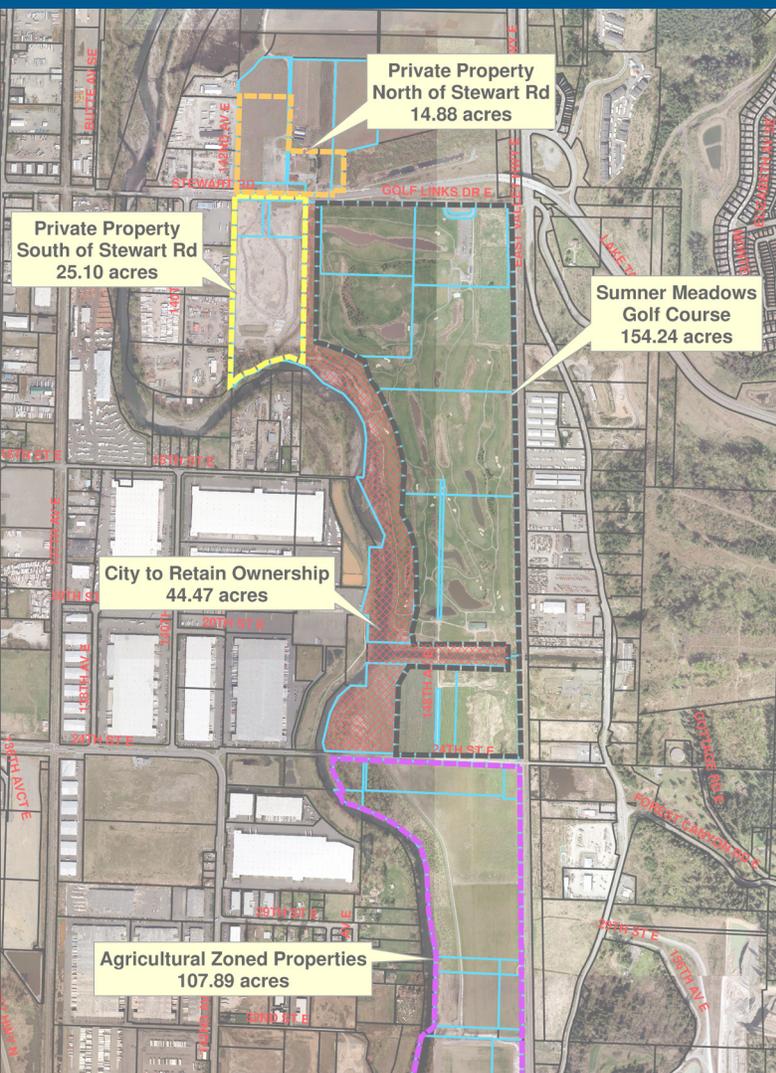


# FINAL



## City of Sumner 2013 Comprehensive Plan Annual Amendments

### SUMNER MEADOWS DOCKET

### Final Supplemental Environmental Impact Statement

July 2014

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Community Development Department  
Paul Rogerson, AICP, Director

July 25, 2014

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

Dear Reader:

The City of Sumner has issued a Final Supplemental Environmental Impact Statement (Final SEIS) for the City of Sumner 2013 Comprehensive Plan Annual Amendments, addressing map and text docket applications that would amend the Sumner Comprehensive Plan and development regulations related to the surplus of the Sumner Meadows Golf Course for private development of light industrial uses, a use that is allowed by current underlying zoning.

The study area is generally bounded by Stewart Road on the north, on the east by the BNSF railroad tracks, on the south by 24<sup>th</sup> Street East, and on the west by the White (Stuck) River. Alternatives address the Sumner Meadows Golf Course plus adjacent properties. The total land area of the golf course (primary study area), and adjacent study area including private lands considered for reclassification north and south of Stewart Road, and the City-owned agricultural land south of the golf course is approximately 346.58 acres.

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

A Draft SEIS was issued in May 2014 and was the subject of a 30-day comment period. This Final Supplemental Environmental Impact Statement (Final SEIS) completes the environmental review process by providing responses to comments received regarding the Draft SEIS along with clarifications and corrections.

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

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

Sincerely,

Paul Rogerson, Community Development Director and SEPA Responsible Official

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# FACT SHEET

## Title

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

## Study Area

The primary Study Area is generally bounded by Stewart Road on the north, on the east by the BNSF railroad tracks, on the south by 24<sup>th</sup> Street East, and on the west by the White (Stuck) River. This primary study area contains the Sumner Meadows Golf Course and is approximately 154 acres in area (excludes lands to be reserved along the river as Public-Private Utilities and Facilities).

Alternatives address the Sumner Meadows Golf Course plus adjacent properties. The total land area of the golf course (primary study area), and adjacent study area including private lands considered for reclassification north and south of Stewart Road, and the City-owned agricultural land south of the golf course is approximately 346.58 acres. See the summary of alternatives below and Draft Supplemental Environmental Impact Statement (Draft SEIS) Chapter 2 for additional description of area under review.

Some SEIS topics addressed the growth in the primary and adjacent study areas as well as cumulative growth across the city limits and urban growth area such as air quality, transportation, and land capacity.

## Proposal and Alternatives

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

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

Alternatives to the Proposal include:

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

## Proponent

City of Sumner

## Tentative Date of Implementation

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

## Lead Agency

City of Sumner

## Responsible Official

Paul Rogerson  
Community Development Director, AICP

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## Required Licenses and Approvals

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

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

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**City of Sumner Community Development Department**

(See Contact Person above)  
(GIS)

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

**Date of Draft Supplemental Environmental Impact Statement Issuance and associated Comment Period**

The Draft SEIS was issued on May 15 2014 and written comments were due 5 pm on June 16, 2014. This Final SEIS responds to comments on the Draft SEIS.

**Date of Final Supplemental Environmental Impact Statement Issuance**

July 25, 2014

**Date of Final Action**

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

**Prior and Future Environmental Review**

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

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

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

**Location of Background Information**

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

## **Final Supplemental Environmental Impact Statement Cost**

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

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Appendix C: Documentation of Flood Model
Appendix D: 24th Street East Setback Levee Feasibility Study
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## 1.0 SUMMARY

The City of Sumner is considering map and text docket applications to amend its Comprehensive Plan and development regulations related to the surplus of the Sumner Meadows Golf Course and anticipated private development of light industrial uses, a use that is allowed by underlying zoning. The Draft Supplemental Environmental Impact Statement (Draft SEIS) issued on May 15, 2014, presented a description of five alternatives and an evaluation of several environmental elements. This Final Supplemental Environmental Impact Statement (Final SEIS) completes the environmental review process by providing responses to comments received regarding the Draft SEIS along with clarifications and corrections. References to the Final SEIS are to this document whereas references to the Supplemental Environmental Impact Statement (SEIS) include both the Draft SEIS and the Final SEIS.

This Final SEIS includes the following chapters and appendices:

- **Chapter 1.0** describes the Proposal and Alternatives studied in this SEIS.
- **Chapter 2.0** provides clarifications and corrections to the Draft SEIS.
- **Chapter 3.0** provides responses to comments received during the 30-day comment period for the Draft SEIS over May and June 2015.
- **Chapter 4.0** provides references cited in this document.
- **Chapter 5.0** provides a distribution list of agencies and individuals sent a notice of availability of this document.
- **Appendix A** presents the numbered comment letters received on the Draft SEIS during the SEPA comment period.
- **Appendix B** presents the City staff recommendation regarding the docket proposal including the recommended alternative.
- **Appendix C** provides the 2011 24th Street East Setback Levee Feasibility Study prepared by Parametrix for the City. .
- **Appendix D** provides documents in support of the City's Flood Model.
- **Appendix E** Presents excerpts from the Lower White River Biodiversity Management Area Draft Stewardship Plan.

With the exception of Chapter 1.0 Summary, this Final SEIS does not repeat the entire contents of the Draft SEIS, and both documents should be considered together.

### 1.1 Purpose of the Proposal

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

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

## 1.2 SEPA Procedures and Public Involvement

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

### 1.2.1 Purpose of the SEIS

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

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

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

### 1.2.2 SEIS Scope

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

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

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

### 1.3 Proposed Action, Alternatives, and Objectives

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

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

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

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

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

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

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

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

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

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

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

### **Alternative 4 Offsite Alternative**

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

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

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

## **1.4 Summary of Impacts**

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

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

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

**Earth**

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

**Air Quality**

- Construction emissions include fugitive dust from excavation and grading activities, diesel-powered engine emissions from construction vehicles and equipment, odors detectable to people in the vicinity of construction activities (such as paving operations), and increases in general traffic-related emissions due to delays caused by construction equipment and material hauling activity. Construction activity and equipment must comply with relevant Puget Sound Clean Air Agency (PSCAA) regulations. However, despite compliance with such regulations, local construction-related emissions could cause temporary, localized impacts to air quality. No slash burning would be permitted in association with any of the studied alternatives.
- Under all of the alternatives, the study area<sup>1</sup> is expected to experience air quality impacts due to commercial/business operations. These operations could cause air pollution issues at adjacent residential properties, unless properly controlled. Sources of such emissions include stationary equipment (such as gas stations), mechanical equipment (such as heating units), and trucks at loading docks at office and retail buildings. However, all new commercial and business facilities would be required to register stationary pollutant-emitting equipment with the PSCAA and comply with PSCAA standards to minimize emissions. Therefore, it is unlikely that new commercial and business operations would cause significant air quality issues.
- Localized tailpipe emissions from vehicles traveling on public roads would be the major source of air pollutant emissions associated with any of the studied alternatives. Potential air quality impacts caused by increased tailpipe emissions are divided into two general categories: Carbon monoxide (CO) hot-spots caused by localized emissions at heavily congested intersections; and regional photochemical smog caused by combined emissions throughout the Puget Sound region. With respect to localized hot-spot air quality, it is unlikely that increased vehicle travel on existing public roads would cause significant localized air pollutant concentrations at local intersections, forming a hot-spot. Furthermore, ongoing U.S. Environmental Protection Agency (EPA) motor vehicle regulations have provided steady decreases in tailpipe emissions from individual vehicles, and it is possible that those continuing decreases from individual vehicles could more than offset the increase in vehicle traffic. For these reasons, it is unlikely that air quality impacts at local intersections would be significant.
- In terms of regional impacts, tailpipe emissions for all of the alternatives would be very small relative to the overall regional tailpipe emissions within the Puget Sound air basin. Based on the Puget Sound Regional Council's (PSRC's) air quality conformity analysis, forecasted regional emissions for its 2040 planning year are far below the allowable budgets. None of the studied alternatives would cause a substantial percentage increase in regional vehicle miles traveled (VMT) throughout the Puget Sound air basin. Therefore, it is concluded none of the alternatives would result in a significant impact to regional air quality.

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<sup>1</sup> As described in the Draft SEIS, the study area for the air quality analysis consists of the city limits and urban growth area.

- Future development with all the alternatives could require future improvements (e.g., street widening) to existing roadways. Roadway widening could result in receptors moving closer to areas where localized levels of mobile source air toxics (MSAT) emissions would be higher, but this could be offset due to reductions in congestion (which are associated with lower MSAT emissions). Furthermore, on a regional basis, the EPA's vehicle and fuel regulations (coupled with ongoing future fleet turnover) will, over time, result in significantly lower region-wide MSAT levels in most cases.

### ***Flooding***

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

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

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

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

#### LAND USE

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

#### POPULATION, EMPLOYMENT AND HOUSING

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

#### AESTHETICS

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

***Relationship to Plans and Policies***

## GROWTH MANAGEMENT ACT

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

## MULTICOUNTY PLANNING POLICIES

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

## COUNTYWIDE PLANNING POLICIES

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

## SUMNER VISION AND COMPREHENSIVE PLAN ELEMENTS

- The Sumner Vision Statement includes broad references to open space, agriculture, and employment. None of the alternatives would directly conflict with the City's Vision and Comprehensive Plan Policies. Conversions of the golf course or agricultural property south of it would require some text amendment of the Comprehensive Plan.
- The Vision encompasses the whole City and is not specific to the study area; the City is to balance and weigh the Vision Statement. All Alternatives would promote continued economic development. While open space and recreation area would diminish under Alternatives 1, 2, and 3, and agricultural use would diminish under Alternative 4, the City would retain land important for habitat, open space, and recreation along the White (Stuck) River. In the remainder of the City, the watersheds, schools, and parks would continue to provide open space, parks, and recreation. Under Alternative 5, the Vision Statement would still be supported.
- Redesignation of lands classified Public and Private Facilities and Utilities to Light Manufacturing would be consistent with the broader planned Light Manufacturing land use in the valley.
- Under all alternatives studied, land along the White (Stuck) River would stay in public designation and use for trail, open space, habitat restoration and flood control purposes. The White (Stuck) River open space corridor is intended to enhance the work environment with trails as well as provide riparian habitat.
- The conversion of the City-owned agricultural land under Alternative 4 would reduce the use in the city. Alternatives 1, 2, 3, and 5 would not redesignate the City-owned agricultural land. Alternatives 2 and 3 assume the conversion of private land mapped by the City as agricultural resource lands north and south of Stewart Road. The conversion of the agricultural land would reduce the use in the city; however, the lands are not considered of long-term commercial significance because: 1) the land is isolated from other agricultural properties in Pierce County; 2) the land is surrounded by urban development inside city limits; 3) the lands have land values reflecting their location in a city with services and infrastructure and intensity of nearby industrial use, and 4) there is no transfer of development rights program per WAC 365-190-050.

## SUMNER MEADOWS DOCKET FINAL SEIS | SUMMARY

### SUMNER ZONING CODE

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

### SUMNER SHORELINE MASTER PROGRAM

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

### **Transportation**

- **Traffic Operations** – Eight intersections are projected to operate at LOS E or LOS F in 2030 with all alternatives. Of these, four intersections located in Sumner (Traffic Avenue/Main Street, Alder Avenue/Main Street, Traffic Avenue/SR 410 westbound ramps, Traffic Avenue/SR 410 eastbound ramps) are not subject to the LOS D concurrency standard, as per existing adopted City Transportation Element policies 3.1 and 3.3 (City of Sumner 2012). The remaining four intersections are stop-sign controlled. East Valley Highway/Elm Street is projected to operate at LOS E and 160th Avenue E/Main Street is projected to operate at LOS F with Alternative 5 (No Action). These two intersections are located more than two miles south of the alternative sites, and the SEIS action alternatives are expected to add very little additional delay (less than 4 seconds per vehicle) at these locations. 136th Avenue E/24th Street E and SR 167 southbound ramps/Stewart Road SE are both projected to operate at LOS F with Alternative 5 (No Action). Since these intersections are located near the alternative sites the SEIS alternatives are expected to add a greater amount of delay at these locations. The SR 167 southbound ramps/Stewart Road SE intersection is operating at LOS F under existing conditions. Additional traffic generated by regional growth, as well as by the SEIS alternatives, is expected to worsen conditions at this intersection. However, this intersection, located in the City of Pacific, is a designated as a highway of statewide significance (HSS) facility and would not be subject to local city standards; it is under Washington State Department of Transportation (WSDOT) jurisdiction.
- **Freight Movement** – The majority of trips generated by all SEIS alternatives are expected to travel between the alternative sites and SR 167, via Stewart Road SE and 24th Street E. Because all alternatives would include industrial development similar in character to the existing industrial uses in the area, it is expected that they would generate truck traffic similar in proportion to that currently generated along Stewart Road SE and 24th Street E. However, both corridors are have Freight and Goods Transportation System (FGTS) designations established by WSDOT, and are identified by the City as truck routes. Additional truck traffic generated by the SEIS alternatives would be similar to what is already occurring on Stewart Road SE and 24th Street E, and is consistent with local and statewide policies.
- **Site Access, Circulation, and Parking** – With all alternatives, the facilities and site design needed to support internal vehicle access, circulation, parking, pedestrian movement, and bicycle movement would be determined at the project level when specific development proposals are submitted. Vehicular and non-motorized access and circulation, as well as parking requirements, would be subject to City development code. The requirement would be documented in the traffic impact analysis completed as part of project-level SEPA review.
- **Transit** – With no fixed-route transit service provided in the vicinity of the proposal study area, it is expected that none of the alternatives would generate transit demand.

**Noise**

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

**Public Services**

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

**Utilities**

- **Water:** Development under all action alternatives would increase water demand in the study area, though precise levels of demand generated by each alternative would vary by the intensity of development proposed.
- **Wastewater:** Development under all action alternatives would increase wastewater flows from the study area, requiring conveyance and treatment, thus placing greater demand on the City's wastewater collection system.

- **Stormwater:** Additional development under action alternatives will substantially increase the amount of impervious surfaces in the study area, which has the potential to increase stormwater flows requiring detention and treatment.
- **Telecommunications:** Telecommunication services are provided by private service providers. The cost of provided satisfying increased demand would be borne by the providers, and no significant impacts associated with telecommunications are anticipated under any of the studied alternatives.

#### 1.4.2 Summary of Impacts by Alternative

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

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

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

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

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

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

## 1.5 Mitigation Measures

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

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

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

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

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

Topics	Mitigation Measures
<p><b>3.6 Relationship to Plans and Policies</b></p>	<ul style="list-style-type: none"> <li>• Alternatives 1, 2, and 3 would amend the Comprehensive Plan text, policies and map to: 1) reduce text conflicts including the two descriptions of the Public and Private Facilities and Utilities, 2) remove conflicts with references to the golf course, and 3) adjust policies on open space retention to recognize the future redevelopment of the study area.</li> <li>• Under any of the Action Alternatives, the City would adopt M-1 code amendments and incentives to reduce future emission levels below a threshold recommended by Ecology. See the Section 3.2 of this SEIS.</li> <li>• The Sumner Municipal Code includes zoning and design standards intended to allow for compatible development.</li> <li>• The City could pursue additional service from pierce County Transit based additional trips.</li> </ul>
<p><b>3.7 Transportation</b></p>	<ul style="list-style-type: none"> <li>• Build-out of Alternatives 1 through 4 would require that the City add the 24<sup>th</sup> Street Extension project to its long-range Transportation Improvement Plan. The City’s current TIP includes a corridor study for this connection as Project</li> <li>• With the No Action and all Action alternatives, any new development projects proposed within the alternative sites would be subject to the following regulations as part of project-level SEPA review. <ul style="list-style-type: none"> <li>• Project-level traffic impact analyses are required, which typically include a development-level analysis of roadway operations, safety, parking, access, and non-motorized impacts.</li> <li>• Proposed projects must also pay road impact fees established under the Concurrency Management System (SMC Chapter 12.36) to contribute their share toward citywide transportation improvement projects identified to support growth in development.</li> <li>• The development must adhere to the City's development code, including parking requirements and guidelines for frontage and non-motorized improvements.</li> </ul> </li> <li>• Roadway capacity improvements common to all alternatives <ul style="list-style-type: none"> <li>▪ East Valley Highway/Elm Street – Install a traffic signal (Jurisdiction: City of Sumner).</li> <li>▪ 160th Avenue E/Main Street – Install a traffic signal (Jurisdiction: City of Sumner).</li> <li>▪ 136th Avenue E/24th Street E – Install a traffic signal (Jurisdiction: City of Sumner).</li> <li>▪ SR 167 southbound ramps/Stewart Road SE – Install a traffic signal and coordinate with the signal at East Valley Highway/Jovita Boulevard E (Jurisdiction: WSDOT/City of Pacific for SR 167 southbound ramps/Stewart Road SE, Pierce County for East Valley Highway/Jovita Boulevard E).</li> </ul> </li> <li>• Additional roadway capacity improvements for Alternatives 1 through 3 <ul style="list-style-type: none"> <li>▪ West Valley Highway/SR 167 southbound ramps – Potentially change current westbound configuration were from double right-turn lanes and a single left-turn lane, to double left-turn lanes and a single right-turn lane, and modify phasing to provide for protected westbound left turns and allow two receiving lanes on southbound West Valley Highway. Review of AM peak hour volumes would need to be conducted to determine if this reconfiguration can be accommodated in the morning. If not, the westbound leg could be widened to provide double left-turn and double right-turn lanes. It is also possible that WSDOT could choose to allow this intersection to operate at LOS E if future traffic growth occurs at the rate projected through 2030. (Jurisdiction: WSDOT/City of Sumner)</li> <li>▪ 142nd Avenue E/24th Street E – Install a traffic signal. Provide a left-turn lane and right-turn lane in the southwest direction. Operations at this intersection would be studied in detail as part of the 24th Street Corridor Study (Project A9 in the City’s 2014-2019 TIP), which could result in different improvements at this intersection based on a comprehensive corridor-wide strategy. (Jurisdiction: City of Sumner)</li> </ul> </li> <li>• At all existing stop-controlled intersections currently projected to operate at LOS E or LOS F by 2030, traffic signal warrants established in the <i>Manual for Uniform Traffic Control Devices</i> (FHWA 2012) would typically need to be met before a traffic signal is installed. It is possible for a stop-controlled intersection to operate at LOS E or LOS F during the PM peak hour without having high enough overall traffic volumes to meet signal warrant criteria. In this case, the agency with jurisdiction (City or WSDOT) may need to adopt policy that allows a higher level of service until such time that traffic volumes are high enough to warrant installation of a traffic signal.</li> </ul>
<p><b>3.9 Noise</b></p>	<ul style="list-style-type: none"> <li>• Policies encouraging alternative modes of transportation could reduce the potential for transportation noise sources.</li> <li>• All alternatives include Transportation Element policies that promote bike paths, trails, and sidewalks.</li> <li>• The No Action Alternative would allow for on-site mixed uses, including residential, that could</li> </ul>

Topics	Mitigation Measures
	<p>allow for more non-motorized travel and access to nearby public transit facilities.</p> <ul style="list-style-type: none"> <li>The City could require each industrial or commercial facility proposed for construction within 500 feet of residentially zoned parcels to conduct a project-specific community noise impact assessment to demonstrate compliance with the City’s noise ordinance.</li> <li>For Planned Mixed-Use Developments, the City could require compliance with the noise ordinance for non-residential land uses within the study area parcels, as well as for uses on adjacent parcels.</li> </ul>
<p><b>3.8 Public Services</b></p>	<p>Any projects in the Study Area would have to comply with all City requirements listed in Section 3.9.3.</p> <p>Police Services</p> <ul style="list-style-type: none"> <li>The City should continue to monitor demand for services and review staffing levels, particularly police, and equipment needs through the normal annual budgeting process.</li> </ul> <p>Fire and Emergency Medical Services</p> <ul style="list-style-type: none"> <li>The City and East Pierce Fire and Rescue (EPF&amp;R) should review the precise fire protection and emergency medical needs of proposed development prior to building permit issuance to ensure that EPF&amp;R can adequately respond to anticipated incidents, including specialized needs for handling hazardous materials if applicable.</li> </ul> <p>Parks and Recreation</p> <ul style="list-style-type: none"> <li>Industrial development in the study area should be required to provide adequate visual screening along trail corridors to preserve aesthetic qualities. On-site trail access should be preserved where public safety allows.</li> <li>The City should consider the collection of park mitigation fees for large developments such as large multifamily proposals that have the potential to increase demand on City parks. The City may also require onsite open space for use by residents.</li> </ul> <p>Schools</p> <ul style="list-style-type: none"> <li>The City, along with Dieringer School District and Auburn School District, should consider modification of the City’s impact fees to account for multifamily residential development in the service areas of these districts.</li> </ul> <p>Solid Waste</p> <ul style="list-style-type: none"> <li>Future industrial and multifamily developments would contract directly for solid waste services with service providers, which in Sumner is DM Disposal.</li> </ul>
<p><b>3.9 Utilities</b></p>	<ul style="list-style-type: none"> <li>The Sumner Comprehensive Plan and Water, Wastewater and Stormwater functional plans would be applicable to all alternatives, including level of service and low impact development policies.</li> <li>All development in Sumner is required to comply with the City’s stormwater regulations as established in the City’s 2011 Stormwater Comprehensive Plan and the 2010 Washington State Department of Ecology Stormwater Manual, adopted by SMC 13.48.030.</li> </ul> <p>Water and Wastewater</p> <ul style="list-style-type: none"> <li>Prior to issuance of a building permit, the applicant shall prepare and submit a detailed analysis of the effects of their proposed project design on the City’s water and wastewater systems, to be reviewed by the City. The analysis must consider existing and planned utility infrastructure in the vicinity and estimate water demand and sewer flows resulting from the project.</li> </ul> <p>Stormwater</p> <ul style="list-style-type: none"> <li>Prior to issuance of a building permit, the applicant shall provide an analysis of projected stormwater flows resulting from the project for City review. The analysis shall include a stormwater control plan that illustrates flow control and water quality features, as well as discharge points, and demonstrate how the proposed project will meet the requirements of the City’s stormwater design requirements and the latest edition of the Washington State Department of Ecology Stormwater Manual adopted by the City at the time of permit application.</li> </ul>

## 1.6 Significant Unavoidable Adverse Impacts

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

### Earth

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

### Air Quality

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

### Flooding

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

### Plants/Animals

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

### Land Use, Aesthetics, and Socioeconomics

#### *Land Use*

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

#### *Aesthetics*

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

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

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

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

***Relationship to Plans and Policies***

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

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

***Transportation***

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

***Noise***

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

***Public Services***

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

***Utilities***

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

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

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

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

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## 2.0 CLARIFICATIONS AND CORRECTIONS TO THE DRAFT SEIS

This Chapter provides clarifications and corrections to the Draft Supplemental Environmental Impact Statement (Draft SEIS) due to responses to comments or due to review by City staff or consultants. Changes are noted in the order of the Draft SEIS Chapters and subsections. Insertions are noted as underlined text and deletions are noted with stricken text.

### Correction 1.

The Fact Sheet study area description from the Draft SEIS is modified as follows:

The primary Study Area is generally bounded by Stewart Road on the north, on the east by the BNSF railroad tracks, on the south by 24<sup>th</sup> Street East, and on the west by the White (Stuck) River. This primary study area contains the Sumner Meadows Golf Course and is approximately 154 acres in area (excludes lands to be reserved along the river as Public-Private Utilities and Facilities).

Alternatives address the Sumner Meadows Golf Course plus adjacent properties. The total land area of the golf course (primary study area), and adjacent study area including private lands considered for reclassification north and south of Stewart Road, and the City-owned agricultural land south of the golf course is approximately 346.58 acres. See the summary of alternatives below and Draft Supplemental Environmental Impact Statement (Draft SEIS) Chapter 2 for additional description of area under review.

Some SEIS topics addressed the growth in the primary and adjacent study areas as well as cumulative growth across the city limits and urban growth area such as air quality, transportation, and land capacity.

### Correction 2.

In response to comment, the first paragraph of Section 3.3.1 in the Draft SEIS is modified as follows:

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

### Correction 3.

In response to comment, the last paragraph under *Applicable Regulations and Commitments* in Section 3.3 of the Draft SEIS shall be modified as follows:

The City will condition future development on the golf course site to meet the zero rise standard.

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## 3.0 RESPONSES TO COMMENTS ON THE DRAFT SEIS

### 3.1 Introduction

This chapter of the Final Supplemental Environmental Impact Statement (Final SEIS) contains the written and verbal comments provided on the Draft Supplemental Environmental Impact Statement (Draft SEIS) during the comment period that extended from May 15 to June 16, 2014. Written comments during the 30-day comment period and verbal comments received at the Planning Commission hearing held on June 5, 2014 are included. Responses to these comments are also included in this chapter.

### 3.2 Public Comment Letters

During the 30-day comment period, five comment letters were received. A list of the commenters is provided in Exhibit 3-1 with Tribes and agencies first followed by property owners and other public comment letters in alphabetical order by the commenter's last name. The numbered comment letters are included in Appendix A.

**Exhibit 3-1. Letters Received During Public Comment Period**

<b>Letter Number</b>	<b>Author</b>	<b>Date</b>
1	Muckleshoot Indian Tribe	16 June 2014
2	King County Water and Land Resources Division	16 June 2014
3	Washington Department of Ecology	16 June 2014
4	Reynolds Burton Attorneys	20 May 2014
5	Tarragon	16 June 2014

### 3.3 Responses to Comment Letters

Responses to letter comments are provided in Exhibit 3-2, below. As noted copies of the letters are provided in Appendix A; distinct comments are numbered in the margins with responses corresponding to the numbered comment. Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted and forwarded to the appropriate decision maker(s). Comments that ask questions, request clarifications or corrections, or are related to the Draft SEIS analysis are provided a response that explains the SEIS approach, offers corrections, or provides other appropriate replies.

## Exhibit 3-2. Draft SEIS Comment Reponses

Comment Number	Comment	Response
1-1	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.	Please see responses to the following comments which address issues specifically.
1-2	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.	This SEIS includes a programmatic review of potential impacts resulting from adoption of proposed Comprehensive Plan Docket alternatives in and around the Sumner Meadows Golf Course. It also assesses potential impacts that would result from continuing the current Comprehensive Plan and associated subarea and functional plans in the No Action Alternative (e.g. transportation improvement projects, Shoreline Master Program (SMP)). All of the action alternatives would have to be implemented consistent with existing policies and regulations, including compliance with the City's Critical Areas Ordinance and SMP. In addition, the City proposes protection measures beyond code compliance including retention of ownership of at least 200 feet of shoreline along the White River and more land south of the Tailrace. This retained land, some of which was cleared and used as golf course, would remain largely undeveloped and serve as riparian habitat. The City has also developed a conceptual flooding mitigation plan addressing the programmatic land use alternatives and City transportation improvement program improvements. If proposed mitigation is enacted, no significant unavoidable adverse impacts are anticipated.
1-3	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.	The City has surplusd the golf course site as of fall 2013. The proposal studied in the SEIS involves a Comprehensive Plan Docket to amend the Comprehensive Plan land use map and policies and make minor adjustments to zoning where commercial mixed use is presently allowed. As described in Chapter 2 of the Draft SEIS, the underlying zoning today is predominantly for light industrial uses.  Thus alternatives analyzed in the SEIS were analyzed programmaticly as potential policy and plan actions including their ability to meet the project objectives listed in section 1.3 and section 2.4.1 of the Draft SEIS. The objectives include those relevant to a comprehensive plan docket application, and address reinforcing the City's role as a

Comment Number	Comment	Response
		<p>regional manufacturing and industrial center serving south King County and east Pierce County, protecting critical areas, and reducing or minimizing flooding impacts.</p> <p>Project objectives do not include changing the golf course to a habitat mitigation or restoration site in whole. However, the No Action alternative does serve to address an alternative that retains the property in its current status. Action alternatives retain 200 feet or more of White River shoreline, which would remain undeveloped and serve as riparian habitat.</p> <p>Additionally, the flood model assumption and proposed mitigation for all of the alternatives within the SEIS offer a zero rise future condition for the floodplain and floodway; this is a greater standard than the current City flood hazard regulations require.</p> <p>Further, the City Staff Recommendation is to select Alternative 2 as documented in Appendix B (staff report to Planning Commission). That would result in the City’s retention of the AG zoned property as well as the public area along the White River.</p> <p>The referenced 2011 24th Street East Setback Levee Feasibility Study, prepared by Parametrix, looked at the feasibility of several options to provide flood control and/or habitat benefits on the White River in the area near 24th Street East. Retention of 200 feet of land along the White River as well as the AG land south of the tailrace would still provide enough land to allow the City to implement flood control and/or habitat improvement projects similar to those studied in the 2011 report that would achieve the objectives for flood control and habitat improvement outlined in that study.</p> <p>The projects described in the 2011 report, or similar projects would be implemented as required mitigation for public or private development. The City would determine the extent of required mitigation through its project-specific review and permitting process.</p> <p>It should also be noted that natural gas, electrical and wastewater rights-of-way are owned through the city-owned property, and restoration or mitigation projects would have to be planned to accommodate use of these corridors. Mitigation and/or restoration projects would also have to be planned in coordination with the planned 24<sup>th</sup> Street Bridge project.</p>

Comment Number	Comment	Response
1-4	Additional levee setback projects are needed as we have suggested which may be precluded by all of the action all alternatives.	Refer to Responses to 1-2 and 1-3.
1-5	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.	<p>The City acknowledges that the 2009 water system plan identified a potential shortfall in 2029 maximum daily demand. However, the 2009 plan continues on to state that "through a series of planned source improvements, new interties, new source construction and water right transfers, the shortfall would be filled a surplus created." According to the analysis of water usage for each alternative, summarized in section Draft SEIS Section 3.10.2, the anticipated increase in water demand under each of the alternatives would fall within the 20-year estimated maximum-day capacity anticipated in the Water System Plan. Because no long-term shortfall was identified, no additional mitigation measures were proposed.</p> <p>Additionally, when in operation, the golf course was not a water neutral use. Although not connected to the municipal water source, irrigation of the golf course pumped water from the river and the constructed ponds. Data provided by the City indicated that, in 2011 and 2012, approximately 40 million gallons of water was used for irrigation and other uses. As shown in section 3.10.2, daily water usage within the study site properties for each of the alternatives was between 11,136 (Alternative 4) and 219,018 (Alternative 3). When multiplied by the average number of work day per year, annual water usage is estimated between 2.9 million gallons and 57 million gallons annually. Alternatives 1 and 2 have estimated annual water usages of 34 and 36 million gallons respectively. According to this analysis, the study area, if built out as allowed under Alternative 1, 2 and 4 would use less water than the golf course.</p>
1-6	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.	<p>Refer to responses 1-1 to 1-5. In summary, the Action Alternatives:</p> <ul style="list-style-type: none"> <li>• Are studied with a higher standard of zero rise than exists in code to help the City understand how future development can avoid and minimize impacts;</li> <li>• Proposed conceptual flood mitigation demonstrates at a programmatic level that mitigation for flood impacts is feasible;</li> <li>• The City intends to retain public ownership of lands within a minimum of 200 feet of the river to protect habitat;</li> </ul>

Comment Number	Comment	Response
		<ul style="list-style-type: none"> <li>• Retention of the 200 foot shoreline area plus the AG zoned property will still allow the City to accomplish the flood protection and habitat objectives of the City’s prior (2011) commissioned study on habitat and flood restoration concepts; and</li> <li>• The City has a strategy to address its long-term water supply needs</li> </ul>
1-7	<p>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.</p>	<p>Draft SEIS Section 2.3.1 describes the study area in general. However, each of the alternatives includes potential actions (Comprehensive Plan land use designation and zoning district changes) on different properties. The SEIS includes a study area map (Exhibit 2-1) that details the full study area and notes how they are identified throughout the document. Section 2.4.1 notes which properties are included in each alternative. The Alternatives vary in where land use designations or zoning would change, but the entire area is included in the SEIS analyses.</p> <p>Alternative 4 would change the land use designation on the AG property south of 24<sup>th</sup> Street, but leave the golf course at current conditions. As noted in Section 2.4.2 and Appendix C of the Draft SEIS, this alternative was included as an offsite alternative in compliance with SEPA requirements WAC 197-11-440. In all other alternatives this property is assumed to remain in its existing conditions and is factored into the analyses of impacts as necessary to capture city-wide effects.</p> <p>The study area in the fact sheet is updated in the Final SEIS to address the complexity of the study area that was identified in Draft SEIS Section 2.3.1.</p>
1-8	<p>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 difficult to review the environmental effects of the proposed action alternatives with a study area that changes by alternative.</p>	<p>A scoping comment requested additional land use alternatives; see Draft SEIS Appendix A.</p> <p>As noted in response to 1-7, these properties are included in the overall Study Area and shown in Exhibit 2-1 of the Draft SEIS. The Alternatives vary in where land use designations or zoning would change, but the entire area is included in the SEIS analyses. Also, as a programmatic review of Docket proposals, the SEIS takes a broader view and looks at citywide effects from each alternative where necessary (e.g. air quality, transportation, and growth capacity in the analysis of plans and policies).</p>

Comment Number	Comment	Response
1-9	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.	The proposed 24th Street Bridge Project is currently undergoing City review. It is a project in the City’s Transportation Improvement Program (TIP) and Transportation Master Plan and thus is part of the No Action Alternative as well as the Action Alternatives.  Other permitted fills that are included in the flood model are summarized in Chapter 3 of the Draft SEIS (Section 3.3) and are shown along with their permitted average elevations in the attached Exhibit 3-3.
1-10	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).	Refer to response 1-8.
1-11	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.	Nothing has been proposed as part of this Comprehensive Plan Docket proposal that would violate the Corps permit. No modifications to the Corps permit would occur without direct discussion with the Corps. The City is retaining ownership of the area along Stewart Creek, and the buffers approved as part of the Corps agreement would remain intact.
1-12	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.	A project completed in 2011 replaced the 2-foot corrugated metal pipe with a 12-foot fish passable box culvert.

Comment Number	Comment	Response
1-13	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.	See Response to Comment 1-11. The 75 foot buffer on Stewart Creek is consistent with the Corps agreement. The City's election to retain an additional 25 feet in public ownership creates a buffer that is effectively the maximum buffer required under the City's code
1-14	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.	Refer to response 1-9. Exhibit 3-3 shows permitted floodplain fills that were included in the City's model.
1-15	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.	<p>West Consultants compared the White River channel cross sections in the Pierce County model (surveyed by USACE in 2002) versus the regional model that West Consultants developed (surveyed by the County in 2012). Below are the results of this ten year time window comparison.</p> <p>There was no aggradation at the Bridge Street Bridge location.</p> <p>At 24th Street, there was no definitive evidence of aggradation. The cross sections were slightly different and there were spot locations where the 2012 elevations were slightly higher (one foot or less). However, this appears to be within the margin of error of the comparison since it is possible that the sections were not surveyed at the exact same locations, along the exact same lines, etc.</p>

Comment Number	Comment	Response
		<p>At Stewart Road, both models contained a surveyed section at the downstream face of the Stewart Road Bridge. At this section the thalweg elevation is approximately 3 feet higher in the 2012 survey compared to the 2002 survey. Additionally, the elevations are higher along most of the channel bottom, not just in the thalweg.</p> <p>The comparison is for the period between 2002 and 2012. It is possible there was deposition prior to 2002 and there may be after 2012. As noted in Section 3.3.4, “The potential impacts and conceptual mitigation [in] this chapter are based on a stated set of assumptions. If those assumptions were to change, impacts and mitigation would need to be remodeled to meet City requirements.” Should conditions or additional information result in a need for additional analysis the City can conduct additional studies or require projects to provide additional analysis.</p> <p>The City acknowledges that aggradation is a long-term and ongoing concern for areas within the White River floodplain. It is also recognized that this concern is not uncommon in a developed floodplain in Western Washington. In the White River basin, the source of sediment is the Army Corps of Engineers Mud Mountain Dam and above. Sediment is transported by the river, within the channel, from that location.</p> <p>The information provided by West (above) and the analysis produced for this SEIS suggests that most of the aggregation is occurring above the 24th street Bridge and above the study area. There is no indication that adoption of any of the Docket alternatives would directly result in accelerated aggradation in the White River. Also, because the Docket alternatives would affect lands below the intense aggradation zone, the City-owned golf course property does not offer a cost effective solution to the long term problems associated with aggradation.</p> <p>The City continues to acknowledge that other planned activities may affect and be affected by aggradation. As part of the City’s planning responsibilities, flood risk monitoring will occur on a continuing basis. Specific development proposals will be subject to project-specific mitigation requirements. Also, the City may consider strategies in the longer term to address the effects of aggradation that could include:</p> <ul style="list-style-type: none"> <li>• Gravel harvesting above the ordinary high water mark;</li> <li>• Raising or constructing new levee; or</li> <li>• Widening the river channel.</li> </ul>

Comment Number	Comment	Response
1-16	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 ( <a href="http://wa.water.usgs.gov/">http://wa.water.usgs.gov/</a> ))	<p>Thank you for your comments regarding the differences between the 1D model uses and other 2D models. As a programmatic SEIS, this analysis is meant to look broadly at potential flood impacts that could occur within a 20 year planning horizon. We believe that the 1D model provides a conservative assessment suitable for this purpose. As subsequent specific developments are proposed, project-specific analyses will have to be prepared and appropriate modeling techniques would have to be determined for that level of analysis.</p> <p>Additionally, the City and its consultant addressed many of the concerns regarding modeling techniques in a letter to King County dated May 5<sup>th</sup> 2014 (See Appendix C).</p> <p>See also response to Comment 1-15.</p>
1-17	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.	The 1987 FEMA FIRMs are out of date. Developments since 1987 appear to have modified the extent of the floodplain. The hydrologic model and 100-year flood plain used for the flood analysis in this Draft SEIS was deemed to be appropriate for current conditions and scope of analysis for this programmatic document. The model developed by the City has included updated topography and permitted fills in order to develop a more accurate picture of the flooding, levels and patterns within the study area. The conceptual mitigation plan in the Draft SEIS would contain the 100 year flood within the corridor that at least doubles the flow capacity of current river channel based on current stream bed levels.
1-18	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.	Refer to response 1-15 and 1-16.
1-19	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	Refer to response 1-2 regarding compliance with the City's Critical Areas regulations and SMP provisions for salmon and other wildlife habitat protection. Project-level analyses will be completed for project as development proposals are submitted.

Comment Number	Comment	Response
	<p>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.</p>	<p>Also see response to comment 1-3 indicating the objectives from the 2011 Parametrix study are still viable with the City's retention of land along the White River, at the Tailrace and its retention of the AG property south of the tailrace.</p>
<p>1-20</p>	<p>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.</p>	<p>Comment noted. The City has proposed just that. Section 3.3.3 states that "The City may also propose a Comprehensive Plan policy amendment, as part of its 2015 update that would require future development to achieve zero surface water elevation through proposal design or mitigation." Further, the City has committed to condition future development on the golf course site to meet the zero rise standard. See Final SEIS Chapter 2 and the updated mitigation measures in Final SEIS Chapter 1.</p>
<p>1-21</p>	<p>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.</p>	<p>See response to comment 1-20.</p>
<p>1-22</p>	<p>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</p>	<p>As noted above, this is a programmatic SEPA review that includes a broad analysis of potential effects from adoption of one of the proposed Docket alternatives. It does not review any one project specifically; rather it reviews potential impacts of actions that could be taken under the alternatives combined with other known and planned City actions.</p> <p>The 24<sup>th</sup> Street bridge is in the City's Transportation Improvement Plan (TIP) and therefore is assumed, along with other projects, in each of the alternatives.</p> <p>The conceptual mitigation plan proposed in Chapter 3 was prepared in response to potential flooding impacts of all known projects in the area and demonstrates,</p>

Comment Number	Comment	Response
	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.	conceptually, how, over the long-term, those impacts can be mitigated.  Project-specific proposals will have to be analyzed on a case-by-case basis and specific mitigation measures will be required for identified project impacts at that stage.
1-23	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.	This statement is clarified in Final SEIS Chapter 2. The statement should have read: The Study Area is located on the east side of the White (Stuck) River, approximately 3.5 mile upstream of its confluence with the Puyallup River. Floods on the lower White (Stuck) River, in Pierce County, are controlled upstream by the Army Corps of Engineers' Mud Mountain Dam. When possible, Mud Mountain is regulated to store White (Stuck) River flows if flows in the Puyallup River exceed about 20,000 cubic feet per second (cfs) or if there are very large flows in the White (Stuck) River above the dam. There have been historical instances when very large flow peaks in the Puyallup and White Rivers have not been coincident near their confluence. The effect of flood control on the White (Stuck) River is to reduce the 10%-annual-chance flood event to 14,000 cfs, the 2% event to 15,300 cfs, and the 1% event to about 15,500 cfs in the lower White (Stuck) River.
1-24	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.	See response to comment 1-3. Also, any development permitted on the Sumner Meadows Golf Course property would be required to comply with the City's SMP buffer provisions which vary from 100 to 200 feet in the Study Area. However, the City is retaining a minimum of 200 feet in public ownership along the River. No specific trail proposal has been submitted. If a development proposal were found to result in an impact to the buffer, mitigation to achieve no net loss of shoreline function would be required.

Comment Number	Comment	Response
1-25	The FSEIS should also discuss why the City is pursuing these action alternatives if there is currently excess employment capacity (see page 2-8).	Population and employment targets are meant as minimums cities should strive to accommodate. The City may seek to accommodate additional employment to satisfy other planning and community development goals. The City of Sumner has a goal, stated as an objective in this SEIS, to maintain its role as a manufacturing and industrial center in King and Pierce Counties including a goal of 20,000 employees in the manufacturing/Industrial Center.
1-26	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.	Appendix C of the Draft SEIS explains the purpose of Alternative 4 (the Off-site Alternative). Also, the Draft SEIS addresses agricultural conversion in Section 3.6.2 under the discussion of Agricultural Countywide Planning Policies on Page 3-65.
1-27	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.	Project-specific review would require mitigation consistent with City codes which adopt and implement the most current Department of Ecology Stormwater Manual.
1-28	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.	Programmatic analyses associated with land use docket proposals do not require a jurisdictional determination from the Corps. Corps consultation would be required for project specific proposal review.

Comment Number	Comment	Response
1-29	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.	Refer to responses 1-2, 1-3, 1-15, 1-16, and 1-24.
2-1	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 ID hydraulic model cannot reliably predict County line Project effects, and we believe that the deficiencies that we identified in the KC findings continue to be replicated in the Draft SEIS.	Please see the response in 1-16 and the letter to King County dated May 5th 2014 (Appendix C).
2-2	As often discussed with City representatives, the County line 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 design has been developed with very thorough and detailed analyses, including two dimensional (2D) hydraulic modeling and sediment transport analyses to	<p>The City's current flood code is consistent with FEMA floodplain regulations. However, it currently allows for a one foot rise in the 100-year floodplain. As a result, downstream flood potential within the City has increased over time.</p> <p>In recognition of this, the City established a flood model assumption for a zero rise, and has included as a potential mitigation measure establishing a zero rise standard in its 2015 Comprehensive Plan update. Further the City has committed to condition future development of the golf course to the zero rise standard.</p>

Comment Number	Comment	Response
	<p>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 County line 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 County line 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.</p>	<p>The City also acknowledges the benefits of the County line project to large areas of the City. The developed areas south of the levee project and east of the White River would see measurable flood reduction of up to 0.8 feet in some areas. However areas adjacent to the eastern shoreline of the river would see some increase in flooding levels. The City also recognizes that the long term result of currently planned projects along with potential new development of the golf course and associated mitigation would provide an overall improvement in habitat and flood conditions. But, in the interim, localized flooding impacts may occur depending on the sequence of project development. The City is working with King County to identify funding sources for mitigation where funding gaps occur.</p>
2-3	<p>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.</p>	<p>Refer to responses in 1-15 and 1-16.</p>
2-4	<p>As we have previously informed the city, the risk of a river channel avulsion along 142<sup>nd</sup> 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 County line 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</p>	<p>Refer to response 1-15 addressing aggradation analysis. Avulsion of the River at 142<sup>nd</sup> Avenue East will be prohibited by the construction of King County's County Line levee project. The project, as designed, will extend a levee to Stewart Road effectively cutting off the overflow path along 142<sup>nd</sup> Avenue East. The Draft SEIS assumes the levee project will be completed as proposed.</p>

Comment Number	Comment	Response
	related to sediment deposition should be considered for each of the project alternatives proposed in the Draft SEIS.	
2-5	Use of the 1D model results inaccurately estimates the impacts of the Countyline Project.	Refer to response 1-16. The City's 1D model is strictly used for determining the amount of overflow for a given river condition. A 2D model determines both over bankflow and flow path in the overbank area. For the purposes of this programmatic analysis, the 1D model predicts the overbank conditions within the margin of error as demonstrated by the letter to King County dated May 5 <sup>th</sup> 2014 prepared by the City and its consultant to address many of the concerns regarding modeling techniques (See Appendix C).
2-6	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.	<p>Refer to response 1-22. As a programmatic SEPA review, this analysis encompasses known and planned projects. The Countyline Project has been included in King County's plans has completed SEPA review. As described on the King County website describing their projects in this reach are consistent with numerous County adopted plans:</p> <p><i>The Countyline and Right Bank projects are identified in and consistent with the primary objectives of the adopted <u>2006 King County Flood Hazard Management Plan</u> and the <u>2013 King County Flood Hazard Management Plan: Update and Progress Report</u>, as well as the <u>Salmon Habitat Protection and Restoration Strategy for the Puyallup and Chambers/Clover Creek Watersheds</u> (external link, PDF 869KB) - Water Resource Inventory Area 10 and 12.</i></p> <p><i>(<a href="http://www.kingcounty.gov/environment/wlr/sections-programs/river-floodplain-section/capital-projects/lower-white-river.aspx">http://www.kingcounty.gov/environment/wlr/sections-programs/river-floodplain-section/capital-projects/lower-white-river.aspx</a>)</i></p> <p>The purpose of this analysis is to broadly assess potential impacts during a 20 year planning period. The Countyline project is anticipated to be constructed during that time and therefore is assumed for all alternatives.</p>

Comment Number	Comment	Response
2-7	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.	Comment noted. The City appreciates the collaborative efforts King County has made and hopes to continue working effectively together.
2-8	We respectfully request that the Draft SEIS be revised to correct information that is technically and procedurally incorrect.	See preceding responses, particularly Response 2-5.
2-9	As a neighboring jurisdiction and an adjacent landowner to the 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.	The City provided notice to nearby property owners, agencies and through the newspaper. We appreciate that King County responded to the Draft SEIS during the comment period. King County is included in the Final SEIS distribution list.
3-1	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.	As noted above in response 1-2, this is a programmatic SEPA review of potential impacts from adoption of one of the proposed Docket alternatives. It does not review a specific proposal. Specific development proposals will be reviewed on a project-by-project basis as specific development proposals are submitted.

Comment Number	Comment	Response
3-2	<p>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.</p>	<p>The model has been completed and reported in the Draft SEIS. Refer to response 2-6.</p>
3-3	<p>Likewise the flood channel and bridge flood rise analysis will need to be included for the cumulative impacts analysis.</p>	<p>The programmatic analysis assumes cumulative floodplain development and the inclusion of programmed projects such as the Countyline project and the City's 24<sup>th</sup> Street Bridge.</p>
3-4	<p>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.</p>	<p>The Draft SEIS addresses the potential effects of modifying land use in the study area and identifies potential mitigation measures to reduce impacts. The City would implement its long-range land use, flood hazard mitigation, and other capital projects based on the availability of funds and applying conditions to future development to ensure compliance with the City's code. The City's capital facilities plans will be updated periodically to reflect City priorities and will be consistent with its Comprehensive Plan.</p> <p>As noted above, development of the golf course, retention of the 200 feet of shoreline and accompanying mitigation, other developments noted in the Draft SEIS, as well as the King County Countyline Levee Setback project and the 24th Street Bridge improvement and their accompanying mitigation, would improve flood and habitat conditions in the study area by the 20-year planning horizon of the City's Comprehensive Plan.</p> <p>In the interim, localized flooding may occur depending on the sequence that these projects are constructed. However, those impacts would not be a direct result of the proposed land use changes in the Action Alternatives. Further, the City is committed to developing a program of projects that will contain the 100-year flood within a defined floodplain enhanced with habitat features to a level necessary for the recovery of listed species. Sale of the golf course property, as authorized by the City Council, would provide the City with resources to fund these types of projects that would mitigate for potential localized interim impacts.</p>

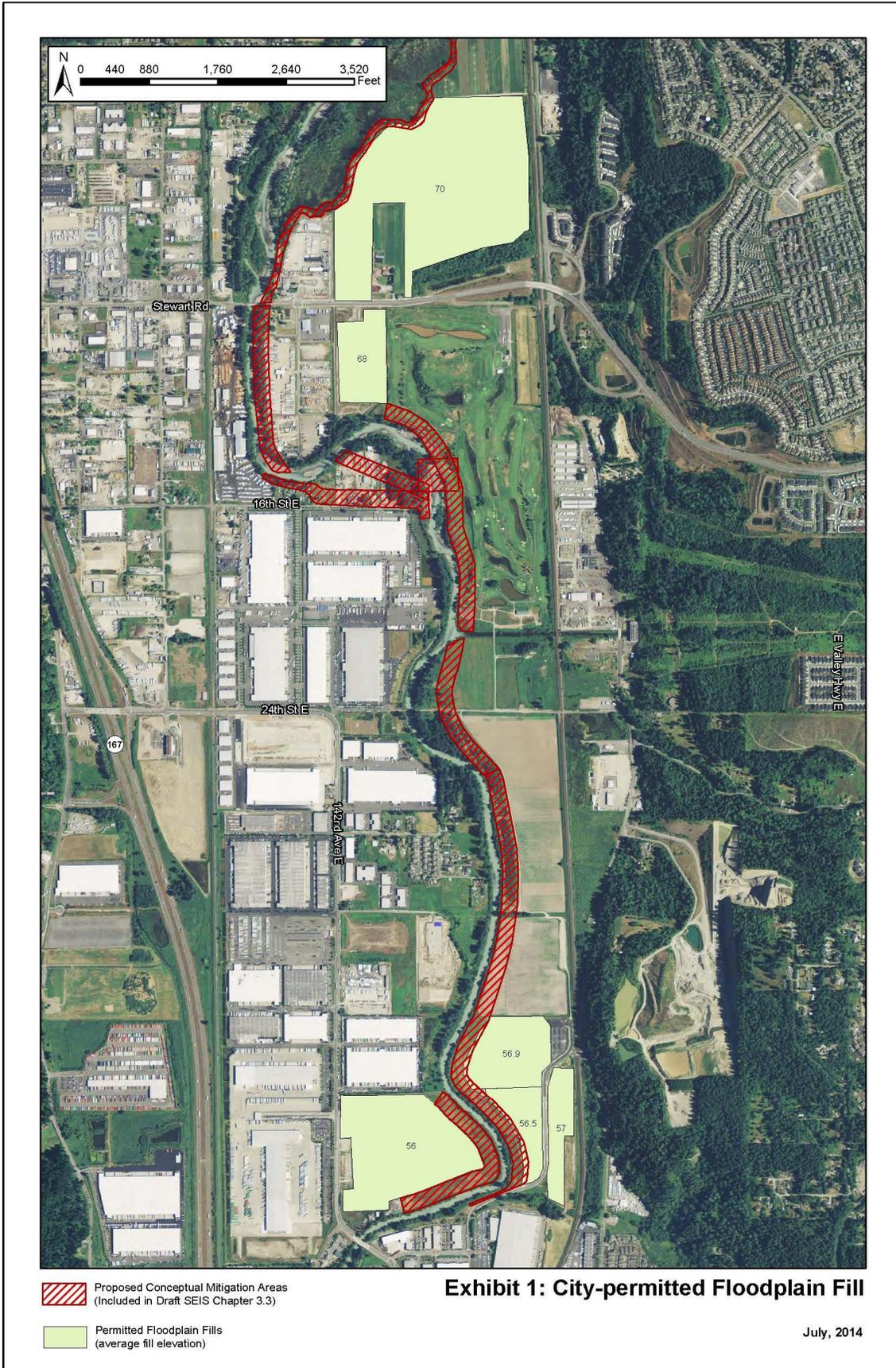
SUMNER MEADOWS DOCKET FINAL SEIS | RESPONSES TO COMMENTS

Comment Number	Comment	Response
3-5	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.	The comment is noted and forwarded to the appropriate decision makers.
4-1	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.	Conditions east of East Valley Highway including access to infrastructure and the use of adjacent properties differ and would require separate review. The appropriate zoning of the referenced property would require consideration in its own Docket request; please contact the Contact Person on the Fact Sheet for additional information on the City’s docket process, which is also available by reviewing the City’s Municipal Code.
4-2	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.	Please see Response to Comment 4-1.
5-1	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	Please see Response to Comment 4-1.

Comment Number	Comment	Response
	golf course proposal will impose upon neighboring properties.	
5-2	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.	The comment is noted and forwarded to the appropriate decision makers.
5-3	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	The comment is noted and forwarded to the appropriate decision makers.
5-4	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.	The comment is noted and forwarded to the appropriate decision makers.
5-5	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 properties would likely never be developed. This would negatively impact the	The comment is noted and forwarded to the appropriate decision makers.

Comment Number	Comment	Response
	<p>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.</p>	
5-6	<p>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.</p>	<p>The comment is noted and forwarded to the appropriate decision makers.</p>
5-7	<p>We encourage the City to establish a long-term and consistent land use pattern along Stewart Road.</p>	<p>The comment is noted and forwarded to the appropriate decision makers.</p>
5-8	<p>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.</p>	<p>The comment is noted and forwarded to the appropriate decision makers.</p>

Exhibit 3-3. City-permitted Floodplain Fill



### 3.4 Public Hearing Comments

Exhibit 3-4 summarizes verbal comments at the June 5, 2014 Public Hearing, and provides responses. One commenter spoke at the formal public hearing. Another commenter spoke at the Planning Commission’s general public comment portion of the agenda rather than the public hearing. As the comment was made during the comment period, it is included in this table.

**Exhibit 3-4. Public Hearing Comments and Responses**

Comment Number	Response
<b>Public Hearing 1: Kristen Link, Tarragon Developers</b>	
Comment	<p>They are the developers of most of the other properties. They are representing both; 6 Kilns if it is industrial; and Greenwater if it is M-1.</p> <p>They support the City, and are glad alternatives 2 and 3 have been identified. Along with the rezoning for the golf course, they also like the idea of more sustainable industrial development. They would love to help with that.</p> <p>With things changing with the golf course there has been a big change in what could go in there. All industrial seems to make a lot of sense. They will send in a letter by June 16th as to where they stand. They like option 2 and 3, and would like to make sure it is the right decision.</p>
Response	The comment is noted and forwarded to the appropriate decision makers.
<b>Public Hearing 2: Linda Burgess, Puyallup River Watershed Council</b>	
Comment	<p>She is a board member of the Puyallup River Watershed Council and a member of the Pierce County Biodiversity Alliance. She is here today because she knows that the Planning Commission will be making recommendations on the Comprehensive Plan Amendments that affect our watershed and in particular the area adjacent to the Lower White River. The two organizations she mentioned are currently working on projects concerning the lower White River and there is information that she would like the Planning Commission to be aware of that will be relevant to deliberations.</p> <p>Very briefly, PRWC-</p> <ul style="list-style-type: none"> <li>• The Puyallup River Watershed Council is stakeholder group of citizens, state and local officials, non-profit, businesses, educators, that share information and identify opportunities to work together to preserve the health of the Puyallup River Watershed</li> <li>• The Puyallup River Watershed encompasses an area of just over 1000 sq miles from Mt Rainier to Puget Sound. Its official name is the Puyallup - White River Watershed named after the 2 major river systems in the watershed</li> <li>• Your city is in the Puyallup River watershed and the city of Sumner is a member of the watershed Council</li> <li>• One of the Watershed Council's high priority projects concerns the fact that the White River is the home of 4 species of salmon (Chinook,coho, chum &amp; pink) as well as steelhead and bull trout and that it has been recently ranked as the 8th most endangered river in the county.</li> </ul> <p>PCBA –</p> <ul style="list-style-type: none"> <li>• The Mission of the Alliance is to:             <ol style="list-style-type: none"> <li>1. Identify and map highest quality habitats in Pierce County supporting biological diversity;</li> </ol> </li> </ul>

Comment Number	Response
2.	Predict and then verify what species are present;
3.	Engage community members & jurisdictions to understand the benefits of biodiversity and why it is a good thing for us humans; and
4.	Offer expertise to assist communities in understanding options to preserve and enhance these habitats and in creating a community generated stewardship plan to accomplish this;
	<ul style="list-style-type: none"> <li>• The Alliance identified 16 biorich areas in Pierce County that meet this designation 6 of which are in our watershed</li> </ul>
	<ul style="list-style-type: none"> <li>• The biodiversity area that the Alliance is currently working on is the Lower White River biodiversity management area which encompasses the area adjacent to the White River that starts in Buckley (connecting through the cities of Auburn &amp; Pacific) and ending in Sumner.</li> </ul>
	<ul style="list-style-type: none"> <li>• The effectiveness of the Lower White River BMA to continue to support these high levels of biodiversity depends on the actions taken by each of these communities and Sumner shares in this critical responsibility.</li> </ul>
	<p>In conclusion, she is requesting that in the Planning Commission’s deliberations in making recommendations on Comprehensive Plan Amendments concerning land use &amp; regulations in the area adjacent to the White River they consider the following:</p>
	<ol style="list-style-type: none"> <li>1. Providing adequate protection of the health of the White River not only as a salmon, steelhead, and bull trout bearing river but also as a critical element in preserving biodiversity in general.</li> </ol>
	<ol style="list-style-type: none"> <li>2. Protecting native habitat especially within the designated boundaries of the Lower White River biodiversity management areas and considering the areas adjacent as a protective buffers.</li> </ol>
	<ol style="list-style-type: none"> <li>3. Minimizing flooding potential that can be exacerbated by inappropriate development and recognizing the importance of using the most current FEMA flood maps in determining setbacks.</li> </ol>
	<p>She would also request the Planning Commission consider highlighting in their Comprehensive Plan the Lower White River biodiversity management area as a special place within the city of Sumner that should be especially valued by its citizens.</p>
Response	<p>The comments are noted. The 2004 Pierce County Biodiversity Network Assessment is considered an “Other Comprehensive Planning Documents” in Pierce County Code Title 19D. The lower White River is considered a biodiversity management area, including the river corridor from the county line to the tailrace. For this area, a Lower White River Biodiversity Management Area (BMA) Stewardship Plan was prepared in December 2009; the document has not been incorporated into the County’s Comprehensive Plan and omitted some chapters that were in preparation.</p>
	<p>Specific strategies for Sumner reaches were not included in the 2009 plan. A draft Sumner “chapter” appears in Appendix E though not yet part of the 2009 plan. General strategies in the 2009 document applicable to Sumner included (lettered for purposes of this analysis only):</p>
	<ol style="list-style-type: none"> <li>A. Work with the Counties, Cities of Buckley, Auburn, Pacific, and Sumner, and State Agencies to promote the use of LID [low impact development] on public properties.</li> </ol>
	<ol style="list-style-type: none"> <li>B. Work with the cities of Buckley, Auburn, Pacific, Sumner and the Cascade Land Conservancy to promote purchase or transfer of development rights for high priority open space properties within the BMA.</li> </ol>

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**Comment    Response**  
**Number**

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- C. Work with King and Pierce County, Cities of Buckley, Auburn, Pacific, and Sumner, PCCD and homeowners to replace existing culverts that are causing fish blockages.
- D. Work with the cities of Buckley, Auburn, Pacific, and Sumner, and developers to help identify the best locations for designated open space areas during the development proposal review process. Try and come up with a “win-win” solution (i.e. utilizing density bonus for open space and where best to locate open space areas in relation to the BMA).
- E. FLWR [Friends of the Lower White River], Puyallup River Watershed Council, and city Parks Departments from Buckley, Auburn, Pacific, and Sumner should also continue to promote property owner participation in the WDFW-BWH [Washington Department of Fish and Wildlife Backyard Wildlife Habitat] program.

Strategy A Response: The City of Sumner has adopted the latest Ecology stormwater manual that requires the use of low impact development techniques. This would apply to the SEIS study area and citywide.

Strategy B Response: The City proposes to retain public ownership of land within 200 feet of the White River as well as the AG zoned property to the south.

Strategy C and D Response: See responses to the Muckleshoot Indian Tribe about a recent culvert replacement to promote fish passage in the SEIS study area (response 1-12)

Strategy E Response: The program appears to be targeting residential owners. Note that the City has adopted its SMP that promotes habitat restoration along the river.

Please also note that the City will be updating its Comprehensive Plan by mid-2015 and it is appropriate that the City consider biodiversity planning efforts in that process as well. The commenter is encouraged to participate in that process. See [www.ci.sumner.wa.us](http://www.ci.sumner.wa.us) for more information on the Comprehensive Plan Update.

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## 4.0 REFERENCES

The following references are cited in the Final SEIS.

City of Sumner. 2012. *City of Sumner Comprehensive Plan*. City of Sumner, Washington.

City of Sumner. 2012. *Draft Sumner Shoreline Master Program Update*. Prepared by ESA Adolfson. Seattle WA.

Sumner, City of. 2010. *Final Environmental Impact Statement, City of Sumner Comprehensive Plan Update and Amendments*. City of Sumner, Washington. November.

City of Sumner. 2011. *Fleishmann 's Industrial Park LLC Docket Application - Draft Supplemental Environmental Impact Statement*. Prepared by ICF International and BERK. November 2011.

City of Sumner. 2014. *Sumner Municipal Code*. Code Publishing. Seattle, WA.

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## 5.0 DISTRIBUTION LIST

The notice of availability for this Final Supplemental Environmental Impact Statement (SEIS) was provided to the following agencies and individuals. Agencies indicated with an asterisk (\*) were provided with an electronic or paper copy of the Final SEIS.

### 5.1 Federal, State, Tribal, Regional, County and City Agencies

#### 5.1.1 Federal Agencies

Federal Emergency Management Agency

National Marine Fisheries Services, Habitat Division

U.S. Army Corps of Engineers, Seattle District

U.S. Environmental Protection Agency, Environmental Evaluation Branch

U.S. Department of Agriculture/National Resource Conservation Service

U.S. Fish and Wildlife

#### 5.1.2 State of Washington Agencies

\*Department of Archaeology & Historic Preservation

\*Department of Commerce

\*Department of Corrections

\*Department of Ecology

\*Department of Fish and Wildlife

\*Department of Health

\*Department of Natural Resources

\*Department of Social and Health Services

\*Department of Transportation

\*Parks and Recreation Commission

\*Puget Sound Partnership

\*Recreation and Conservation Office

#### 5.1.3 Tribal

\*Puyallup Tribe

\*Muckleshoot Tribe

#### 5.1.4 Regional

\*Puget Sound Regional Council

\*Puget Sound Clean Air Agency

### **5.1.5 Counties**

- \*King County Water and Land Resources Division
- \*Pierce County, Planning and Land Services
- Pierce County, Economic Development Board
- Pierce County, Office of the Assessor-Treasurer
- Tacoma-Pierce County Health Department

### **5.1.6 Cities**

- \*City of Auburn, Planning Department
- \*City of Bonney Lake, Planning Department
- \*City of Edgewood, Planning Department
- \*City of Fife, Planning Department
- \*City of Orting, Planning Department
- \*City of Pacific, Planning Department
- \*City of Puyallup, Planning Department
- City of Lacey, Planning Department

## **5.2 Special Districts, Transportation, and Utilities**

- Burlington North Santa Fe Railroad
- Cascade Water Alliance
- \*Dieringer School District
- \*East Pierce Fire and Rescue
- Pierce College
- \*Pierce Transit
- Puget Sound Energy
- Qwest
- \*Sumner School District
- Union Pacific Railroad Company
- Washington Utilities & Transportation Commission

## **5.3 City of Sumner**

- \*Finance (Capital Facilities)
- \*Parks and Recreation
- \*Police
- \*Public Works

\*Sumner City Council

\*Sumner Planning Commission

## **5.4 Boards and Associations**

Alderton-McMillin Community Planning Board

Puyallup River Watershed Council

Puyallup/Sumner Chamber of Commerce

Sumner Downtown Association

Master Builders Association

Lakeland Homeowner's

## **5.5 Community Organizations**

Cascade Land Conservancy

Futurewise

Audubon Society

Trout Unlimited

## **5.6 Newspapers**

Bonney Lake and Sumner Courier-Herald

Tacoma News Tribune

## **5.7 Citizens and Property Owners**

Property owners within 1,000 feet of the study area

Commenters on Draft SEIS (see Final SEIS Chapter 3.0).

Notices of the Final SEIS availability will also be placed on the City's website, posted at City Hall and the local library, published in at least one local newspaper (i.e., Tacoma News Tribune), and emailed to interested parties.

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