critical areas (e.g. rivers, floodplains) within the action area and impacts and mitigation are also presented in the DSEIS (Sections 3.3 and 3.4). Alternative 4 would result in the development of lands presently in agricultural use or production, however, as analyzed in Section 3.6 of the DEIS, these lands are not of long-term commercial significance given location, surrounding urban land uses, high land values and lack of a transfer of development rights (TDR) program.

Housing Element: The Housing Element generally promotes the “preservation of existing housing stock” (Goal 1) and providing “a range of housing types” and “variety” for all economic segments of the community (Goal 2 and Policies 2.2, 2.3, 2.4).

Alternatives 1, 2 and 3 would remove the UV designation and GC zoning from the golf course and options for residential as a component of a “mixed use” project. Further, Alternative 2 would eliminate UV designation and HDR and GC zoning on lands west of the golf course and north and south of Stewart Road and thereby limiting the amount and type of housing potential in this area of the city within close proximity to where people work.

While it is possible to mitigate impacts between residential and industrial uses, elimination of residential uses in what is developed and planned for predominately industrial uses will preclude potential conflicts regarding noise, traffic, and light and glare.

Alternative 4 would retain the existing UV designations, HDR and GC zoning and would not reduce or eliminate the housing in this area.

Transportation: Alternatives 1-4 would be consistent with the goals and policies in the Transportation Element and the Transportation Plan and consistent with the City's adopted Six-year Transportation Improvement Plan (TIP).

All Alternatives were the subject of a traffic impact analysis and impacts and mitigation are analyzed and discussed in Section 3.7 of the DSEIS. Generally, both Stewart Road and 24th Street corridors will require improvements at SRI67 and West Valley Hwy in order to meet Level of Service Standards (LOS) for Alternatives 1 through 3.

Overall, the Transportation Element goals and policies are supported and specifically listed as follows: Overall Goal; Goal 2, Policies 2.4; Goal 3, Policies 3.3, 3.4, 3.6, 3.8, 3.9; Goal 4; Goal 5, Policies 5.9; Goal 6, Policies 6.2, 6.3, 6.4, and Goal 7 and all policies. Goal 8 specifically calls out support for the Sumner-Pacific MIC and the need for funding and development of transportation improvements that meet the needs of large trucks. All Alternatives provide for the construction of 24th Street East across the river, though timing may be different with the No Action Alternative 5 then if there is new development and demand.

Capital Facilities: The City is required to plan for and provide for capital facilities to serve additional growth. The proposal would support the overall goal of providing "effective, efficient and quality capital facilities and public services at the level of service necessary to support a growing community" (Goal 1, Capital Facilities and Public Services Element). The Action Alternatives have been analyzed in the EIS and impacts to sewer, water, and stormwater services and new development will have to connect and improve the service to the area as a condition of development. The area is presently served by City of Sumner water but upgrades to the system will be necessary. Sewer is available at 24th Street and is of an adequate size to accommodate future growth, but it is recommended in the DSEIS that a detailed sewer analysis be completed prior to issuing of building permits. Stormwater drainage design will be required to meet the Department of Ecology Stormwater Manual. An initial evaluation indicated 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. In all Alternatives the level of service for these facilities will be maintained. The Draft SEIS analyzes impacts and mitigation for Public Services and Utilities in Sections 3.9 and 3.10, respectively.

4. The proposed amendment is consistent with chapter 36.70A RCW (Growth Management Act), the countywide planning policies (CPP) for Pierce County, and the applicable Multi-county planning policies (VISION 2040).

All Action Alternatives were analyzed in the Draft SEIS for the 2013 Comprehensive Plan Amendments and found to be consistent or are provided mitigation measures. See Chapter 3, Section 3.6 “Relationship to Plans and Policies” for consistency with GMA, Countywide Planning Policies, and VISION 2040.

5. Where an amendment to the comprehensive plan map is proposed, the proposed designation is adjacent to property having a similar and compatible designation, or the subject property is of sufficient size, or other conditions are present.

Alternative 1 would redesignate/rezone the Sumner Meadows Golf Course property to M-I. Surrounding properties to the north and east are zoned M-I and are vacant or have a similar light manufacturing/industrial land use. The eastern boundary of the site is bordered on the entire length separating the visibility of the site from the East Valley Highway. Properties to the south are zoned Agricultural and would not be impacted by industrial development. Property to the west immediately south of Stewart Road and north of the White (Stuck) River would be High Density Residential (HDR) and General Commercial (GC) where there would be a potential for land use conflicts (noise, light and glare, traffic, etc.) depending on design and site planning. There is also a portion of Low Density Residential (LDR) zoning to the west of the White (Stuck) River that may have some in compatibility; however, there is a 200-foot shoreline buffer that would be required on both sides of the river in this location that would minimize noise, light, glare, and other aesthetic impacts from M-I land uses. Finally, the remainder of land west of the property is zoned M-I with similar existing or allowed land uses as would be anticipated on the golf course site.

Alternative 2 proposes redesignation/rezoning of residential and commercial properties to Light Manufacturing (M-I) in the vicinity of the Sumner Meadows Golf Course property on the north and south sides of Stewart Road. The redesignation would eliminate the potential incompatibility between the residential and commercial land uses in the vicinity of Stewart Road.

Alternative 3 would retain and expand the HDR zoning south of Stewart Road and west of the golf course property and redesignate/rezone the golf course property to M-I. This would create similar incompatibilities as described in Action Alternative 1 above.

Alternative 4 retain the existing land use and zoning on the golf course and in the vicinity, but would change the property south of 24th Street from Agriculture to M-I. Uses to the north are currently agriculture and the golf course, uses to the south, east and west are all industrial zoning and either vacant or of compatible land uses.

6. Environmental impacts have been disclosed, and measures have been included to reduce possible adverse impacts.

The environmental impacts have been disclosed and analyzed in the Draft Supplemental Environmental Impact Statement (DSEIS) prepared for the 2013 Comprehensive Plan Amendments Sumner Meadows Docket.

7. Potential ramifications of the proposed amendment to other comprehensive plan elements and supporting plans have been considered and satisfactorily addressed.

Alternatives 1 through 3 would require amendments to other Comprehensive Plan elements related to the golf course an open space policies. See below the proposed amendments.

Impacts to all supporting plans including the City's transportation, sanitary sewer, water, and stormwater plans have been analyzed and addressed with proposed mitigation in the DSEIS. Development can occur under existing plans with required improvements.

IV. STAFF RECOMMENDATION

Staff recommends that the Planning Commission **APPROVE** Alternative 2 as this provides the most assurances that the area will develop as industrial with minimal impacts to adjacent, less intense uses such as commercial or high density residential. In addition, there may be opportunities for property owners to work collaboratively on issues related to improvements to Stewart Road and access. The conversion of properties to M-I uses would also allow for further expansion of the Sumner-Pacific MIC boundary and inclusion of additional employment moving the City closer to the goal of 20,000 employees by 2040.

V. PLANNING COMMISSION RECOMMENDATION

Pending Public Hearing and comments on DSEIS.

VI. TEXT AMENDMENTS

VISION STATEMENT (p.17)

Amend “Parks, Recreation and Open Space” section, paragraph I as follows:

PARKS, RECREATION AND OPEN SPACE

In 2024, Sumner's park system is a unification of a major sports complex, community parks, and neighborhood parks situated in the various sectors of the City. Each residential area has access to neighborhood parks which become focal points for interaction. Residents and businesses alike enjoy active recreational facilities and programs including baseball, soccer, tennis, **golf**, or others. Picnic areas, arenas and other amenities allow opportunities for concerts and community gatherings. Sumner's recreational facilities are linked by a network of sidewalks and linear trail systems along the Puyallup and White Rivers.

COMMUTER RAIL/REGIONAL TRANSIT SUB-ELEMENT (p. 30-31)

Amend Policies I.6 and I.8 as follows:

GOALS, POLICIES, AND OBJECTIVES

- I. Support regional transit connections in the Sumner Planning Area.
 - I.1 Collaborate when possible with Sound Transit, Pierce County and surrounding cities to do joint planning on future services concerning the commuter rail and transit system.
 - I.2 Work with local property owners to encourage the development of commercial uses compatible with the commuter rail station.
 - I.3 Ensure that the commuter rail station does not have an unreasonable adverse impact on the residential character of the neighborhood.
 - I.4 Consider and pursue opportunities for an increased pedestrian connection to the West Sumner Neighborhood and the Downtown business core such as a pedestrian overpass.
 - I.5 Continue to explore the parking options and access options for the commuter rail station that are compatible with the surrounding land uses, safe, convenient, and attractive. Address options for location of future parking for expanded service over time.

~~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.

~~1.6.1~~ Work with Sound Transit and Pierce Transit throughout the planning, construction, and operation of a station to ensure it is an integral part of the City's transportation system and the regional transit system.

~~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. Complementary land uses such as civic rooms, day care, small retail, or other uses to be integrated with the station may also be included in the station plan.

1.76 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.

1.97 Promote and pursue the use of underutilized parking lots throughout the City as potential remote sites for commuter rail station parking.

~~1.108~~ Seek alternatives to the construction of a stand alone parking garage in the Town Center.

~~1.119~~ Request that Sound Transit provide additional bicycle lockers at the station to encourage bicycle commuting to the station. Require that any expansions to parking for the station include increased bicycle lockers.

~~1.1210~~ 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.

LAND USE SUB-ELEMENT (p. 48)

Amend description of Private Public Utility Facility as follows:

~~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.~~

PARKS AND OPEN SPACE ELEMENT (p. 72)

Amend policies 2.7 and 2.10 as follows:

- 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.~~

- 2.10 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 is defined in the Parks and Open Space Plan should refer to those areas of planted surface which provide substantial open space value.~~

VII. MAP AMENDMENTS

Exhibits:

- A-1 Alternative 1 Comprehensive Plan Map Amendments
- A-2 Alternative 1 Zoning Map Amendments

- B-1 Alternative 2 Comprehensive Plan Map Amendments
- B-2 Alternative 2 Zoning Map Amendments

- C-1 Alternative 3 Comprehensive Plan Map Amendments
- C-2 Alternative 3 Zoning Map Amendments

- D-1 Alternative 4 Comprehensive Plan Map Amendments

- D-2 Alternative 4 Zoning Map Amendments

- E-1 No Action Alternative 5 Comprehensive Plan Map Amendments
- E-2 No Action Alternative 5 Zoning Map Amendments

- F Parks and Open Space Map, Figure 14
- G Major Pedestrian System Plan, Figure 16
- H Bicycle and Trail System Plan, Figure 17

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

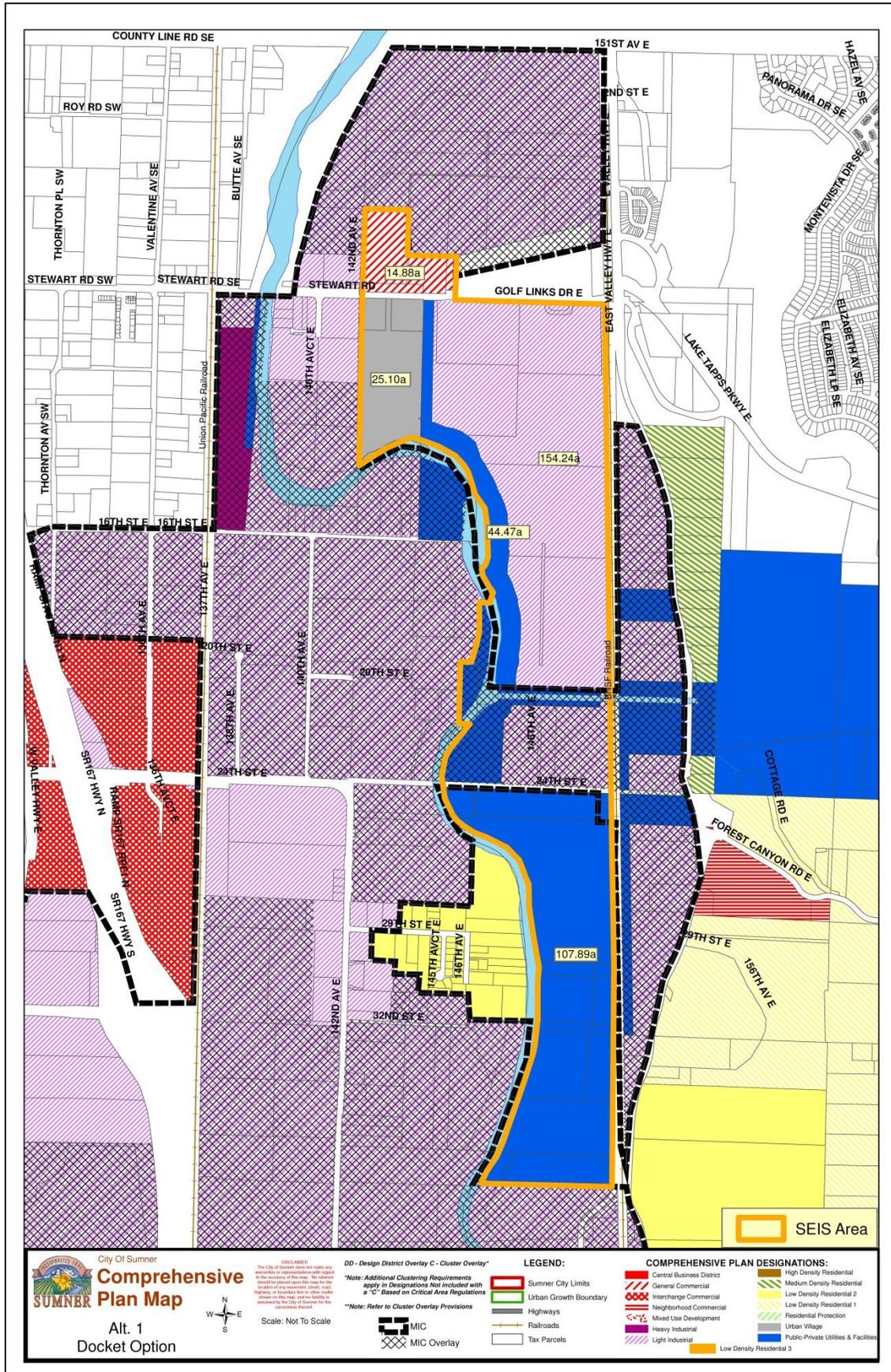


Exhibit A-2. Alternative 1 Sumner Meadows Docket Application – Zoning Map

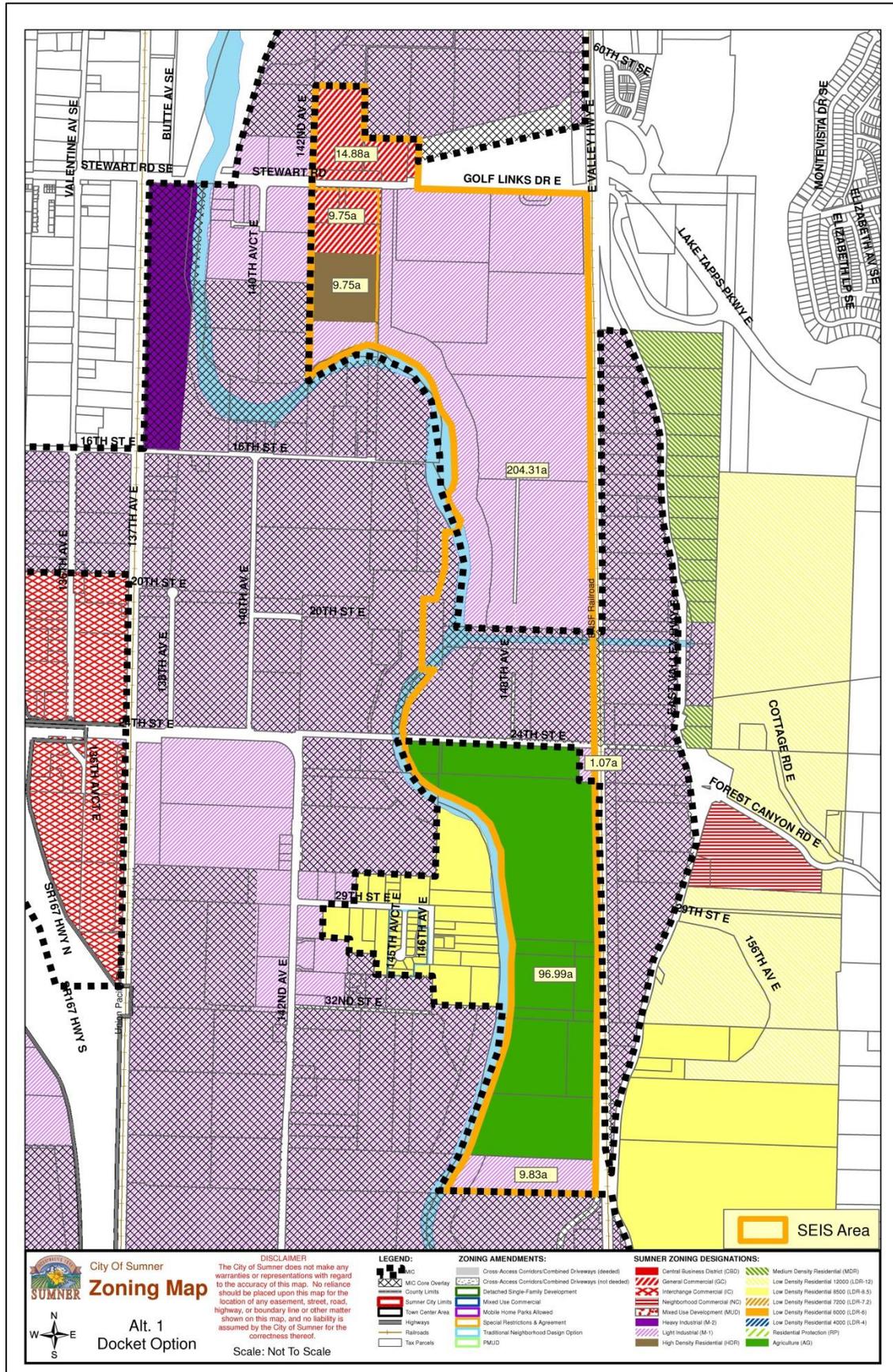


Exhibit B-1. Alternative 2 Areawide Industrial – Comprehensive Plan Map

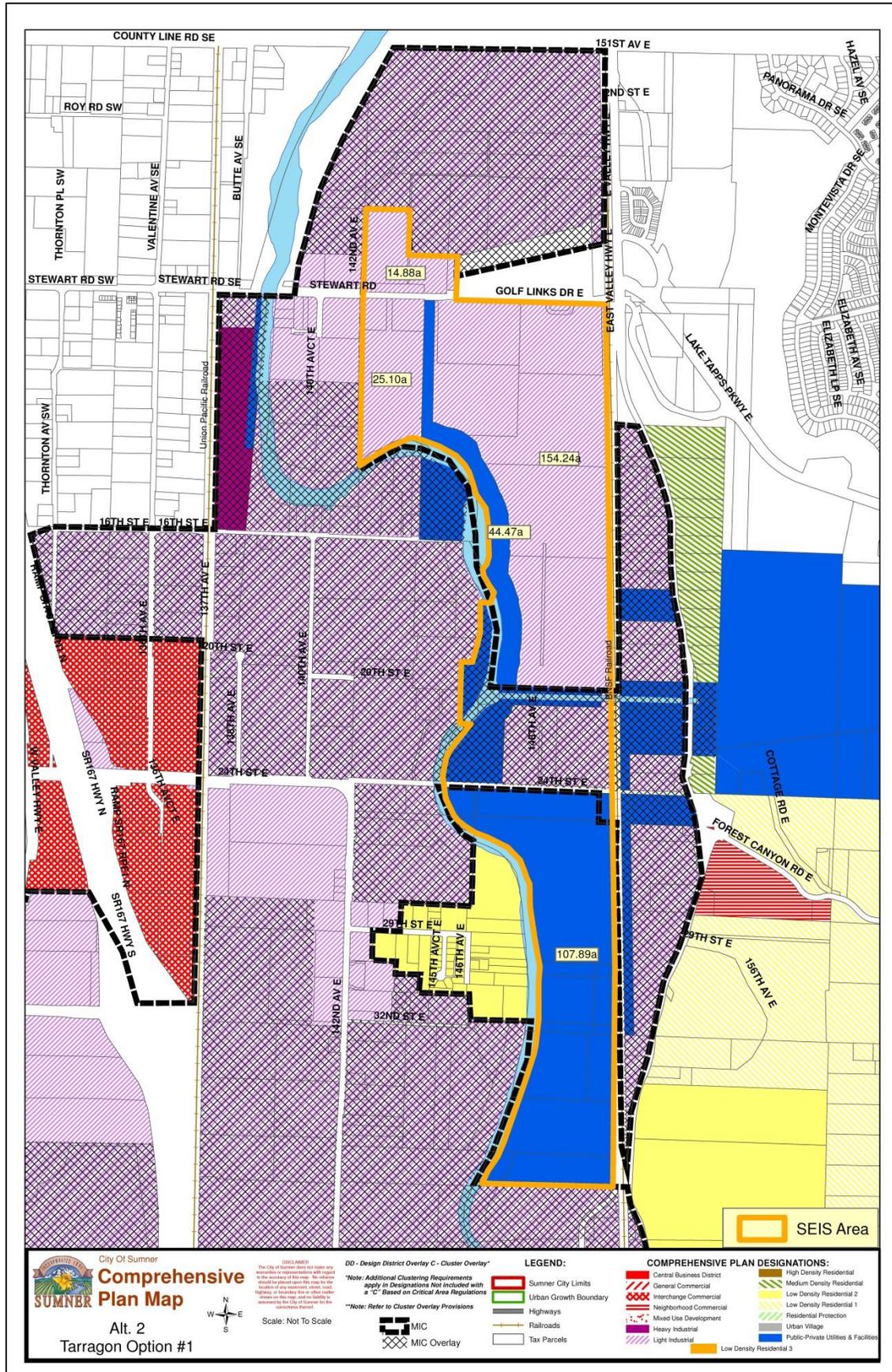


Exhibit B-2. Alternative 2 Areawide Industrial – Zoning Map

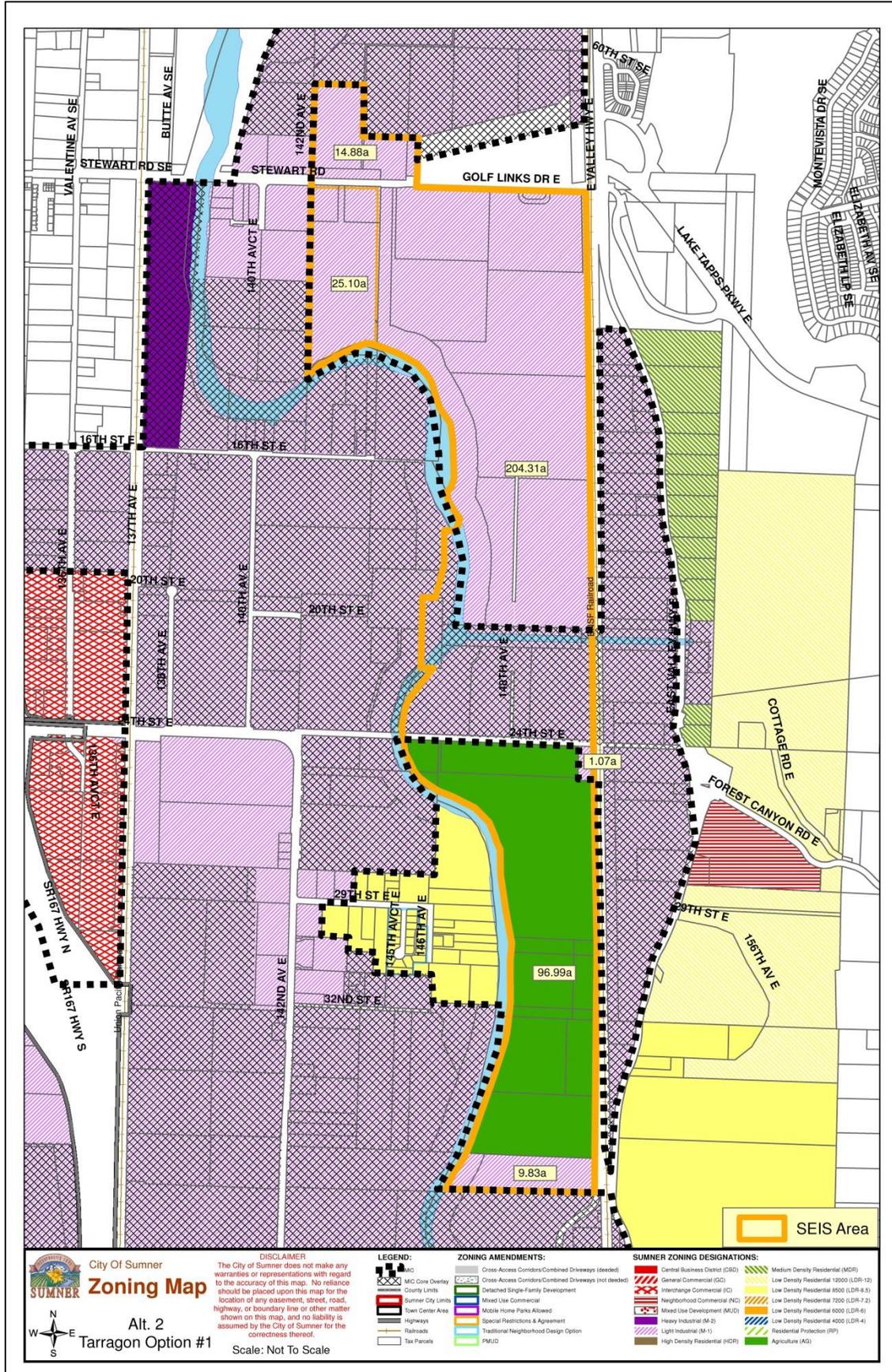


Exhibit C-2. Alternative 3 Areawide Industrial and Residential – Zoning Map

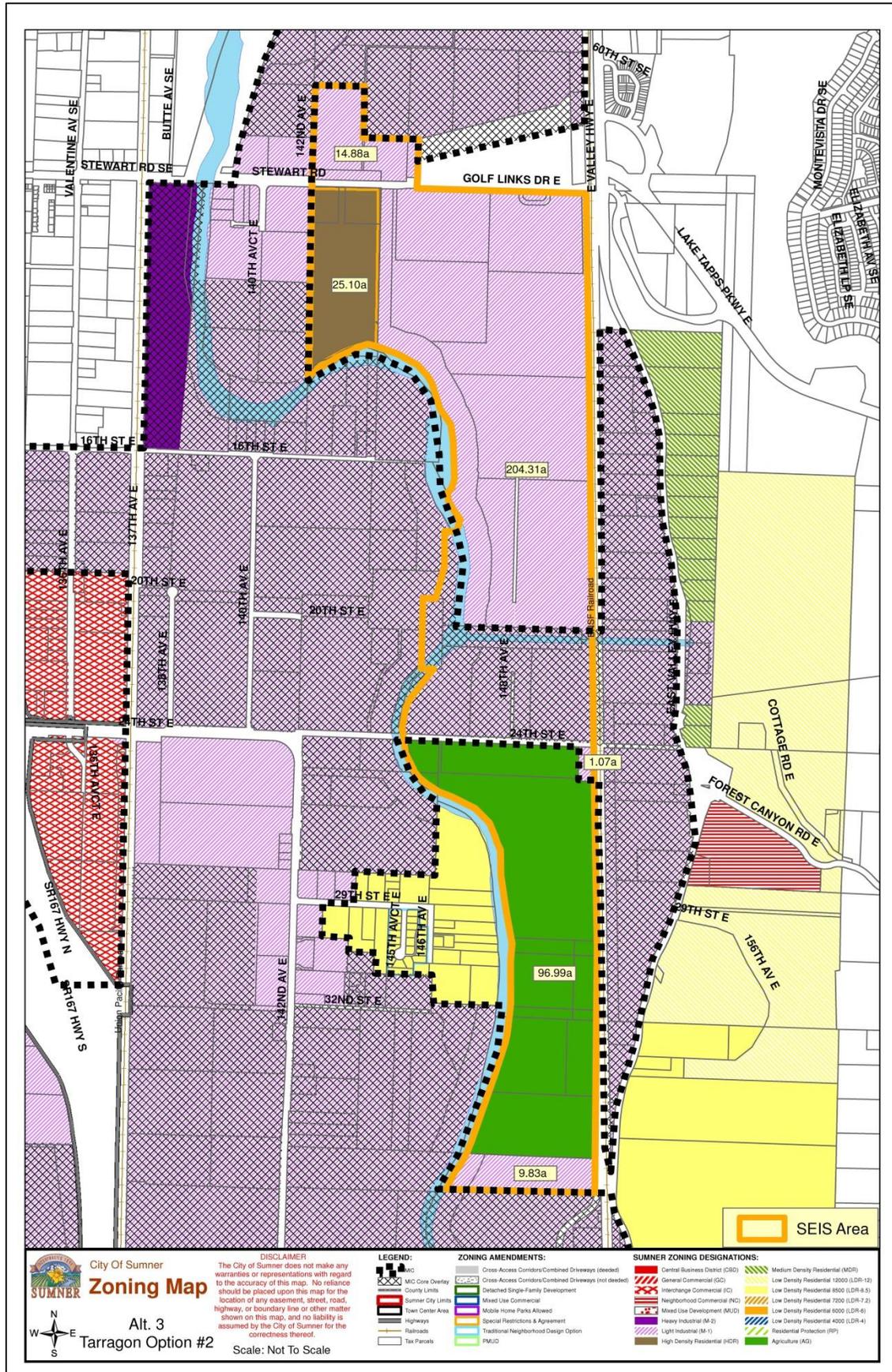


Exhibit D-1. Alternative 4 Offsite Alternative – Comprehensive Plan Map

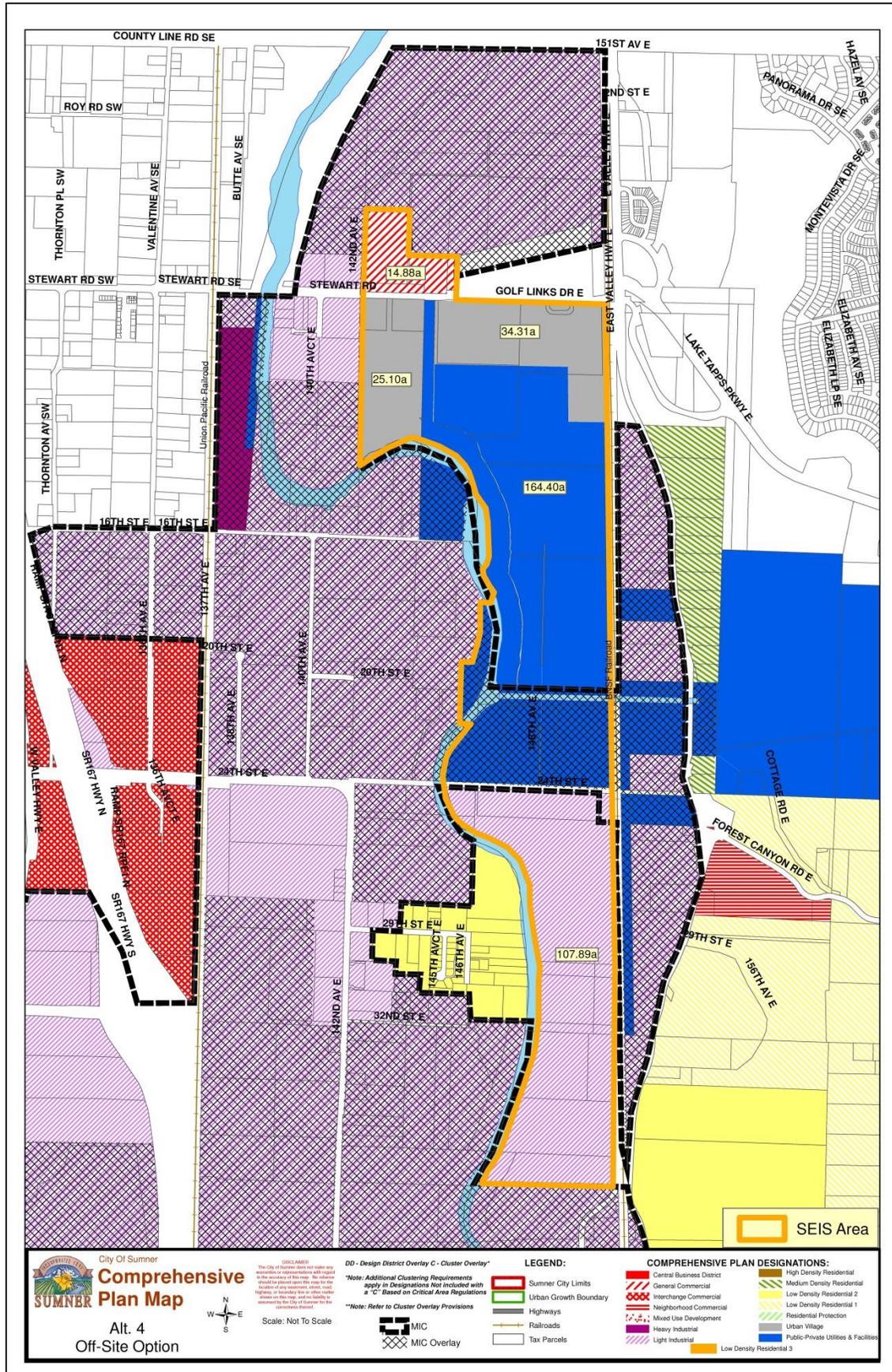


Exhibit D-2. Alternative 4 Offsite Alternative – Zoning Map

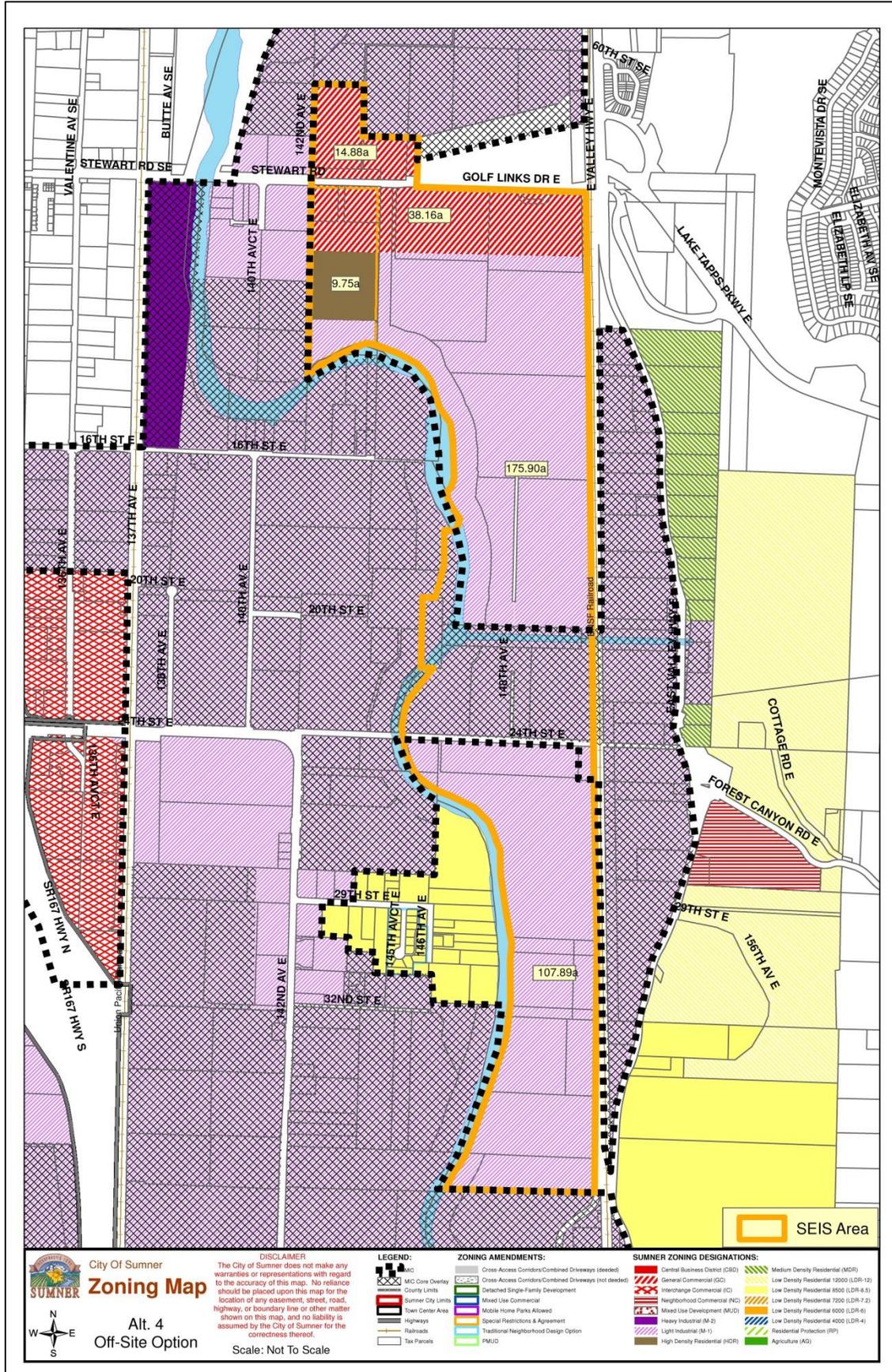
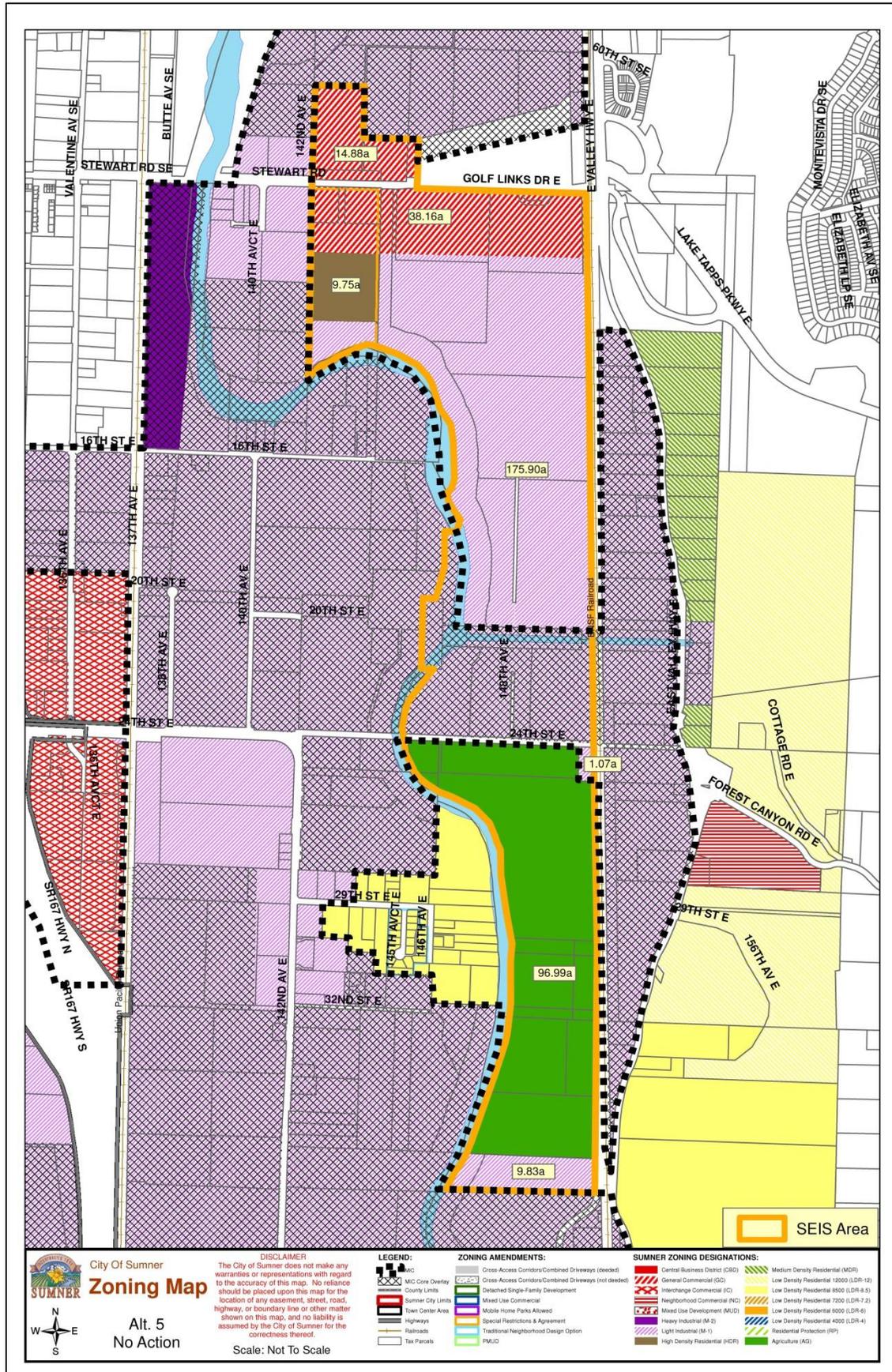


Exhibit E-2. No Action Alternative 5 – Current Zoning Map



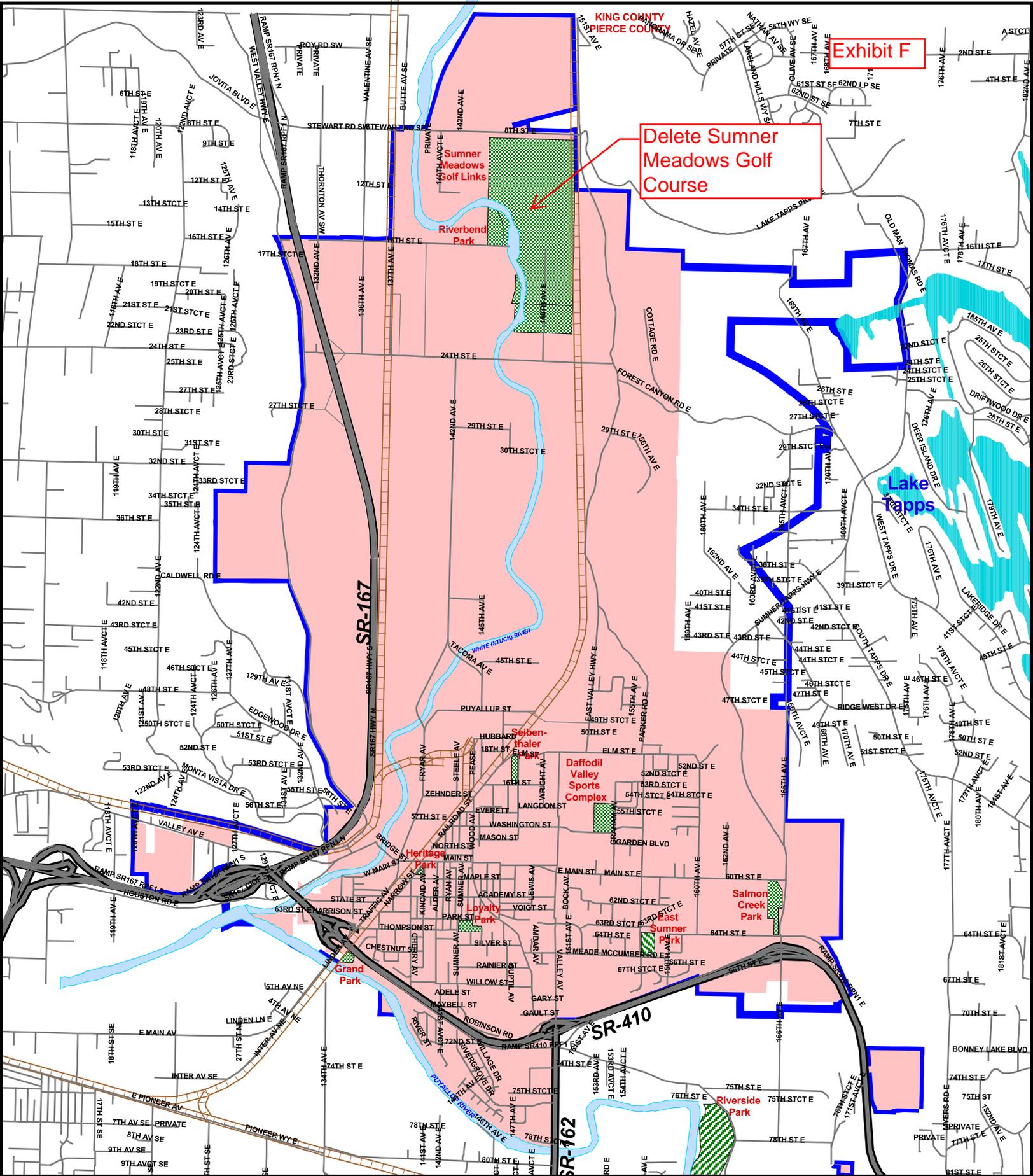


Exhibit F

Delete Summer Meadows Golf Course

Figure: 14

Source: City of Sumner Community Development / Parks Department



- LEGEND:
- Sumner City Limits
 - Sumner UGA
 - Sumner Parks & Recreation Areas
 - Pierce County Park
 - Sumner Park, Under Construction



City of Sumner
Comprehensive Plan

Parks & Open Space Map

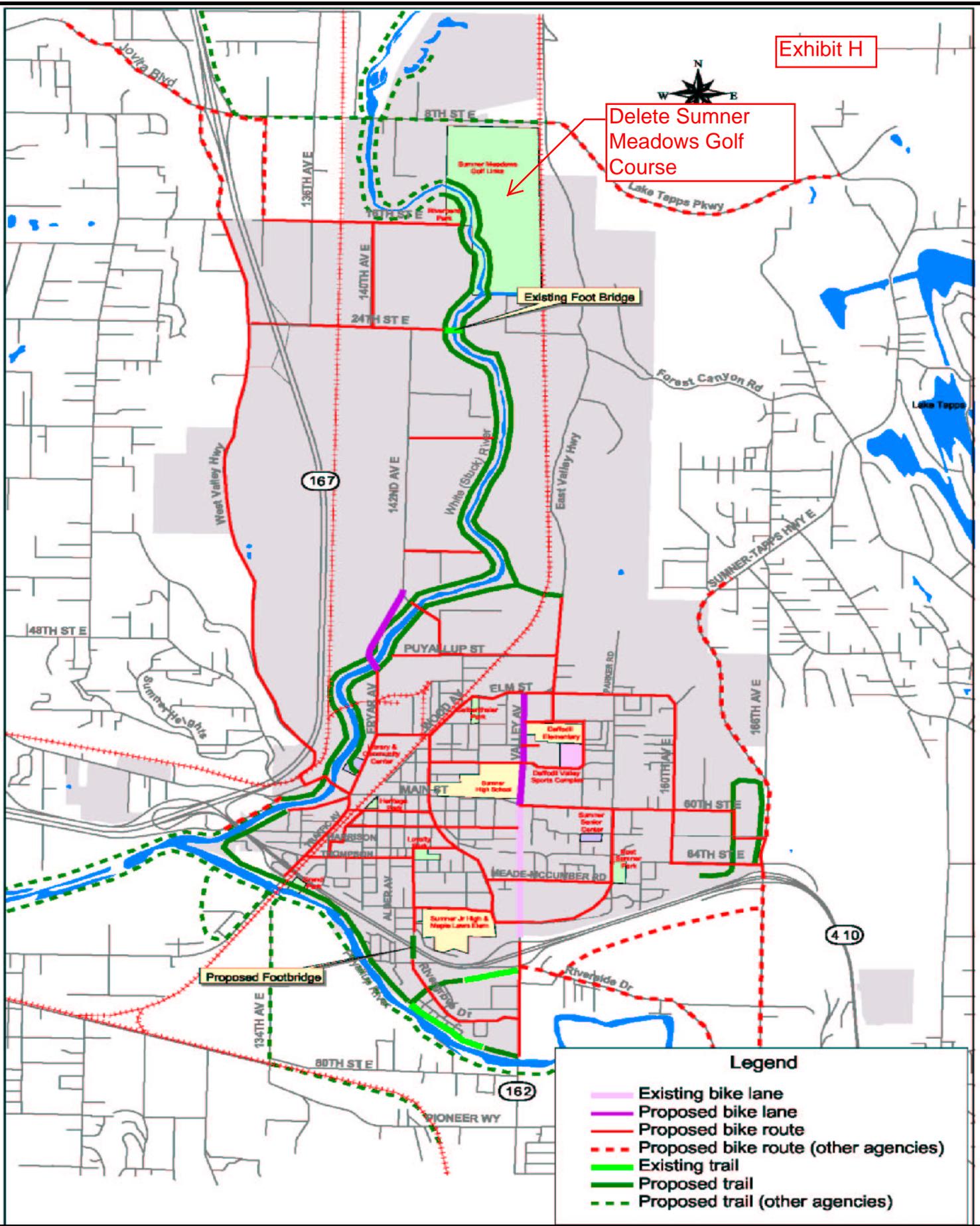


Figure: 17

Source: City of Summer
Community Development / Parks Department
Parametrix Engineering Inc.



City of Summer
Comprehensive Plan

Bicycle & Trail System Plan

