

DRAFT

City of Sumner

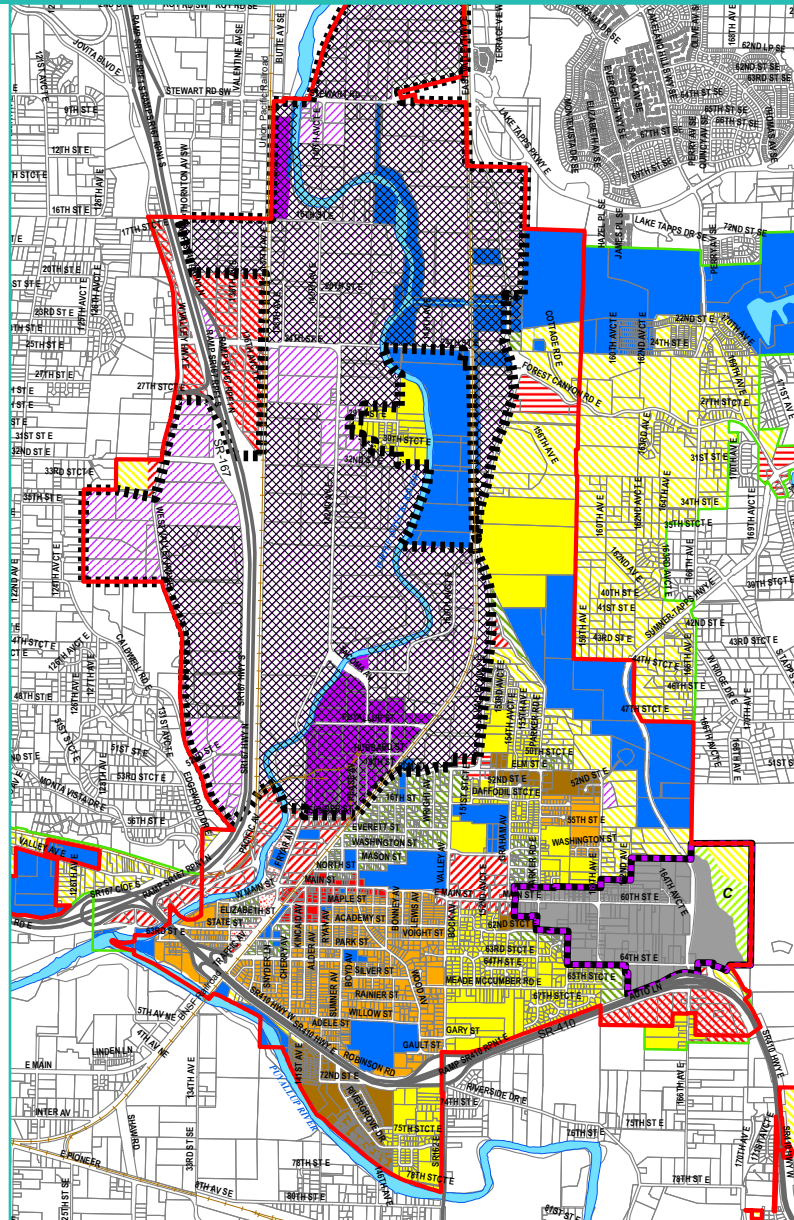
VOLUME II: SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

February 2015

Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Development Regulations and Critical Areas Ordinance Update, and East Sumner Neighborhood Planned Action



CITY OF
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1104 Maple Street, Sumner WA 98390

COMMUNITY DEVELOPMENT DEPARTMENT

253-299-5520

February 24, 2015

Subject: City of Sumner Draft Comprehensive Plan, East Sumner Neighborhood Plan, Municipal Code Update, Supplemental Environmental Impact Statement (Draft SEIS), Transportation Plan, Capital Facilities Plan, and East Sumner Neighborhood Planned Action

Dear Reader:

The City of Sumner has issued a Draft Supplemental Environmental Impact Statement (Draft SEIS) for the City of Sumner 2015 Comprehensive Plan Update, the East Sumner Neighborhood Plan, Transportation Plan, Capital Facilities Plan, and Municipal Code Update that address comprehensive plan policies, map amendments, and development regulations. The proposal also includes a planned action for the East Sumner Neighborhood in accordance with the provisions of the State Environmental Policy Act (SEPA).

The purpose of this Draft SEIS is to assist the public and City decision makers in considering future growth and land use patterns in the City with an emphasis on the East Sumner Neighborhood through the plan. Issues facing decision makers include consideration of map amendments to increase the supply of housing and employment capacity in the city, comprehensive plan policy amendments, and the scope of public improvements to support new growth. To assist with decision making, the City is addressing three alternatives in the Draft SEIS: Alternative 1 – No Action Alternative, Alternative 2 – Minimal Zoning Action, and Alternative 3 – Assertive Collaborative Action. For each alternative the Draft SEIS programmatically addresses: earth; flooding; plants and animals; water resources; air quality and greenhouse gases; land use; population, employment, and housing; relationship to plans and policies; public services, capital facilities and utilities; parks and recreation; and transportation.

The Draft SEIS for the 2015 Comprehensive Plan and associated documents supplements the Final EIS for the City of Sumner Comprehensive Plan Update and Amendments issued on November 24, 2010. **A public hearing is scheduled for 7PM on March 19, 2015 at Sumner City Hall, 1104 Maple Street, Sumner, WA 98390.**

Affected agencies, tribes, and members of the public are invited to comment on this Draft SEIS. Comments may be provided in writing. Written comments are due no later than **5:00 p.m., April 24, 2015** and should be directed to:

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City of Sumner
Community Development Department
1104 Maple Street, Suite 250
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See the City's web page, <http://www.ci.sumner.wa.us/>, for more information, including Planning Commission and City Council meetings related to the project.

Sincerely,

A handwritten signature in blue ink that reads "Paul Rogerson". The signature is fluid and cursive, with the first name "Paul" and last name "Rogerson" clearly distinguishable.

Paul Rogerson, Community Development Director and SEPA Responsible Official

FACT SHEET

Project Title

Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Development Regulations and Critical Areas Ordinance Update, and East Sumner Neighborhood Planned Action

Study Area and Location

The study area consists of the Sumner city limits and Sumner Urban Service Area portion of the Pierce County Urban Growth Area (UGA) boundary. The East Sumner Subarea Plan will be focused on the East Sumner Neighborhood approximately between Parker Road and Sumner Tapps Highway and from Salmon Creek on the north to SR 410 on the south.

Proposal and Alternatives

The City of Sumner will be updating its Comprehensive Plan and East Sumner Neighborhood Plan by June 30, 2015 in accordance with the Growth Management Act (GMA). The Update includes the following:

- Revise City Comprehensive Plan Elements and development regulations to address growth during the 2015-2035 planning period, land use plan and zoning changes to accommodate growth targets for population, housing and employment, transportation and capital facilities plans, and housekeeping and consistency amendments.
- Amendments and updates to comprehensive plan elements to ensure consistency with the City's review of its plans in light of state and regional plans, GMA requirements as well as community vision and needs.
- Update Critical Area, Subdivision, Zoning and Development Regulations for consistency with the Comprehensive Plan.
- Eliminate the Orton Junction and East Hill UGA modifications undertaken as part of the 2010 Comprehensive Plan Update.
- Update the East Sumner Neighborhood Plan with new zoning regulations, wetland mitigation proposals, road improvements, pedestrian and bicycle paths and other improvements. The actions increase land capacity and alter current transportation plan improvements.
- Consider application of SEPA tools to promote the vision of mixed use growth in East Sumner, such as a mixed use and residential infill exemption (RCW 43.21C.229), or a planned action (RCW 43.21C.440; WAC 197-11-164 to 172) where development that meets City codes and performance standards would have a streamlined SEPA process and rely on the EIS rather than require a new threshold determination. A draft planned action ordinance is provided for consideration by the City.

Alternative 1: No Action

For the purpose of this analysis, the No Action Alternative represents the continuation of the City's current Comprehensive Plan (adopted April 1994, updated June 2005, 2009 and 2014) and retention of the 2030 planning horizon and growth allocations.

The No Action alternative includes the following:

- Future Land Use consistent with 2010 No Action Future Land Use in the City Limits and Urban Service Area/Urban Service Area; and
- Sumner Meadows Golf Course Alternative 2 establishing M-1 zoning along Steward Road and Golf Course.

Alternative 2: Minimal Zoning Action

Alternative 2 Minimal Zoning Action includes the items in the No Action Alternative plus the following:

- Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue;
- Retain Medium Density Residential (MDR) along the East Valley Highway;
- Increase buildable land units in Town Center by 25% (net increase of 54 units above No Action) due to elimination of the condominium requirement for multi-family around the train station and changes to required parking in the Town Center to promote development; and
- East Sumner Neighborhood Plan: Minimal Action (Rezoning) Alternative;
 - Rezone properties to allow multi-family and mixed-use development along with planned improvements to Main Street.
 - A new Urban Village Designation would be applied along East Main Street.
 - General Commercial zoning would be applied along 64th Street.
 - Low Density Residential (LDR) is retained along Salmon Creek and north of East Main Street.
 - Implementation of SEPA tools to promote the vision of mixed use growth in East Sumner, such as a mixed use and residential infill exemption or a planned action as described under the Proposal.

Alternative 2 would revise City Comprehensive Plan Elements and development regulations consistent with the Growth Management Act (GMA) requirements as described for the Proposal.

Alternative 3: Assertive Collaborative Action

Alternative 1 plus following land use changes:

- Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue;
- Change in designation and zoning of Multi-family designated land to manufacturing (M-1) along the East Valley Highway; and
- Increase buildable land units in Town Center by 50% (net increase of 107 units above No Action) due to elimination of the condominium requirement for multi-family around the train station and changes to required parking in the Town Center to promote development; more demand and interest in Town Center development is predicted in this alternative compared to Alternative 2.
- East Sumner Neighborhood Plan: Assertive Collaborative Action;
 - Build 62nd St. E from 160th Ave E to Sumner Tapps Hwy with a major intersection there.
 - Build a new local street from 64th Street E to 60th Street East. Establish an off-site mitigation bank, likely at City AG zoned property.
 - Property owners will address stormwater issues on-site or collectively.

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- Rezone to encourage more intense commercial or mixed-use development south of the new 62nd St E and east of the YMCA.
- Improve Main Street, especially for pedestrians and cyclists.
- Establish a park along Salmon Creek
- Implement SEPA tools to promote the vision of mixed use growth in East Sumner, such as a mixed use and residential infill exemption or a planned action as described under the Proposal.

Alternative 3 would also revise City Comprehensive Plan Elements and development regulations consistent with the Growth Management Act (GMA) requirements as described for the Proposal.

Proponent

City of Sumner

Tentative Date of Implementation

June 30, 2015

Environmental Document Supplemented

The SEIS supplements the EIS prepared for the City of Sumner's 2010 Comprehensive Plan Update and Amendments, November 2010. The SEIS also considers other recent SEPA documents for Comprehensive Plan amendments.

Lead Agency

City of Sumner

Responsible Official

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Required 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 Washington State 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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Draft SEIS Date of Issuance

February 24, 2015

Draft SEIS Comment Due Date

April 24, 2015

Public Comment Opportunities

Affected agencies, tribes, and members of the public are invited to comment on this Draft EIS. Comments may be providing in writing. Written comments should be directed to the contact person below no later than **5:00 p.m., April 24, 2015**.

Public meetings are planned during the 60-day comment period. A public hearing will be held on March 19, 2015, at 7:00 p.m. at the City of Sumner, City Hall, 1104 Maple Street, Sumner, Washington, 98390. See the City of Sumner website for more information: <http://www.ci.sumner.wa.us/>.

Draft of Final Action

Anticipated City of Sumner action is June 2015. See Tentative Date of Implementation Above.

Location of Background Data

See Lead Agency and Responsible Official Address listed 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:

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- The *Final Environmental Impact Statement for City of Sumner Comprehensive Plan Update 2010* was issued on November 24, 2010, to address an update of the comprehensive plan to horizon year 2030.
 - The 2010 Final EIS is being supplemented by this *2015 Sumner Comprehensive Plan Update and related documents SEIS*.
- The Fleishmann's Industrial Park, LLC Manufacturing/Industrial Center (MIC) Overlay Expansion Final SEIS issued on February 29, 2012.
- The *City of Sumner 2013 Comprehensive Plan Annual Amendments Sumner Meadows Docket Final SEIS*, issued July 25, 2014.

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

Draft Supplemental Environmental Impact Statement Cost and Availability

The purchase price of a copy of the Draft SEIS is based on reproduction costs of printed documents or compact discs (CDs). Hard copies of the Draft EIS 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 Website, <http://ci.sumner.wa.us/>.

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Appendix B: Growth Targets and Capacity Analysis

Appendix C: Planned Action Ordinance (Draft)

Appendix D: Agricultural Land Analysis

1.0 SUMMARY

1.1 Purpose of the Proposal

The City of Sumner will be updating its Comprehensive Plan and East Sumner Neighborhood Plan by June 30, 2015 in accordance with the Growth Management Act (GMA). The Update includes the following:

- Revise City Comprehensive Plan Elements and development regulations to address growth during the 2015-2035 planning period, land use plan and zoning changes to accommodate growth targets for population, housing and employment, transportation and capital facilities plans, and housekeeping and consistency amendments.
- Amendments and updates to comprehensive plan elements to ensure consistency with the City's review of its plans in light of state and regional plans, GMA requirements as well as community vision and needs.
- Update Critical Area, Subdivision, Zoning and Development Regulations for consistency with the Comprehensive Plan.
- Eliminate the Orton Junction and East Hill UGA modifications undertaken as part of the 2010 Comprehensive Plan Update.
- Update the East Sumner Neighborhood Plan with new zoning regulations, wetland mitigation proposals, road improvements, pedestrian and bicycle paths and other improvements. The actions increase land capacity and alter current transportation plan improvements.
- Consider application of SEPA tools to promote the vision of mixed use growth in East Sumner, such as a mixed use and residential infill exemption (RCW 43.21C.229), or a planned action (RCW 43.21C.440; WAC 197-11-164 to 172) where development that meets City codes and performance standards would have a streamlined SEPA process and rely on the EIS rather than require a new threshold determination. A draft planned action ordinance is provided for consideration by the City.

1.2 State Environmental Policy Act Process

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

Purpose of the SEIS

The purpose of this Draft SEIS is to assist the public and local government decision makers in considering future growth and land use patterns as well as goals, policies, and development regulations as part of the Sumner Comprehensive Plan Update. These broad decisions will provide direction and support for more specific actions by the City, such as capital improvements and implementing regulations.

Programmatic and Integrated Analysis

This Draft SEIS provides a qualitative and quantitative analysis of environmental impacts as appropriate to the general nature of a comprehensive plan update. The adoption of comprehensive plans 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 single site-specific project and involves decisions on policies, plans, and programs. An EIS for a nonproject proposal does not require site-specific analyses; instead, the EIS discusses impacts and alternatives appropriate to the scope of the

nonproject proposal and to the level of planning for the proposal (Washington Administrative Code [WAC] 197-11-442).

The City has elected to integrate SEPA and the Washington State Growth Management Act (GMA) in both the process and the document. Integration of the environmental analysis with the planning process informs the preparation of GMA comprehensive plan amendments and facilitates coordination of public involvement activities. The information contained in this Draft SEIS will assist the City in refining a preferred alternative, related comprehensive plan amendments, and implementing regulations. This Draft SEIS will supplement the 2010 EIS, prepared for the current City Comprehensive Plan, and will support the City Comprehensive Plan as it may be amended through this update process.

Phased Review

SEPA encourages the use of phased environmental review to focus on issues that are ready for decision and to exclude from consideration issues already decided or not yet ready for decision making (WAC 197-11-060(5)). Phased review is appropriate where the sequence of a proposal is from a programmatic document, such as an EIS addressing a comprehensive plan, to documents that are narrower in scope, such as those prepared for site-specific, project-level analysis. The City is using phased review in its environmental review of the City Comprehensive Plan update with a programmatic review of the proposal and alternatives. Examples of proposals that may require more area-specific or site-specific SEPA review when more details are known include, but are not limited to, capital improvement projects and private development, except for planned actions or infill exemptions as described below.

EIS Scoping and Public Comment

In accordance with the requirements of SEPA and GMA, the City has provided for continuous public review and comment over the course of the planning process. First, the City conducted scoping, including an opportunity for written and oral comments. See Section 2.3 of this EIS for additional description of the scoping process as well as Appendix A. In addition, a 60-day comment period has been initiated with issuance of this Draft EIS, and public meetings will be held as identified in the fact sheet at the front of this document.

Study Area

For the purposes of this Draft SEIS, the study area consists of the area within the city limits and current Urban Service Area (USA)/Urban Growth Area (UGA) boundary, referred to herein as the study area. See Chapter 2 for an illustrative map.

1.3 Public Involvement

The Sumner City Council adopted a Comprehensive Plan in compliance with the Washington State Growth Management Act (GMA) on April 4, 1994. The Comprehensive Plan was updated significantly in 2004 and again in 2010 and has been amended almost annually. Each plan update process included extensive opportunities for public involvement both in plan development and as part of the public involvement and notice provisions required for compliance with SEPA.

The City is preparing to undertake the 2015 Comprehensive Plan Update as required by the GMA. Staff has completed the *Periodic Update Checklist for Cities Updated June 2013*, several public workshops seeking the public's thoughts on what is needed for the future, and a Community Survey. Feedback from the public involvement process influenced development of the proposal being analyzed as part of the SEIS process.

1.4 Proposed Action, Alternatives, and Objectives

Proposal 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:

- Accommodate the City’s fair share of population and employment forecasts to meet GMA requirements and the City vision.
- Reinforce Sumner’s role as a job center serving south King County and east Pierce County. Provide a variety of employment opportunities and commercial services for the community.
- Provide a range of housing types in the community in an efficient pattern that also recognizes environmental constraints and community character.
- Protect ecological conditions and functions and values of critical areas.
- Facilitate mixed-use development in the Town Center and East Sumner neighborhoods.
- Provide multimodal improvements to support the land use vision.
- Provide capital facilities and services at levels of service that meet community needs and the City’s fiscal capacity.
- Consider location-specific amendment requests consistent with the annual comprehensive plan review cycle.
- Ensure that the comprehensive plan and development regulations are consistent with a new horizon year and desired growth patterns.

The degree to which each alternative accomplishes the objectives is addressed in this Draft SEIS, particularly in Section 3.8, “Relationship to Plans and Policies.”

Alternatives

Alternative 1: No Action

For the purpose of this analysis, the No Action Alternative represents the continuation of the City’s current Comprehensive Plan (adopted April 1994, with updates through 2014). No GMA policy and code updates would be made. No land use or zoning map amendments would occur. The present 2030 horizon would remain in the plan.

Exhibit 2-5 depicts Comprehensive Plan land use designations under the No Action Alternative; Exhibit 2-6 illustrates the corresponding zoning.

The No Action Alternative includes the following:

- Future Land Use and zoning consistent with 2010 No Action Future Land Use in the City Limits and Urban Service Area/Urban Service Area; and
- Sumner Meadows Golf Course Alternative 2 establishing a Light Industrial designation and M-1 zoning along Stewart Road and Golf Course as approved in 2014.

This alternative would result in surplus capacity for year 2030 population, housing, and jobs allocation, surplus 2035 capacity for population and employment, and a deficit for the proposed 2035 housing allocation¹.

Alternative 2: Minimal Zoning Action

The Minimal Zoning Action Alternative includes the items in the No Action Alternative plus the following:

¹ PSRC estimates the household size to be 2.18 in the year 2030 and therefore has been used to calculate population capacity.

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- East Sumner Neighborhood Plan: Minimal Action (Rezoning) Alternative (Summarized further below).
- Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue.
- Retain Medium Density Residential (MDR) along the East Valley Highway.
- Increase buildable land units in Town Center by 25% (net increase of 58 units above No Action) due to elimination of the condominium requirement for multi-family around the train station and changes to required parking in the Town Center to promote development.
- Assume a job mix in the City that recognizes trends based on Puget Sound Regional Council's Land Use Targets Workbook showing a more intense employment density.
- Amend the Manufacturing/Industrial Center boundary to include the former Sumner Meadows Golf Course.
- Remove PMUD overlay from Fleischmann's property and include it in the MIC.
- Remove Design District designations.
- Amend Private Public Utility Facility designations on former Cascade Water Alliance property that has been surplused.
- Retain "Joint Planning Area" as a future southern expansion to keep in policy and the Plan for future reference, and describe in policy what is meant by this area.
- Implement SEPA Tools– East Sumner, with either a Planned Action or Infill Exemption.
- Update Critical Area, Subdivision, Zoning and Development Regulations for consistency with the Comprehensive Plan.

Alternative 2 assumptions show it can meet population, housing and employment targets at 2030 and planning estimates at 2035.

Alternative 3: Assertive Collaborative Action

The Assertive Collaborative Action includes all of the elements of Alternatives 1 and 2 with the exception of:

- East Valley Highway – Industrial Use: The MDR designation on East Valley Highway would be redesignated and rezoned to Light Industrial, M-1.
- Town Center Multifamily Use: Increase buildable land units in Town Center by 25% (net increase of 115 units above No Action) due to elimination of the condominium requirement for multi-family around the train station and changes to required parking in the Town Center to promote development.
- East Sumner –Assertive Collaborative Action: The Assertive Collaborative Action leverages public improvements to promote new investments in commercial and residential development. This concept is summarized further below.

Alternative 3 has capacity to meet all growth targets at 2030 and planning estimates at 2035.

Citywide Policy Changes

The City has conducted an audit of this Comprehensive Plan. In addition to minor housekeeping edits to remove outdated policies and integrate more recent initiatives, the City is considering citywide policy changes for both Alternatives 2 and 3. See Chapter 2 for a detailed list of changes.

Citywide Code Changes

The proposed zoning and development code updates are consistent between Alternatives 2 and 3. The City would update the development regulations to ensure that critical area regulations are based on the best available science, to require concurrency consistent with state law, to facilitate development in the downtown core, address the siting of essential public facilities. See Chapter 2 for more information.

Trends Information

All alternatives assume implementation of a robust industrial and commercial component. To capture trends, the SEIS studies different job mixes:

- Alternative 1 assumes a job mix consistent with sector breakdowns in the Manufacturing Industrial Center (MIC) Study (2009). That assumes much higher Construction/Resource jobs at over 38%.
- Alternatives 2 and 3 assume a job mix based on the Puget Sound Regional Council's Land Use Targets Workbook and the Sumner Meadows Industrial mix. This shows a trend towards commercial and service jobs, less construction/resource jobs, and still one third of jobs in warehousing and manufacturing.

East Sumner Neighborhood Plan Alternatives

ES-1: No Action

The No Action Alternative maintains the existing zoning and land use in the East Sumner Neighborhood. The existing zoning includes areas designated for Neighborhood Commercial (NC), General Commercial (GC), MDR, and a range of low-density residential districts. Alternative 1 does not include any investments in public infrastructure that are included in either of the action alternatives.

East Sumner would grow according to current planning and zoning allowances and without additional infrastructure or SEPA process incentives. Planned growth would include the following net increases:

- 2010-2035 Dwelling Units: 246
- 2010-2035 Jobs: 418

ES-2: Minimal Zoning Action

This alternative is focused on rezoning properties in the East Sumner neighborhood to allow multi-family and mixed-use development along with planned improvements to Main Street. A new Urban Village Designation would be applied along East Main Street. GC zoning would be applied along 64th Street. Low Density Residential (LDR) is retained along Salmon Creek and north of East Main Street. Alternative 2 does not include substantial public investment in infrastructure including an off-site wetland mitigation bank, new street improvements, open space or trail investments.

East Sumner would grow according to revised planning and zoning allowances, minimal infrastructure improvements, but with SEPA process incentives. While there would be some upzoning of land, due to the presence of wetlands limiting the type and pattern of growth, development would be moderate, and higher than No Action particularly for housing, but less than Alternative 3:

- 2010-2035 Dwelling Units: 355
- 2010-2035 Jobs: 418

ES-3: Assertive Collaborative Action Alternative

The Assertive Collaborative Action involves street improvements, design and construction of a new street, wetland mitigation, rezoning and the establishment of a park along Salmon Creek. This alternative maximizes future development potential for multi-family and mixed-use development in the neighborhood. The alternative specifically includes the following actions:

- Build 62nd St. E from 160th Ave E to Sumner-Tapps Hwy with a major intersection there.

- Build a new local street from 64th Street E to 60th Street East. Establish an off-site mitigation bank, likely at City AG zoned property south of 24th Street E.
- Property owners will address stormwater issues on-site or collectively.
- Rezone to encourage more intense commercial or mixed-use development south of the new 62nd St E and east of the YMCA.
- Improve Main Street, especially for pedestrians and cyclists.
- Establish a park along Salmon Creek

In order to allow for urban development, wetland mitigation would have to occur in a collective offsite location. Likely this would occur on public property. Two options include the City-owned property on the central block along Salmon Creek, and City-owned AG zoned property west of the BNSF Railroad Tracks and south of 24th Street.

East Sumner would have a greater potential for growth due to amended planning and zoning allowances and more extensive infrastructure and offsite wetland mitigation efforts, as well as the SEPA process incentives. Planned growth would include the following net increases:

- 2010-2035 Dwelling Units: 500
- 2010-2035 Jobs: 581

SEPA Tools: Planned Action or Infill Exemption

The City of Sumner is considering application of one of two SEPA tools in East Sumner that facilitate environmental review of proposals that are consistent with City plans and regulations and the mitigation measures of this SEIS – a planned action or an infill exemption. A planned action ordinance has been provided for consideration by the City. Each is described below.

Planned Action Ordinance (PAO): A planned action provides more detailed environmental analysis during the early formulation stages of planning proposals rather than at the project permit review stage. Future development proposals consistent with the planned action ordinance do not have to undergo an environmental threshold determination, and are not subject to SEPA appeals when consistent with the planned action ordinance including specified mitigation measures. Planned actions still need to meet the City's development regulations and to obtain necessary permits.

Residential Mixed Use/Infill Exemption: Cities or counties that are subject to GMA can use an EIS prepared for their comprehensive plan or subarea plans, to establish an exemption for residential, mixed-use, or commercial (non-retail) projects. Based on SEPA (RCW 43.21C.229) the exemption must be limited to new residential or mixed-use development within a designated urban growth area where the existing "density and intensity of use is lower than called for in the goals and policies of the applicable comprehensive plan." This tool can be prepared at a broader programmatic level of detail. Because it is an exemption, the agency should be confident, based on sufficient code requirements, that it does not need its SEPA authority to condition the proposal. However, where it is found appropriate, the exemption can streamline permitting by requiring less information from the project applicant; for example, a SEPA threshold determination would not be required for an exempt development.

Comparison of Alternatives

All three alternatives are based on the same boundaries for the UGA and would result in the following comparisons (see Exhibit 1-1):

- The No Action Alternative does not meet the 2035 housing target and results in a deficit of housing units by approximately 105 units.
- The zoning changes proposed for the East Sumner Neighborhood are the same between the two action alternatives. The Assertive Collaborative Action Alternative includes investments in infrastructure that will result in a greater likelihood of plan implementation and build out.

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- The MDR zoning designation is retained along the East Valley Highway with Alternative 2 to provide a variety of housing types. The MDR zoning designation is amended to M-1 for Alternative 3 and reinforces the employment character.
- The population, housing and employment capacities between the two action alternatives are generally consistent.

Exhibit 1-1. Alternatives Comparison

Feature	No Action	Minimal Zoning	Assertive Collaborative
Land Area (Acres)	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931
Population Capacity (Persons) in City Limits	13,184	13,547	13,610
Housing Capacity (Dwelling Units) in City Limits	5,988	6,155	6,183
Employment Capacity (Jobs) in City Limits	21,909	21,909	22,262
Comprehensive Plan Amendments	None	Land Use Map amendments regarding PPUF Surplused Property to LDR and Wood Avenue NC to M-1. Update Comp Plan Elements to address 2010-35 growth, housekeeping items, and for consistency. Updated East Sumner Neighborhood Plan.	Same as Alternative 2 plus MDR changed to M-1 along East Valley Highway Same as Alternative 2. Same as Alternative 2.
Zoning Map Changes	None	Remove Design Districts Add MIC to Sumner Meadows and Fleishmann's sites. Remove PMUD overlay from Fleishmann's and surrounding properties. Amend Wood Avenue NC to M-1. Change AG zone to Residential Protection. Upzone East Sumner to allow for mixed-use development, multi-family residential, and local and regional retail.	Same as Alternative 2 plus MDR changed to M-1 along East Valley Highway.

Feature	No Action	Minimal Zoning	Assertive Collaborative
Development Regulation Amendments	None	Critical Areas Regulations amendments, Town Center Parking, and eliminating Condo Requirements, Implement Sumner Meadows Zoning Changes, Subdivision Regulations, and Concurrency Requirements.	Same as Alternative 2.
Public Improvements	None	Transportation Master Plan proposed Improvements, including improvements to Main Street.	Transportation Master Plan proposed Improvements, including new Street Improvements, Off-site Wetland Mitigation Bank, Open Space, and Trails.

Source: City of Sumner 2014; BERK Consulting 2014

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

Prior to preparation of the Final EIS, the City plans to resolve the following:

- East Sumner Neighborhood and whether there will be a more assertive investment in infrastructure and intensive land use pattern with offsite habitat improvement (e.g. wetland mitigation bank).
- Appropriate balance of jobs and housing considering requests for employment along East Valley Highway.
- Whether condominium requirements will be removed in the Town Center. This issue has an effect on growth capacity and the City's ability to meet growth targets for at least one of the alternatives (Alternative 2).
- Refinement of Comprehensive Plan goals, objectives and policies and development regulations.

1.6 Summary of Impacts and Mitigation Measures

Exhibit 1-2 provides a summary comparison of potential impacts of each alternative studied in the Draft SEIS. For a more complete discussion of impacts and associated mitigation measures, please see Chapter 3.

Exhibit 1-2. Summary of Alternative Impacts and Mitigation Measures

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
Earth			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> There is a potential for new development under all alternatives. All new development would be in seismic and volcanic hazard areas, or within or abutting landslide or erosion hazard areas, and potentially vulnerable to a greater risk of damage from these events. 		
Impacts of Each Alternative	<ul style="list-style-type: none"> Developments near the former Sumner 	<ul style="list-style-type: none"> Impacts are consistent with the No Action 	<ul style="list-style-type: none"> Impacts are consistent with the No Action

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	Golf Course within the seismic and volcanic hazard areas. Some future residential development could occur on the Sumner East Hill, which may subject future growth to the potential for erosion or landslide hazards.	Alternative.	Alternative.
East Sumner Neighborhood	<ul style="list-style-type: none"> Impacts are consistent with the Impacts Common to All Alternatives. 	<ul style="list-style-type: none"> Future developments occurring as a result of the new zoning changes would need to comply with current building standards and may need to undergo geotechnical analysis as necessary. Future population and employees would be subject to potential geologic hazards such as the seismic and volcanic hazards prevalent along the valley floor, though there would be less growth than for Alternative 3, the Assertive Collaborative Action. 	<ul style="list-style-type: none"> The higher intensity land use will increase populations in this area that are subject to potential geologic hazards such as the seismic and volcanic hazards. Future developments occurring as a result of the new zoning changes would need to comply with current building standards and may need to undergo geotechnical analysis as necessary. The Assertive Collaborative Action alternative also involves the most earth disturbance of the alternatives.
Mitigation Measures	<p>Incorporated Plan Features</p> <p>No additional geologic related plan features are incorporated into this update. Existing policies will remain in effect, such as those in the Environmental Element of the current Comprehensive Plan.</p> <p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none"> The City has adopted the International Building Code (SMC 15.08.010) and a City Erosion Control Ordinance (SMC 16.05) to reduce impacts caused by earthquakes, soil instability and erosion. Critical areas ordinances provide restrictions and regulations on certain types of development, and provides notices and reporting requirements for development within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas (SMC 16.50, 16.52, and 16.54.) <p>Other Potential Mitigation Measures</p> <ul style="list-style-type: none"> The City could continue to adopt an emergency management ordinance for the reduction of risk from situations like earthquakes and volcanic eruptions or mudflows as part of the Pierce County Emergency Management System. The City could pursue implementation of mitigation measures outlined in the Pierce County Natural Hazard Mitigation Plan. Conditions of approval for future development may include pre-loading, foundation and footing system design considerations, parking area asphalt design, and compliance 		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	with the International Building Code standards, among other requirements and considerations.		
Flooding			
Impacts Common to All Alternatives	<ul style="list-style-type: none">Since all alternatives provide opportunity for future new developments within the floodplain, all alternatives have the potential to impact the floodplain by increasing the amount of structures, fill, and impervious surfaces.A ‘no-rise’ scenario is proposed as part of all alternatives, including No Action and the Minimal Zoning and Assertive Collaborative Action Alternatives. If a development is anticipated to result in an increase in base flood elevations, it will be required to conduct flood storage mitigation in order to result in a net zero rise. This will ensure future development will not contribute to the flood zones of downstream properties.		
Impacts of Each Alternative	<ul style="list-style-type: none">Impacts are consistent with the Impacts Common to All Alternatives. The White River valley is at greatest risk of flood events and has the greatest potential for new light industrial development such as north and south of Stewart Road.	<ul style="list-style-type: none">Impacts are consistent with the Impacts Common to All Alternatives and the No Action Alternative.	<ul style="list-style-type: none">Impacts are consistent with the Impacts Common to All Alternatives and the No Action Alternative.
East Sumner Neighborhood	<ul style="list-style-type: none">The majority of Salmon Creek is not mapped with a 100-year floodplain. Within East Sumner, no zoning changes are proposed and the area is not located within the floodplain of the White or Puyallup Rivers.	<ul style="list-style-type: none">The change in zoning within the East Sumner Neighborhood will not lead to developments that significantly impact the floodplain since it is not within the 100-year floodplain of the White or Puyallup Rivers.	<ul style="list-style-type: none">In the East Sumner Neighborhood future infrastructure improvements and higher intensity development would occur outside of the White or Puyallup River floodplains. Therefore this alternative essentially does not result in an increase of floodplain impacts compared to the impacts common to all alternatives. However provisions will have to be put in place to avoid potential flooding along the Salmon Creek.
Mitigation Measures	Incorporated Plan Features <ul style="list-style-type: none">The existing <i>City of Sumner Comprehensive Plan</i> contains goals and policies related to floodplain development and environmentally sensitive areas. All alternatives retain these goals and policies and the two action alternatives include consideration of additional policies that address flooding as outlined below.Under the No Action Alternative, the 2014 Sumner Meadows EIS tested and recommended a zero rise policy and studied habitat and flood hazard reduction projects. The Action Alternatives include a Best Available Science Review and recommended update of the Critical Areas Regulations to include adoption of a zero-		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	rise policy studied in 2014.		
	<p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none">▪ The City will continue to implement requirements of the NFIP to protect new and existing development in and near floodplains.▪ The City has adopted the Washington State Department of Ecology (Ecology) Low Impact Development Manual (LID) and a requirement for LID approaches to stormwater management for new development.▪ The City will continue to cooperate with Pierce County Water Programs and King County implement conveyance improvements required along rivers.▪ The City will continue to enforce the Shoreline Master Program and critical area regulations as currently adopted or as amended in the future. <p>Other Potential Mitigation Measures</p> <ul style="list-style-type: none">▪ Several regional floodplain conveyance and connectivity improvements are proposed as part of the 24th Street Bridge or standalone projects that would result in no increases in water surface elevations during the 100-year flood event. This will improve flood storage and eliminate inundated areas currently present in the Stewart Road light industrial lands and other downstream areas. These floodplain enhancement areas are proposed primarily along the left (east) bank of the White River between approximately Stewart Road East and 142nd Avenue East/Tacoma Avenue. This includes areas that are currently the most often inundated from flooding. The work would include excavation of the overbank to provide additional floodwater storage, planting of native riparian vegetation and installation of habitat structures.▪ In addition to current plans and regulations the City should:<ul style="list-style-type: none">○ Implement a zero-rise policy for development in floodways and floodplains○ Add new Comprehensive Plan policies to further support Low Impact Development (LID)○ Consider district stormwater treatment facilities in East Sumner.○ Consider other options for complying with the Biological Opinion, including:○ Restrict development in the 100-year floodplain○ Adopt the model ordinance○ Submit City regulations and a checklist to document compliance under existing regulations.▪ Conceptual floodplain enhancements are modeled to prevent a net rise in surface water elevations if the assumed developments occur. If any other developments occur that are not included in the model, additional analysis and mitigation strategies would need to be conducted to meet City requirements.▪ Implementation of steam conveyance improvements for Salmon Creek. This includes the proposed realignment of a portion of Salmon Creek near its crossing under E Valley Highway E.		
Plants and Animals			
Impacts Common to All Alternatives	<ul style="list-style-type: none">▪ Vegetation - Development of any form would have direct impacts on vegetation through the physical removal of vegetation whether it is native vegetation or landscaped. Disturbances could also result in a higher recruitment of non-native plant species that tend to establish quickly and colonize in areas where soils have been disturbed. Impacts to wetland vegetation would reduce the amount of water filtration from stormwater runoff that they collect.▪ Fish and Wildlife Habitat - Development of vacant or underdeveloped properties could lead to habitat fragmentation and loss of habitat connectivity. This further reduces the biodiversity of the larger area. Development and increases of impervious surface also		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<p>reduce quality of aquatic habitat directly and indirectly. It could impact aquatic habitat directly through the conversion of habitat to less suitable habitat or reduction of habitat and by potentially introducing sources of pollution that may enter the water body. It impacts aquatic habitat indirectly by increasing peak flows, reducing low flows, and increasing water temperatures from runoff and reducing the amount of shade. Impacts to aquatic habitat would be minimal from any of the alternatives due to the regulations in place required prior to any individual development project occurs. This includes but is not limited to buffer requirements, allowable in-water work windows, tree preservation/mitigation requirements, and water quality treatment requirements.</p>		
Impacts of Each Alternative	<ul style="list-style-type: none"> Developments would occur to areas that are currently under-developed. In valley lands, such as large parcels remaining for development in vacant and zoned light industrial areas along Stewart Road or East Valley Highway, this would cause disturbance to species that utilize open fields and fragmented wetland features. Developments along East Hill could disturb forested habitats. 	<ul style="list-style-type: none"> Impacts are similar to Alternative 1. Changes to development regulations will not result in any impacts to fish/wildlife or their habitats since they only consist of change in use of areas that are already disturbed and developed, e.g. Wood Avenue reclassification. The application of the Residential Protection zone in place of the AG zoning would substitute a protective zone with low impervious area for a similar protective zone; the City would still be subject to a prior agreement with federal services to limit impervious areas on this property, and therefore impacts are not anticipated. 	<ul style="list-style-type: none"> Citywide and UGA development patterns and impacts are similar to Alternative 2 except that an area along East Valley Highway with smaller lots would be reclassified from MDR to M-1 zoning, both urban zones with a potential for greater impervious area, particularly M-1.
East Sumner Neighborhood	<ul style="list-style-type: none"> In East Sumner, impacts would be at a smaller scale than the other alternatives (especially alternative 3) since no additional specific infrastructure improvements are proposed in East Sumner. 	<ul style="list-style-type: none"> In East Sumner, this alternative only involves zoning changes and minor improvements to East Main Street. It would allow for higher density developments. However, individual development proposals would need to comply with critical areas regulations. 	<ul style="list-style-type: none"> Alternative 3 would have increased potential impacts to plants and wildlife compared to Alternatives 1 and 2, due to its proposed infrastructure improvements. The new roads would result in direct impacts to vegetation, wetlands, and increases in impervious surface. Wetland mitigation would be necessary from these proposals and would most likely occur off-site. Well planned off-site wetland

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
			mitigation would be beneficial compared to existing wetlands given their fragmentation and invasive species.
Mitigation Measures	<p>Incorporated Plan Features</p> <ul style="list-style-type: none">▪ The No Action Alternative would continue Environmental Element policies while Action Alternatives 2 and 3 would update the Element and implement a Best Available Science Review of critical areas regulations.▪ Mitigation for the new street(s) and infrastructure improvements is included in Alternative 3. It proposes establishment of a wetland mitigation bank within public property south of 24th Street and on the west side of the river which will be utilized to obtain mitigation credits for impacts to wetlands from the road projects. A larger connected mitigation bank would improve habitat value and water treatment functionality compared to the existing patches of fragmented wetlands within the East Sumner Neighborhood. The bank would use a watershed approach to integrate the wetland function into the comprehensive flood management plan.▪ The Assertive Collaborative Action alternative provides improved wetland and wildlife habitat as well as a significantly improved capacity towards economic growth and development. It advances the City towards the goal of having an urban village in East Sumner which would also help reduce single occupancy travel by promoting walkability and transit use. <p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none">▪ City of Sumner Shoreline Master Program (SMP)▪ NFIP and compliance with the Biological Opinion▪ Critical Area Regulations that address wetlands, streams and wildlife habitat areas▪ City of Sumner stormwater regulations and implementation of the National Pollutant Discharge Elimination System (NPDES) requirements <p>Additional Mitigation Measures</p> <ul style="list-style-type: none">▪ The City could work with the Pierce County Biodiversity Alliance to complete the City of Sumner section of the Lower White River BMA Stewardship Plan.▪ Restoration of select locations along Salmon Creek. Proposed conceptual restoration locations are east of Parker Rd E, near the utility access road and northeast of the intersection at 45th St. Ct. E and 154th Ave Ct. E. These improvements would involve the removal of invasive species (reed canarygrass), planting of native riparian vegetation, and installation of habitat features (i.e. large woody debris and large boulders.) Restoration of Salmon Creek would provide improved habitat for spawning salmon and result in an increase in salmon returns and therefore fry production.		
Water Resources			
Impacts Common to All Alternatives	<ul style="list-style-type: none">▪ In general, population growth and development have direct and indirect impacts to local water quality. The increase in population, work force, and therefore businesses could result in higher potential for releases of pollutants to surface waterbodies. Increased traffic volumes produce more stormwater that requires treatment prior to discharge. Increased development and impervious surfaces often result in less vegetation coverage that can naturally filter runoff. It also results in higher runoff volumes entering the surrounding rivers and streams and reduces groundwater recharge rates.▪ The majority of the City of Sumner is within the critical aquifer recharge area and therefore is susceptible to groundwater contamination. Potential sources of contamination that can impact groundwater sources are leaks or releases of petroleum products, pesticides, fertilizers, herbicides, and septic systems.		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
Impacts of Each Alternative	<ul style="list-style-type: none"> Impacts are consistent with the Impacts Common to All Alternatives 	<ul style="list-style-type: none"> Impacts are consistent with the Impacts Common to All Alternatives 	<ul style="list-style-type: none"> Proposed rezoning will result in higher impervious surface allowances increasing the potential for increased stormwater runoff.
East Sumner Neighborhood	<ul style="list-style-type: none"> Impacts are consistent with the Impacts Common to All Alternatives 	<ul style="list-style-type: none"> Proposed rezoning will result in higher impervious surface allowances, but infill development may improve water quality by improving stormwater management and treatment. 	<ul style="list-style-type: none"> Proposed rezoning will result in higher impervious surface allowances increasing the potential for increased stormwater runoff. Displacement of wetlands that help that filter stormwater runoff, store runoff and reduce the amount of runoff discharged to the White and Puyallup Rivers. The proposed public improvements and wetland mitigation bank will address these impacts.
Mitigation Measures	<p>Incorporated Plan Features</p> <p>The Comprehensive Plan incorporates goals and in order to protect water quality as required by the Washington State Growth Management Act (GMA). Those goals and policies of the Environmental Element include:</p> <ul style="list-style-type: none"> Monitoring surface water discharges to provide a sufficient data base for determining if water quality is being maintained. Working closely with other agencies and adjacent jurisdiction to protect groundwater resources that affect the City's water supply and educate the public about the potential impacts human activity has on water quality within the aquifer recharge area. Continue implementation of Low Impact Development (LID) techniques wherever feasible. LID provides methods that improve stormwater quantity and quality control that mimics the natural hydrology of the site as close as possible. The goal of LID techniques is to treat stormwater as a resource rather than a waste product and help preserve natural landscape features. They provide attractive settings while improving stormwater quality/quantity control at the same time. Common techniques include bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. The current Comprehensive Plan includes a policy for incorporating LID principles and practices into the design, construction, and operation of all City facilities and City-funded projects when economically feasible. It also encourages LID use for both public and private developers. <p>There will be no change to these features by any of the proposed alternatives.</p> <ul style="list-style-type: none"> Alternatives 2 and 3 involve updating critical areas best available science which will provide an improved base line for future protection and restoration activities and to better determine priority restoration areas. Alternative 3 proposes establishment of an off-site wetland mitigation bank that can be used for future development projects and will provide improved habitat value compared to existing fragmented wetlands. <p>Applicable Regulations and Commitments</p>		

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	<p>The City’s critical area regulations provide strict provisions for the protection of wetlands, aquifer recharge areas, and buffer zones around local rivers and streams. SMC 16.05 provides regulations relating to the control of erosion and sedimentation to reduce sediment pollution from construction activity. SMC 16.48 regulates development and land use in aquifer recharge areas while SMC 16.46 provides the regulations for development in or near wetlands and requirements for mitigation if filling of wetlands should occur.</p> <p>Water quality protection is also enacted by SMC 13.48: stormwater management regulations. These regulations “establish minimum requirements and procedures to control the adverse impacts associated with increased stormwater runoff and water quality degradation for all sites located within the city...” These regulations also adopt use of the:</p> <ul style="list-style-type: none">▪ 2012 Ecology Stormwater Management Manual for Western Washington▪ NPDES Western Washington Phase II Municipal Stormwater Permit, Minimum Technical Requirements for New Development and Redevelopment▪ 2005 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound <p>The City of Sumner has recently updated and adopted a revised Shoreline Master Program (SMP) in December 2014. It was approved by Ecology on December 12, 2014 and was effective as of December 26, 2014. The revised SMP regulates approximately six miles of the White River and 1.5 miles of the Puyallup River. Additional measures that protect or restore surface water bodies are included in this document.</p> <p>Other federal and state regulations in effect to protect water quality are the Safe Drinking Water Act and the EPA’s NPDES Phase II regulations for stormwater management. The Safe Drinking Water Act requires public water system wells to be protected from potential sources of contamination. The EPA authorized the Washington State Department of Health to implement this rule by establishing a Wellhead Protection Program for all current wellhead sources (such as the South Well, Sumner, Weber/Crystal, and County springs). The wellhead protection zones are the 10-year time travel boundary that represents the maximum distance around a pumping well from which a hypothetical contaminant in the groundwater could travel to the well in a 10-year period. The City currently publishes an annual water quality report that summarizes test results of the wells and groundwater sources.</p> <p>Additional Mitigation Measures</p> <p>None proposed.</p>		
Air Quality and Greenhouse Gases (GHG)			
Impacts Common to All Alternatives	<ul style="list-style-type: none">▪ Construction Impacts - Dust from excavation and grading may cause temporary, localized increases in ambient concentrations of fugitive dust suspended particulate matter. Diesel powered heavy trucks and small equipment will emit air pollutants that could slightly degrade local air quality in the vicinity of the construction site. Some construction activities could cause odors detectable to those in the vicinity of the construction. Construction equipment and material hauling could temporarily increase traffic flow on city streets adjacent to a construction area. If construction delays traffic enough to significantly reduce travel speeds in the area, general traffic-relate emissions would temporarily increase.▪ Operational 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. The expansion of roadways as a result of future development the localized level of mobile source air toxics (MSAT) could be higher, but this could be offset by reductions in congestion. Localized CO impacts could occur at major intersections that experience significant traffic congestion. Increased tailpipe emissions from trips associated with new development may be offset by increased per-vehicle tailpipe emission rates. Air quality impacts are expected to increase as a result of new industrial/commercial		

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	development. Given the proximity to residential areas impacts to residences may result from stationary equipment, mechanical equipment and trucks at loading docks unless property controlled.		
Impacts of Each Alternative	<ul style="list-style-type: none"> Impacts are consistent with the Impacts Common to All Alternatives. The increase in metric tons CO₂e per year above existing would equal 831,234. The Forecast Daily Vehicle Miles Travelled (VMT) would be the least at 105,069. 	<ul style="list-style-type: none"> Impacts are generally consistent with the Impacts Common to All Alternatives with an expected increase of 2,537 metric tons CO₂e above Alternative 1. This GHG emissions increase above No Action is less than what is considered significant (less than 25,000 metric tons CO₂e), and implementation of Alternative 2 should not require mitigation measures beyond those required to comply with existing air quality regulations. Alternative 2 would result in approximately 110,135 VMT per day, which is only 0.13% of the total VMT in the region. 	<ul style="list-style-type: none"> Greenhouse gas emissions are greater under Alt 3, but constitute a “business as usual increase” of 19,853 metric tons of CO₂e above Alternative 1. Although this estimated increase is higher than from Alternative 2, the forecast annual GHG emission rate increase does not exceed the significance threshold of 25,000 metric tons CO₂e per year. Alternative 3 would result in approximately 110,465 VMT per day, which is only 0.13% of the total VMT in the region.
East Sumner Neighborhood	<ul style="list-style-type: none"> Impacts are consistent with the Impacts Common to All Alternatives 	<ul style="list-style-type: none"> Impacts are considered cumulatively with the citywide analysis. 	<ul style="list-style-type: none"> Localized construction and operational impacts may be greater under this alternative due to the planned public improvements and greater amount of development anticipated. GHG and VMT are considered cumulatively with the citywide analysis.
Mitigation Measures	<p>Incorporated Plan Features</p> <p>The City of Sumner Comprehensive Plan (City Comprehensive Plan) includes goals and policies that would reduce air pollutant emissions in the following element (see Section 3.5 for a complete list of policies:</p> <ul style="list-style-type: none"> Commuter Rail/Regional Transit Sub-Element Economic Development Element Community Character Element Environment Element Transportation Element <p>Additionally, action alternatives would include new environmental element policies regarding climate change and sustainability.</p>		

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	<p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none"> ▪ National Ambient Air Quality Standards: As described above in National Ambient Air Quality Standards, the EPA establishes NAAQS and specifies future dates for states to develop and implement plans to achieve these standards. ▪ State Ambient Air Quality Standards: Ecology establishes state ambient air quality standards for the same six pollutants that are at least as stringent as the national standards; in the case of SO₂, state standards are more stringent. Table 3.5-1 lists the state ambient air quality standards for six criteria pollutants. ▪ Indoor Burning Smoke Reduction Zone: PSCAA and Ecology's regulatory framework for wood smoke includes: <ul style="list-style-type: none"> ○ More stringent emission standards for new wood burning devices than the federal EPA standards ○ Opacity standards for wood-burning appliances ○ Prohibitions on burning of certain materials or non-certified wood stoves ○ Burn ban curtailment program ○ Special attainment area provisions ▪ Outdoor Burning: Burning yard waste and land-clearing debris is not allowed at any time in the City or in Pierce County. PSCAA enforces state outdoor burning regulations required by RCW 70.94.743. ▪ Puget Sound Clean Air Agency Regulations: All construction sites in the Puget Sound region are required to implement rigorous emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15: Fugitive Dust Control Measures. All industrial and commercial air pollutant sources in the Puget Sound region are required to register with PSCAA. Facilities with substantial emissions are required to obtain a Notice of Construction air quality permit before construction is allowed to begin. ▪ State of Washington GHG Laws: As described above in State of Washington Greenhouse Gas Requirements, Washington enacted a new law establishing GHG reduction limits. ▪ City of Sumner Ordinance 1587: This ordinance requires affected employers (e.g., employers with 100 employees or more at a single worksite) to implement a Commute Trip Reduction program for its employees. <p>Other Potential Mitigation Measures</p> <p>Construction Emission Control</p> <ul style="list-style-type: none"> ▪ 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 to control fugitive dust and odors emitted by diesel construction equipment. ▪ During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. The following Best Management Practices would be used to control fugitive dust: <ul style="list-style-type: none"> ○ Use water sprays or other non-toxic dust control methods on unpaved roadways. ○ Minimize vehicle speed while traveling on unpaved surfaces. ○ Prevent track-out of mud onto public streets. ○ Cover soil piles when practical. ○ Minimize work during periods of high winds when practical. ▪ Mobile construction equipment and portable stationary engines would emit air pollutants including NO_x, 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. 		

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	<p>Typical mitigation measures to minimize air quality and odor issues caused by tailpipe emissions include the following:</p> <ul style="list-style-type: none"> ○ Maintain the engines of construction equipment according to manufacturers' specifications. ○ Minimize idling of equipment while the equipment is not in use. <p>▪ 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.</p> <p>Greenhouse Gas Reduction Measures</p> <p>The City could expand the zones to which incentives and standards are applied to reduce GHG emissions beyond the M-1 zone; the commercial and heavy industrial zones could be included. For example, the City could allow greater building heights or relaxed parking standards for new non-residential construction if the owner or operator adopts one or more of the following mitigation measures:</p> <ul style="list-style-type: none"> ▪ Provide end-of-trip bicycle facilities to employees. It is estimated that providing an incentive for this measure would provide a study area-wide reduction on the increase in employee vehicle trips for the action alternatives compared to existing conditions. ▪ Construct LEED-certified buildings. It is estimated that providing an incentive for this measure would provide a reduction in study area-wide non-residential building energy use (natural gas and electricity) for new construction for the action alternatives compared to existing conditions. ▪ Participate in the PSE Green Power Program. It is estimated that providing an incentive for this measure would provide a reduction in study area-wide non-residential building electricity use for new construction for the action alternatives compared to existing conditions. <p>Additionally, the City could require the following mitigation measure for all new non-residential construction in all commercial and industrial zones and not just the M-1 zone:</p> <ul style="list-style-type: none"> ▪ Use energy-efficient outdoor lighting. It is estimated that requiring more energy-efficient outdoor lighting would provide a reduction in electricity use for new non-residential construction within the study area for the action alternatives compared to existing conditions. <p>Washington State has established GHG reduction goals with targets for 2020 (1990 levels), 2035 (20% reduction below 1990 levels) and 2050 (50% reduction below 1990 levels) limits and adopted requirements for capital investments, an energy strategy, and VMT reduction targets. However, neither Ecology nor the EPA has adopted numerical GHG emissions standards, GHG reduction requirements, or numerical GHG significance thresholds that direct local governmental land use development actions. It is the City's responsibility to implement its own GHG reduction requirements for new developments.</p> <p>Mitigation measures proposed for the action alternatives and development goals and policies within the City's Comprehensive Plan will help to mitigate GHG impacts within the study area. However, the City could also require or encourage future developers to implement additional mitigation, as presented in Exhibit 3-14 and Exhibit 3-15. The measures presented in Exhibit 3-14 and Exhibit 3-15 could reduce GHG emissions caused by transportation, facilities, building construction, space heating, and electricity usage (Ecology 2008). The table lists potential GHG reduction measures and indicates where the emission reductions might occur.</p>		
Land Use			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> ▪ All alternatives will result in increases in population, housing and employment. Vacant land will be developed and land uses will convert to those land uses consistent with the comprehensive plan and zoning. ▪ Approximately 469 acres currently in agricultural, mining, or timber use would be converted to non-resource uses under all alternatives. Approximately 260 acres would 		

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	<p>convert to residential uses, approximately 26 acres would convert to industrial use and 0.7 acres would convert to mixed uses.</p> <ul style="list-style-type: none"> Approximately 196 acres of land currently under single-family residential use would convert to other uses under all alternatives: approximately 64 acres (29%) would convert to multifamily use, 64 acres (29%) would convert to mixed uses, and 12.9 acres (6%) would convert to industrial uses. Approximately 52 acres of multifamily land within the current plan area would convert to other uses. Most of this conversion would occur on the approximately 25 acres of land converting to single-family uses. 		
Impacts of Each Alternative	<ul style="list-style-type: none"> Impacts are consistent with the Impacts Common to All Alternatives 	<ul style="list-style-type: none"> Approximately 96 acres will convert from Agricultural to Residential Protection and approximately 16.3 acres will convert from Public-Private Utilities and Facilities to Low Density Residential. 	<ul style="list-style-type: none"> Additional land will convert to industrial development under this alternative. The proposed rezoning from MDR to M-1 along the East Valley Highway may increase impacts on adjacent residential areas.
East Sumner Neighborhood	<ul style="list-style-type: none"> Under the No Action Alternative less land would convert to uses consistent with the land use and zoning designations than under the two action alternatives. The lack of public improvements, including street improvements and off-site wetland mitigation, along with maintaining the existing zoning designations will continue to limit land use conversions in the East Sumner Neighborhood. 	<ul style="list-style-type: none"> The largest proposed zoning district for Alternatives 2 and 3 will be the new Urban Village (UV) designation that allows for a mix of land uses with an emphasis on land uses that support a compact walkable environment with access to transit. Additional land will convert to uses consistent with the comprehensive plan Urban Village designation and proposed zoning under this alternative. The zoning and minor public improvements included in this alternative will spur additional land conversions in the East Sumner Neighborhood. 	<ul style="list-style-type: none"> The largest proposed zoning district for Alternatives 2 and 3 will be the new Urban Village (UV) designation that allows for a mix of land uses with an emphasis on land uses that support a compact walkable environment with access to transit. The rate of land use conversions in East Sumner would be increased under this alternative due to the significant infrastructure investments by the City including new and existing street improvements, an off-site wetland mitigation bank, and open space and trail improvements.
Mitigation Measures	<p>Incorporated Plan Features</p> <ul style="list-style-type: none"> The new Urban Village Zoning Designation in East Sumner would promote a mix of compatible land uses in a compact and walkable environment in Alternatives 2 and 3. <p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none"> 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. Per the City of Sumner's Zoning Code development is subject to setback, buffer and landscaping requirements to minimize impacts on adjacent land uses, particularly 		

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	<p>between commercial/industrial and residential development.</p> <ul style="list-style-type: none">Certain land uses are subject to conditional use review, which includes a more detailed review of land use compatibility. <p>Other Potential Mitigation Measures</p> <ul style="list-style-type: none">The City could review zoning and subdivision regulations to ensure that adequate setbacks, landscaping, and buffering are required where land use conflicts may occur.The City could consider implementing performance standards that would have to be met prior to approval of certain commercial/industrial developments to minimize any potential impacts on adjacent land uses.		
Population, Employment, and Housing			
Impacts Common to All Alternatives	<ul style="list-style-type: none">Population and employment would increase under all alternatives, though locations of growth would differ.All alternatives would provide the same level of growth in the UGA.Indirect impacts of growth under each alternative would likely include potential encroachment near natural environmental resources and increases in demand for facilities and infrastructure.		
Impacts of Each Alternative	<ul style="list-style-type: none">Alternative 1 can meet 2035 population and employment targets, but not housing targets. As described in Chapter 2, this alternative would result in surplus capacity for year 2030 population, housing, and jobs allocation.Alternative 1 would provide less population and housing than Alternatives 2 and 3.Alternative 1 would provide the same amount of jobs as Alternative 2, but fewer than Alternative 3.	<ul style="list-style-type: none">Alternative 2 can meet population, housing and employment estimates at 2035.This Alternative would result in a higher population and more housing units than the Alternative 1, but the same amount of employees. It would result in a lower population, fewer housing units, and fewer employees than Alternative 3.	<ul style="list-style-type: none">Alternative 3 can meet population, housing and employment targets at 2035.This Alternative would result in a higher population and more housing units than the Alternative 1 and Alternative 2. It would also result in a higher number of employees than the other two alternatives.
East Sumner Neighborhood	<ul style="list-style-type: none">Under this alternative, there would not be any significant change to the existing zoning.Land conversion to other uses consistent with existing zoning, infill development and platting of larger single family and vacant lots may occur.	<ul style="list-style-type: none">Under this alternative, most of the land would be re-zoned to Urban Village or General Commercial while maintaining the Urban Village land use designation, to provide additional housing densities and greater commercial development	<ul style="list-style-type: none">Alternative 3 involves the same rezoning proposal under Alternative 2, but includes significant public investments in infrastructure to facilitate mixed-use development in the district. Due to the investments in infrastructure more

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		intensities.	development and land conversions to higher intensity residential and commercial development is likely to occur.
Mitigation Measures	<p>Incorporated Plan Features</p> <ul style="list-style-type: none">Growth Targets: The action alternatives would provide updated capacity estimates to the year 2035 and help the City meet its population, housing, and employment targets.Action Alternatives would update housing and economic development policies as described in Chapter 2. <p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none">Zoning regulations implement the City Comprehensive Plan to further its policies for business development, population and residential growth, and community character.The City’s zoning code furthers Comprehensive Plan policies for housing density, types of housing, and character. <p>Other Potential Mitigation Measures</p> <p>The SEIS describes the current and future needs for affordable housing. Additional mitigation measures include:</p> <ul style="list-style-type: none">Coordinating with the Pierce County Housing Authority and local non-profit agencies that provide affordable and transitional housing in the Sumner area.The City could adopt multifamily tax exemptions for market-rate and affordable dwellings in the Town Center.Other funding and regulatory measures such as: an inclusionary housing program; fast track permit processing; fee waivers; and reduction in development standards for affordable housing.Providing affordable housing incentives and supporting affordable housing programs sponsored by Pierce County Housing Authority and/or other regional housing agencies.		
Plans and Policies			
Impacts Common to All Alternatives	<p>Growth Management Act</p> <p>Each alternative is weighed in relation to the 13 goals of the GMA. Impacts common to all alternatives include:</p> <ul style="list-style-type: none">All alternatives would guide growth in urban areas.All alternatives would reduce sprawl by allowing for urban level employment and residential uses in city limits.All alternatives recognize property rights.All alternatives retain open space, enhance recreational opportunities, and conserve fish and wildlife habitat.All alternatives increase the demand for public facilities and services and would require mitigation measures to ensure adequate facilities and services.All alternatives would be subject to Comprehensive Plan policies and federal and state laws that promote the protection and preservation of historic and cultural features.All alternatives foster citizen participation and are undergoing public review as part of the SEPA process. <p>Multicounty Planning Policies</p> <ul style="list-style-type: none">All alternatives would be required to comply with the City’s critical area and shoreline		

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	<p>regulations. All alternatives would contribute to greenhouse gas emissions but are similar to one another and do not exceed SEIS thresholds.</p> <ul style="list-style-type: none"> All alternatives focus growth in the city limits. All alternatives would add traffic to the road system, but would be required to meet City concurrency standards. <p>Adjacent City Plans</p> <ul style="list-style-type: none"> None of the three alternatives would result in significant impacts to adjacent city plans. The City of Sumner is not proposing significant amendments to existing land use and zoning designations along the borders with adjacent communities. 		
Impacts of Each Alternative	<ul style="list-style-type: none"> Alternative 1 would not meet housing target estimates in 2035. Alternative 1 would not update the Comprehensive Plan or development regulations consistent with GMA. Alternative 1 would not warrant any immediate changes to the Sumner Zoning Code. 	<ul style="list-style-type: none"> Alternative 2 would update the Comprehensive Plan and development regulations consistent with GMA. Alternative 2 would implement greater housing variety in all present centers and neighborhoods such as the Town Center and East Sumner and retain residential zoning on East Valley Highway. Alternative 2 would amend City planning maps to remove the Agricultural Resource Land Map designation; these lands are not considered of long-term commercial significance. 	<ul style="list-style-type: none"> Alternative 3 would update the Comprehensive Plan and development regulations consistent with GMA. Alternative 3 would implement greater housing variety in the Town Center and East Sumner but reduce housing options along East Valley Highway. Alternative 3 would allow for offsite wetland mitigation from East Sumner. Alternative 3 would remove the Agricultural Resource Land Map designation as with Alternative 2.
East Sumner Neighborhood	<ul style="list-style-type: none"> No update would be made to the 2001 plan. The zoning allowances would continue as is, but the trend with a lack of infrastructure investment and minimal change to private development would also likely continue. 	<ul style="list-style-type: none"> The plan update maintains the key elements of the vision established in the original plan for a walkable mixed-use urban village. The plan update modifies the zoning designations to increase development capacity for housing and jobs in the neighborhood in part to meet future growth targets in compliance with GMA. The plan update also includes a more defined plan and timing for major investments in public facilities. These 	<ul style="list-style-type: none"> Same as Alternative 2, except that greater infrastructure investment would be made to achieve the vision.

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		investments are likely to serve as a catalyst for development in the neighborhood and make progress towards achieving the vision.	
Mitigation Measures	<p>Incorporated Plan Features</p> <ul style="list-style-type: none">All of the plan alternatives have sufficient capacity to accommodate the growth targets for population, housing and employment to the year 2035 with the exception of Alternative 1, which lacks sufficient capacity to meet the housing target for 2035. <p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none">The City of Sumner Municipal Code includes several land development regulations, including zoning, design standards, environmental review, and land division. Other applicable regulations and plans include the Town Center Plan, Design and Development Guidelines, and Shoreline Master Plan. <p>Other Potential Mitigation Measures</p> <p>Improve communication and coordination with Pierce Transit to provide increased transit service to the East Sumner Neighborhood and other areas of the city, or consider developing a long-term community transit system.</p>		
Public Services, Capital Facilities, and Utilities			
Impacts Common to All Alternatives	<p>City Facilities</p> <ul style="list-style-type: none">Under each alternative there will be a deficit of space for general government facilities and City shops in 2035, and a surplus of space for police. <p>Law Enforcement</p> <ul style="list-style-type: none">Under all alternatives it is anticipated that additional growth in the plan area would result in increased demand for public safety services, including additional personnel to meet demand. <p>Fire and Emergency Medical Services</p> <ul style="list-style-type: none">Under all alternatives, new development and population growth will result in an increased demand for fire protection and related services; in particular there would be greater increases in light industrial uses on vacant lands along Stewart Road and East Valley Highway and more mixed uses in the Town Center and East Sumner. <p>Libraries</p> <ul style="list-style-type: none">The Pierce County Library System recommends a level of service standard of 0.61 to 0.71 square feet per capita in its long-term capital facilities plan. The current library space in Sumner of 10,600 square feet is anticipated to meet the 0.61 LOS standard in 2035 under all Alternatives, but not the 0.71 standard. With the expansion of the Sumner Library identified in <i>Pierce County Library 2030</i>, library space would be sufficient to meet demand under all Alternatives. <p>Schools</p> <ul style="list-style-type: none">For the schools in the plan area, student population would likely grow as a result of the anticipated increase in households under the alternatives. Using the Sumner School District’s student factor, net new students in the plan area between the current year and 2035 would be between 1,345 and 1,477. <p>Sewer</p> <ul style="list-style-type: none">Development under all alternatives would increase wastewater flows from the study area, requiring conveyance and treatment, thus placing greater demand on the City’s wastewater collection system. <p>Water</p>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> Under all alternatives, increased population and employment would result in increased demand for water service. With the completion of the Central Well, the water supply capacity of 5.30 million gallons per day will meet the projected 2035 demand under all alternatives. <p>Stormwater</p> <ul style="list-style-type: none"> Additional growth and development will increase the amount of impervious surfaces and the level of stormwater runoff under all of the alternatives. Increases in impervious surfaces will be especially pronounced in areas where the current land use is predominantly agricultural, vacant, or natural. <p>Solid Waste</p> <ul style="list-style-type: none"> Development in the city limits under all alternatives would increase the amount of solid waste generated and directed to regional landfills and recycling and composting centers. <p>Utilities – Power and Telecommunication</p> <ul style="list-style-type: none"> Population growth under any of the alternatives will result in increased demand for utility services. 		
Impacts of Each Alternative	<ul style="list-style-type: none"> Population growth under Alternative 1 would result in demand for 14 additional police officers. Population growth in the plan area under Alternative 1 is projected to result in 1,345 new students. Population growth under Alternative 1 is projected to lead to a wastewater capacity deficit of 1.54 million gallons per day in 2035. 	<ul style="list-style-type: none"> Population growth under Alternative 2 would result in demand for 15 additional police officers. Population growth in the plan area under Alternative 1 is projected to result in 1,469 new students. Population growth under Alternative 1 is projected to lead to a wastewater capacity deficit of 1.57 million gallons per day in 2035. 	<ul style="list-style-type: none"> Population growth under Alternative 3 would result in demand for 15 additional police officers. Population growth in the plan area under Alternative 1 is projected to result in 1,477 new students. Population growth under Alternative 1 is projected to lead to a wastewater capacity deficit of 1.55 million gallons per day in 2035.
East Sumner Neighborhood	<ul style="list-style-type: none"> There are no impacts on City facilities, police, fire and emergency services, library facilities, sewer, water, solid waste, or utilities specific to East Sumner. See the cumulative analysis above and in Chapter 3. Schools: The two elementary schools serving the East Sumner area are likely to be impacted by growth in population and new students under all Alternatives. Stormwater: All three alternatives would result in increases in impervious surfaces with a greater amount under Alternative 3 where filling of wetlands and offsite mitigation are anticipated. Wetland mitigation would have to occur in a collective offsite location, likely on public property. District stormwater facilities are planned under all three alternatives to accommodate increased development. 		
Mitigation Measures	<p>Incorporated Plan Features</p> <p>City Facilities:</p> <ul style="list-style-type: none"> All alternatives propose retaining the existing City Hall, City Shops, and Multi-Purpose Center in public use land use designation. If additional sites are acquired to meet City facility needs, they should be designated similarly. 		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> Under Alternatives 2 and 3 the City is preparing an updated Capital Facilities Plan. <p>Law Enforcement:</p> <ul style="list-style-type: none"> The Capital Facilities Element of the City Comprehensive Plan includes goals, policies, and objectives, which establish LOS standards and provision of services to meet the community's public safety needs. This Element is being updated under Alternatives 2 and 3. New LOS measures for police staffing proposed in the 2014 Comprehensive Plan would help ensure staffing levels are adequate to serve the needs of the City based on both population and employment. These include: one commissioned patrol officer for every 1,000 calls for service each year; one sergeant for every 6-7 commissioned patrol officers; and one detective position at a ratio of 1/400 part A offenses. <p>Fire and Emergency Medical Services:</p> <ul style="list-style-type: none"> The City of Sumner Comprehensive Plan has policies that establish a Level of Service (LOS) for fire services in the city. Under Alternatives 2 and 3 the City is updating the Capital Facilities Element and considering appropriate LOS in conjunction with EPF&R. <p>Libraries:</p> <ul style="list-style-type: none"> The Capital Facilities Element references the Pierce County Library District plans to provide access to library services consistent with the Library District's LOS standards. <p>Schools:</p> <ul style="list-style-type: none"> The Capital Facilities Element contains policies and objectives which are designed to support the Sumner and Dieringer School District in providing the best education for students of the districts and includes objectives for coordination with the school districts on issues of common interest such as school facility locations, impacts of new development on schools, population and growth projections, impacts of school activities on the community, parks and recreation programs, and school involvement in the community. <p>Sewer:</p> <ul style="list-style-type: none"> The City's Capital Facilities Element contains goals and policies regarding wastewater systems. All alternatives would continue to include wastewater policies, and these would be updated in the Capital Facilities Element in Alternatives 2 and 3. <p>Water:</p> <ul style="list-style-type: none"> The City's Capital Facilities Element contains goals and policies regarding water systems, which would be updated under action alternatives. <p>Stormwater:</p> <ul style="list-style-type: none"> All alternatives retain buffers along rivers, streams, and wetlands. LID is an innovative approach to stormwater quantity and quality control that mimics the predeveloped hydrology of a project site by using site design techniques that store, infiltrate, evaporate, and retain stormwater runoff. In 2009, the City adopted Comprehensive Plan amendments to require LID through incentives and evaluation of the Sumner Municipal Code for opportunities to facilitate LID (City Sumner 2009). All alternatives retain these goals and policies. District stormwater facilities identified in City capital plans would help accommodate development in the East Sumner Neighborhood. City investments regarding roads, wetlands, and stormwater are more defined under Alternatives 2 and 3 in the East Sumner Neighborhood Plan Update. <p>Solid Waste:</p> <ul style="list-style-type: none"> Under all alternatives, the Utilities Element of the City Comprehensive Plan provides solid waste policies related to the provision of solid waste collection and disposal 		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<p>services and supporting recycling and waste reduction programs consistent with the Solid Waste Management Plan. Alternatives 2 and 3 would update the Element policies.</p> <p>Utilities:</p> <ul style="list-style-type: none"> The <i>City of Sumner Comprehensive Plan</i> Utilities Element that guides coordination between the City and service providers. Alternatives 2 and 3 would update this element. <p>Applicable Regulations and Commitments</p> <p>Law Enforcement:</p> <ul style="list-style-type: none"> The Sumner Police department enforces various regulations of the City such as Title 9 Criminal Code, Title 10, Vehicles and Traffic <p>Fire and Emergency Medical Services:</p> <ul style="list-style-type: none"> EPF&R has adopted response time objectives and prepares regular reports. The City and EPF&R will continue to work with mutual aid partners for backup response to emergency incidents. All new development is required to meet City development regulations as well as the International Building Code and International Fire Code. National and state industry standards address fire district response times and staffing minimums (Fire Protection Association Standard 1710 and State’s Labor & Industries safety requirements (WAC 296-305-05001). <p>Libraries:</p> <ul style="list-style-type: none"> <i>Pierce County Library 2030</i> includes a capital project to more than double the Sumner Library space which would resolve future demands calculated in this SEIS. <p>Sewer:</p> <ul style="list-style-type: none"> The U.S. Environmental Protection Agency (EPA) regulates wastewater discharge under the Federal Water Pollution Control Act and the Clean Water Act. EPA administers the National Pollutant Discharge Elimination System, which requires permits for various types of discharge to streams and rivers, including treated wastewater effluent. In Washington State, EPA delegates its permitting authority to Ecology. Public sanitary sewer system operations in Washington State are regulated under Chapters 35.67 and 36.94 of the Revised Code of Washington (RCW), as well as RCW Title 57. The City manages its sewer system under Sumner Municipal Code Title 13, Public Services. <p>Schools:</p> <ul style="list-style-type: none"> The Sumner School District has established impact fees for new residential construction. The current impact fee for the Sumner School District is \$3,215 for a single-family residence and \$830 for a multifamily residential unit. <p>Water:</p> <ul style="list-style-type: none"> The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years. Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater. The City has adopted the <i>2009 Water System Plan Update</i> and <i>2010 Water System Plan Revisions</i>. Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls. 		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<p>Stormwater:</p> <ul style="list-style-type: none"> The City has adopted stormwater standards requiring, among other things, 25-year storage with the 2-year predevelopment release rate. Through Chapter 13.48 SMC, the City applies 2005 Ecology stormwater standards to new development of public and private improvements. The City states that stormwater site plans shall be prepared with a requirement for LID practices over standard retention/detention facilities. The City requires documentation of LID practices in each project subject to stormwater requirements. The City should implement the capital improvement projects described in the 2011 Stormwater Comprehensive Plan. The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program. <p>Other Potential Mitigation Measures</p> <p>City Facilities:</p> <ul style="list-style-type: none"> The City could continue to monitor space utilization for City facilities as the City grows. As utilization increases, the City should seek additional space to maintain LOS or change LOS. The City should initiate review of City facilities, growth, and demand to calibrate the analysis of space needs. <p>Fire and Emergency Medical Services:</p> <ul style="list-style-type: none"> The City could hold regular meetings with EPF&R to coordinate fire services with new growth and demand for services. EPF&R should use updated population and employment allocations and land capacity in this EIS as part of their ongoing capital facility planning process. The City and EPF&R could consider an agreement that implements impact fees for capital improvements in city limits and revises the SEPA mitigation fees to help pay for other needs and services. <p>Schools:</p> <ul style="list-style-type: none"> Consistent with City policies, the City should coordinate with the Sumner and Dieringer School Districts along with adjacent municipalities and the county to ensure timely exchange of growth information. <p>Sewer:</p> <ul style="list-style-type: none"> The City could identify additional improvements for the 20-year planning period to address deficiencies projected in the long-term. <p>Water:</p> <ul style="list-style-type: none"> The City could implement an aggressive water conservation program for residential, commercial and industrial users. The City could expand the watershed protection by acquiring additional land around the existing watershed. The City could implement an impact fee or other financial methods to finance improvements as recommended in the 2009 Water System Plan Update and 2010 Water System Plan Revisions. The City could establish a policy for new and/or existing businesses to use water at the average per capita employee level. Those not able to meet the goal should be encouraged to conserve, reuse water, or develop new sources. In conjunction with developing additional sources, the City could develop a more detailed well head and groundwater protection program. The City should continue efforts to complete the planned improvements to long-range 		

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	<p>water supply, including construction of physical source improvements, additional wells, and the acquisition of additional water rights.</p> <p>Stormwater:</p> <ul style="list-style-type: none">Subsequent to amendment of its Comprehensive Plan, the City could either conduct an update of its Stormwater Comprehensive Plan to account for the additional impervious surfaces allowed under the action alternatives or, based on its adopted stormwater regulations, the City could ensure that development allowed under land use alternatives demonstrates compliance with the standards set forth in the Ecology’s 2005 Stormwater Manual as adopted by the City.The City could fund more public education on water quality for residents and businesses.The City will be required to apply the 2012 Ecology Stormwater Manual by 2016 as part of its NPDES compliance program. The City could apply this manual in advance of 2016 in the East Sumner Neighborhood as part of the Planned Action Ordinance in the interim. <p>Utilities:</p> <ul style="list-style-type: none">Consistent with City policies, the City should provide annual updated population, employment and development projections to Puget Sound Energy so they can evaluate actual patterns and rates of growth, and compare these patterns to electrical demand forecasts.The City could coordinate and cooperate with other jurisdictions in the implementation of multi-jurisdictional electric utility facility additions and improvements.		
Parks and Recreation			
Impacts Common to All Alternatives	Increases in population would result in an increased demand for parks and recreational facilities. Impacts on these facilities would be proportionate to the amount of population increase, and each alternative would result in some LOS deficiencies if additional parks and recreation resources are not acquired.		
Impacts of Each Alternative	<ul style="list-style-type: none">Under the No Action Alternative, the City would have a deficit of several facility types, including softball fields, soccer fields, basketball courts, volleyball courts, community parks, urban trails, picnic tables, children’s play area, and regional park space, unless new park and recreation facilities are acquired.	<ul style="list-style-type: none">The Minimal Zoning Action Alternative has higher population capacity and therefore a slightly higher deficit of parks and recreation facilities than the No Action Alternative.	<ul style="list-style-type: none">Under the Assertive Collaborative Action Alternative, the City would have a slightly higher deficit of park and recreation facilities than the other Alternatives.
East Sumner Neighborhood	<ul style="list-style-type: none">Growth in East Sumner to implement the City’s vision for an urban village will increase the demand for neighborhood park facilities and	<ul style="list-style-type: none">Growth in East Sumner to implement the City’s vision for an urban village will increase the demand for neighborhood park facilities and amenities.	<ul style="list-style-type: none">The demand for park resources in the East Sumner neighborhood will increase as development occurs. However, under Alternative 3, new open space and trail

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	amenities.		amenities are planned.
Mitigation Measures	<p>Incorporated Plan Features</p> <ul style="list-style-type: none">Alternative 2 would allow new open space and trail improvements in the East Sumner Neighborhood, while Alternative 3 includes assertive action to implement these improvements in East Sumner. <p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none">The City collects a SEPA mitigation fee for parks and trails. The residential fee per dwelling unit is \$214 for parks and \$204 for trails. The commercial/industrial fee per employee is \$91 for parks and \$86 for trails. <p>Other Potential Mitigation Measures</p> <ul style="list-style-type: none">The City is in the process of updating the <i>Parks and Open Space Plan</i> to remain current for planning, design, and grant purposes. This review will include a review of the LOS standards for future growth.The City could pursue more aggressive grant and bond financing for parks and trails projects.		
Transportation			
Impacts Common to All Alternatives	<ul style="list-style-type: none">Traffic volumes increase over time under all alternatives.The three land use alternatives have relatively limited impacts on the adjacent state highways serving Sumner.Along 8th Street E the majority of the study intersections would operate at LOS F during the weekday PM peak hour under Alternatives 1, 2, and 3 without the extension of 24th Street E. The extension of 24th Street E to East Valley Highway alleviates some of the congestion along 8th Street E and improves intersection operations with all three alternatives. The 8th Street E/SR 167 interchange would continue to operate at LOS F conditions under all three alternatives both with and without the extension of 24th Street E.The 24th Street E extension results in higher traffic volumes and further degradation in intersection operations along 24th Street E, which results in a need for additional improvements at key intersections along the corridor. There would be shifts in traffic patterns with some roads experience more volumes and others less.The 64th Street E and SR 410 interchange with Sumner-Tapps Highway would have LOS F operations under all alternatives.For all of the Alternatives, in order to improve the operations of the SR 410 Westbound/166th Avenue E interchange ramp intersection without reconfiguring the westbound ramps to connect to 64th Street E, the intersection would need to be signalized and the existing northbound left-turn only lane would need to be converted to a shared left-turn/through lane or a left-turn land would need to be provided. This would provide two northbound lanes for through traffic.Intersection improvements in the East Sumner Neighborhood Plan subareas would be needed under all three alternatives. These improvements include:<ul style="list-style-type: none">Main Street/160th Avenue E – Install traffic signal, when warranted.Main Street (60th Street E) /160th Avenue E- Install traffic signal under all alternatives, when warranted. Depending on the level and pace of development in the East Sumner Neighborhood the signal would not likely be needed for many years.Main Street/Parker Avenue – Install a traffic signal under all alternatives. The intersection currently operates at LOS F during the PM peak hour so a traffic signal may be needed at this intersection in advance of signalizing Main Street (60th Street E)/160th Avenue E.		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
Impacts of Each Alternative	<ul style="list-style-type: none"> PM peak hour trips would equal 18,300 under the No Action Alternative. 	<ul style="list-style-type: none"> The additional housing and employment under Alternative 2 results in approximately 19 percent more PM peak hour trips than No Action (21,750 PM Peak hour trips for Alternative 2). The higher trip generation is primarily due to additional growth in the North Sumner and East Sumner areas. Along 24th Street E increases in traffic volumes with the degrade intersection operations as compared to the No Action (Alternative 1). The area where increases in traffic volumes impacts intersection operations the most is along Elm Street/East Valley Highway between Valley Avenue and Puyallup Street where operations are anticipated to be LOS E/F as compared to LOS D/E under the No Action (Alternative 1). 	<ul style="list-style-type: none"> The additional housing and employment under Alternative 3 results in approximately 20 percent more PM peak hour trips (21,950 PM Peak Hour trips for Alternative 3). The higher trip generation is primarily due to additional growth in the North Sumner and East Sumner areas. Along 24th Street E impacts are similar to Alternative 2. Impacts to volumes and LOS along Elm Street/East Valley Highway between Valley Avenue and Puyallup Street are similar to Alternative 2.
East Sumner Neighborhood	<ul style="list-style-type: none"> Under Alternatives 1 and 2, the intersection of Sumner-Tapps Hwy/64th Street E would need to be improved to include additional turn lanes to provided adequate capacity and to reduce the negative impacts of northbound traffic queues extending to the SR 410 interchange and eastbound traffic queues along 64th Street E. 	<ul style="list-style-type: none"> Under Alternatives 1 and 2, the intersection of Sumner-Tapps Hwy/64th Street E would need to be improved to include additional turn lanes to provided adequate capacity and to reduce the negative impacts of northbound traffic queues extending to the SR 410 interchange and eastbound traffic queues along 64th Street E. 	<ul style="list-style-type: none"> As part of Alternative 3, the City is evaluating construction of a new east-west arterial in the East Sumner Neighborhood Plan. The new arterial would be 2 to 3 lanes with the center turn lane serving property access. The evaluation shows that a traffic signal would be needed at the Sumner-Tapps Highway/62nd Street E intersection to support the anticipated growth and shift traffic from 64th Street E to use of

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
			<p>62nd Street E as the primary route.</p> <ul style="list-style-type: none"> Except for the shift in traffic from Main Street (60th Street E) to 62nd Street E there are no major changes in traffic volumes that result from construction of the new arterial.
Mitigation Measures	<p>Incorporated Plan Features</p> <ul style="list-style-type: none"> All Alternatives would implement Transportation Element policies that address circulation system classification and design, concurrency standards, transit coordination and improvements, non-motorized facilities, financing including impact fees, and joint transportation planning, among other policies. Alternatives 2 and 3 include transportation improvements in the East Sumner Neighborhood. Alternative 3, due to the significant investment in transportation infrastructure, would result in development consistent with the Urban Village Designation and vision for a compact, walkable, and mixed-use development pattern that provides a variety of transportation options. The City has significant capacity for new employment and housing growth in the City. The combination of housing and employment capacity allows for people to live in proximity to where they work. The proximity of employment and housing allows for shorter travel distances, greater transportation options, and mixed-use development that maximizes the efficient use of land. <p>Applicable Regulations and Commitments</p> <ul style="list-style-type: none"> SMC Chapter 12.36 addresses Transportation Impact Fees. This ordinance will be updated to require concurrency of improvements at the time of development or within six years. The City implements Chapter 16.06 Commute Trip Reduction. The Transportation Plan Update will expand on Transportation Demand Management Measures. The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places. The City collects mitigation fees for trails (see Section 3.10). <p>Other Potential Mitigation Measures</p> <ul style="list-style-type: none"> The Transportation Plan Update provides a comprehensive list of improvement projects and programs to meet the existing forecast transportation needs of the City are provided, covering roadways, transit, and non-motorized improvements and programs. 		

Source: BERK Consulting, 2014

1.7 Significant Unavoidable Adverse Impacts

Earth

Since the majority of the City is within seismic and volcanic hazard areas, any development within these areas poses an increased risk to structures and the people living or working in them. Implementing current building codes and critical areas regulations will reduce potential risks or allow for notification of potential hazard areas.

Flooding

All new development within the effective base flood elevations would increase current flood elevations through the placement of fill and reduction of flood storage. This could increase the area affected by floods and/or the time it takes for flood waters to recede. Implementation of the City's flood hazard regulations, Shoreline Master Program, procedures to comply with the Biological Opinion, proposed zero rise policy and habitat enhancement and flood hazard mitigation projects would reduce impacts. Requirements for monitoring and periodic hydrologic modeling as well as enforcement of regulations should allow the City to adaptively manage floodplain development.

Plants and Animals

All future development would likely have some impact, direct or indirect, to local plants and animals. However, the plan area development and infrastructure improvements proposed under all alternatives are within areas that have been previously disturbed by agricultural activity or are otherwise in areas of low quality habitat. Due to restrictions placed on certain properties the White River buffer by the Biological Opinions and City regulation, no significant adverse impacts are anticipated.

Water Quality

Direct impacts would be minimized to less than significant through the implementation of federal, state, and City regulations, including critical area and stormwater regulations. Though alternative 3 proposes a considerable amount of new development, it is less than one hundredth of a percent of the White River watershed and would be insignificant. The alternative also proposes to establish a new wetland mitigation bank which would provide improved stormwater treatment and flow control for the region. LID techniques will be implemented into the design as much as possible.

Air Quality and Greenhouse Gases (GHGs)

No significant unavoidable adverse impacts on regional or local air quality are anticipated for any of the three action alternatives. 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.

Land Use

All alternatives result in new construction to accommodate population and employment growth. New construction will result in changes of use and the characteristics of parcels of land, including potential demolition and displacement. These impacts could be mitigated by development regulations including design review and buffer requirements.

Population, Employment, and Housing

Population, housing and employment would increase under the alternatives, although the location of residential and employment growth and the extent of that growth would vary by alternative. Additional population growth would increase the demand for housing. Additional population and employment growth would result in secondary impacts on the natural and built environment and on the demand for public services. These impacts are addressed in other sections of this document.

The number of housing units would increase under all alternatives to differing degrees. Additional population growth anticipated under all alternatives would increase the demand for housing and may impact housing affordability, which can be mitigated with affordable housing policies and incentives. The need for affordable housing would increase as well. Additional population and housing growth would result in secondary impacts on the natural and built environment and on the demand for public services. These impacts are addressed in other sections of this document.

Plans and Policies

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

Public Services, Capital Facilities, and Utilities

- City Facilities: With identified mitigation measures, no significant unavoidable adverse impacts are anticipated under any of the alternatives.
- Law Enforcement: Future population growth and development will continue to increase the need for police services and facilities under all alternatives. Regular capital facility and staffing need planning can minimize impacts and meet future demand.
- Fire and Emergency Medical Services: Future population growth and development will continue to increase the need for fire services and facilities under all alternatives. Regular capital facility and staffing planning can minimize impacts and meet future demand.
- Libraries: Under each Alternative, future population growth and development will continue to increase the need and demand for public services such as libraries. Coordination with service providers and regular review of capital plans by the City, school districts, and the Pierce County Library District will help avoid impacts.
- Schools: Under each Alternative, future population growth and development will continue to increase the need and demand for schools. Coordination with service providers and regular review of capital plans by the City and school districts will help avoid impacts.
- Sewer: Additional population, employment, and industrial/commercial growth throughout the City's service area would result in increased demands on sanitary sewer facilities. Advanced sewer system planning and capital facility planning should minimize the possibility of unavoidable impacts.
- Water: Future growth in the City of Sumner and its UGA will lead to increased demand for water services, though water reuse and recycling or demand management measures could partially reduce the need for additional water supply. With the implementation of the City's planned improvements to water source capacity, no significant unavoidable adverse impacts would occur.
- Stormwater: Increased development under all alternatives would increase impervious surface and reduce vegetation. These changes would have impacts on the stormwater system in the study area and the natural recharge of groundwater. Aggressive implementation of LID measures and application of NPDES-compliant stormwater standards and improvements would reduce impacts and meet City level of service standards.
- Solid Waste: As population growth occurs, the amount of solid waste generated will increase, resulting in increased demand on the County's disposal system. Unavoidable impacts are not anticipated due to the countywide coordination of solid waste and recycling programs.
- Utilities: Additional population and employment growth will increase the demand for electricity, natural gas, and telecommunication services. The City's coordination with service providers along with mitigation measures should allow for increased demand to be met. Significant, unavoidable or adverse impacts are not anticipated.

Parks and Recreation

Anticipated growth under all the plan alternatives will increase the demand for recreational facilities in the City of Sumner and impact the City's ability to meet the established LOS standards. The City will need to implement the identified mitigation measures to ensure adequate park and recreation facilities to serve the City of Sumner.

Transportation

Increases in future development will result in increased traffic volumes. Although congestion can be addressed through the mitigation measures presented in this document, the increase in traffic itself is considered a significant unavoidable adverse impact.

2.0 ALTERNATIVES

2.1 Purpose of the Proposal

This chapter describes the proposal to amend and update the City of Sumner Comprehensive Plan and East Sumner Neighborhood Plan (proposal) and the alternatives to achieve the proposal that are studied in this Draft Supplemental Environmental Impact Statement (Draft SEIS).

2.2 Proposal

The City of Sumner will be updating its Comprehensive Plan and East Sumner Neighborhood Plan by June 30, 2015 in accordance with the Growth Management Act (GMA). The Update includes the following:

- Revise City Comprehensive Plan Elements and development regulations to address growth during the 2015-2035 planning period, land use plan and zoning changes, to accommodate growth targets for population, housing and employment, transportation and capital facilities plans, and housekeeping and consistency amendments.
- Amend and update comprehensive plan elements to ensure consistency with the City's review of its plans in light of state and regional plans, GMA requirements as well as community vision and needs.
- Update Critical Area, Subdivision, Zoning and Development Regulations for consistency with the Comprehensive Plan.
- Update the East Sumner Neighborhood Plan with new zoning regulations, wetland mitigation proposals, road improvements, pedestrian and bicycle paths and other improvements. The actions increase land capacity and alter current transportation plan improvements.
- Consider application of SEPA tools to promote the vision of mixed use growth in East Sumner, such as a mixed use and residential infill exemption (RCW 43.21C.229), or a planned action (RCW 43.21C.440; WAC 197-11-164 to 172) where development that meets City codes and performance standards would have a streamlined SEPA process and rely on the EIS rather than require a new threshold determination. A draft planned action ordinance is provided for consideration by the City.

Growth Management Act and the City of Sumner Comprehensive Plan

GMA was adopted by the 1990 Washington State Legislature and amended periodically thereafter. GMA contains a comprehensive framework for managing growth and development in local jurisdictions. Pierce County and all cities within it, including the City of Sumner, are subject to the requirements of GMA. Comprehensive plans for all cities planning under GMA must include elements for land use (including a land use map), housing, transportation, capital facilities, economic development, parks and recreation, and utilities. In addition, a community shoreline master program is considered an element of the comprehensive plan and a part of development regulations.

Each city must plan to accommodate a share of projected regional growth; and its comprehensive plan must ensure that existing and planned infrastructure can support planned growth at a locally acceptable level of service.

The City Comprehensive Plan includes the following elements consistent with GMA:

- Land Use, including the following sub-elements
 - Land Use

SUMNER COMPREHENSIVE PLAN UPDATE SEIS ALTERNATIVES

- Cultural Resources
- Essential Public Facilities
- Commuter Rail/Regional Transit
- Permit Process
- Plan Monitoring and Amendment
- Governance
- Economic Development
- Community Character
- Parks and Open Space
- Environment
- Housing
- Transportation
- Capital Facilities and Public Services
- Utilities
- Family and Human Services
- Shoreline

Development regulations must also be consistent with the adopted comprehensive plan. The City Comprehensive Plan elements are supported by the development regulations in the Sumner Municipal Code, including, but not limited to, zoning, subdivision, critical areas and transportation concurrency.

The alternatives described in this chapter would modify elements of the City Comprehensive Plan and development regulations to achieve the proposal.

Public Involvement

The Sumner City Council adopted a Comprehensive Plan in compliance with the Washington State Growth Management Act (GMA) on April 4, 1994. The Comprehensive Plan was updated significantly in 2004 and again in 2010 and has been amended almost annually. Each plan update process included extensive opportunities for public involvement both in plan development and as part of the public involvement and notice provisions required for compliance with SEPA.

The City is preparing to undertake the required 2015 Comprehensive Plan Update as required by the GMA. Staff has completed the *Periodic Update Checklist for Cities Updated June 2013*, several public workshops seeking the public's thoughts on what is needed for the future, and a Community Survey. Feedback from the public involvement process influenced development of the proposal being analyzed as part of the SEIS process.

Growth Allocations, Land Use Capacity, and Efficient Use of Land

The City Comprehensive Plan is required by GMA to accommodate the forecasted population and employment for the community. The City's allocations for population, dwelling units, and jobs are the result of a multi-jurisdictional, regional process to determine how each city is able to accommodate its fair share of future regional growth. Currently, the City Comprehensive Plan is based on a horizon year of and growth allocation to 2030; however, GMA requires a 20-year plan which for the City would extend from 2015-2035.

Exhibit 2-1 identifies the city and UGA current (2010) and future (2030 targets and 2035 planning) allocations. The City is projected to increase its growth between 2030 and 2035, as shown in the “total” columns below.

Exhibit 2-1. Growth Allocations for Current Plan Area (City Limits and UGA)

Demographic	Base Year (2010)		Allocations (2010–Horizon Year)				Land Capacity (No Action)	
	City	UGA	2030 City	2030 UGA	2035 City	2035 UGA	City	UGA
Population Gross	9,451	1,112	11,970	2,020	12,570	3,394	13,184	3,394
Population Net			2,519	908	3,119	2,282	3,733	2,282
Housing Units Gross	4,279	509	5,743	925	6,093	1,554	5,988	1,554
Housing Units Net			1,464	416	1,814	1,045	1,709	1,045
Employment Gross	9,316	68	19,599	144	21,762	346	21,909	346
Employment Net			10,283	76	12,446	278	12,593	278

Population applies a 2035 household size of 2.18 based on PSRC LUT Workbook (2014) for Sumner.
2010 figures based on buildable lands database for City and UGA.

Source: BERK Consulting 2014

Land use capacity is the measure used to determine the ability of the City to accommodate its population allocation and, secondarily, its employment allocation. The capacity analysis is based on the *Pierce County Buildable Lands Report* (Pierce County 2014) with some local adjustments. The assumptions address redevelopment, densities, market factors, critical areas, rights-of-way, as well as other issues. Capacity calculations are conducted to 1) verify that enough land is available for the City to accommodate its regional population and employment allocations and 2) provide input into the City traffic model for level of service estimates (Appendix B).

An additional component of the land capacity analysis process is to review of whether the densities assumed (planned) by the analysis are consistent with observed trends (what has been built). The City meets its 2030 population and housing targets per the Countywide Planning Policies, and was found as of 2010 to have a small employment deficiency; however, in 2014 the City adopted M-1 Comprehensive Plan Land Use designation for the Sumner Meadows property and it was surplus for employment uses. Therefore, the City’s employment capacity increased and the City meets its 2030 targets. By 2035, the City meets population and employment targets but not housing targets. In Section 3.8, “Relationship to Plans and Policies,” the ability of Action Alternatives to meet 2035 growth estimates is addressed.

Efficient Use of Land

The City’s vision, plans, policies, and regulations have led to the establishment of a community with clearly defined centers, housing choices, and a strong employment base. The City Comprehensive Plan has been established and amended over time to create an efficient land use pattern served by capital facilities and services, as follows:

1994 Comprehensive Plan Update. The 1994 Comprehensive Plan Update identified a centers concept for pedestrian-oriented development in proximity to services, and a range of housing choices including single-family housing on a variety of lot sizes, townhomes, flats, and other forms. The plan anticipated multiple modes of travel including a new commuter rail station and pedestrian and bicycle facilities as well as road improvements. Consistent with prior City plans, an employment center in the northern valley was anticipated. The plan has been amended through the annual docket process, but its vision and approach for a complete community that meets the needs of current and future Sumner residents and businesses remains.

East Sumner Subarea Plan (2001). This plan established an Urban Village land use designation and a mix of uses providing additional housing densities and choices in proximity to commercial and service uses in the eastern portion of the city limits. The land use pattern was amended in 2004 to add a new small-lot single-family density (LDR-4) allowing 4,000–square-foot lots. This plan is under review and revision with the 2015 Comprehensive Plan Update.

Town Center Plan (2005). This plan reinforced the role of Sumner’s downtown as the center for business to be further supported by mixed use and housing choices in proximity to the commuter rail station. This area has the highest planned densities in the city limits, given the availability of commerce, transit, and other amenities. Some elements of this plan, the PMUD at the Fleishmann property, and condominium provisions are under review with the 2015 Comprehensive Plan update.

Manufacturing-Industrial Center (MIC, 2009/2010). The City amended its Comprehensive Plan and development regulations to reinforce and improve the Sumner-Pacific industrial area. Designation as a regional center requires that the area meet certain employment densities. This designation prioritizes these areas for state and federal transportation funds and promotes a strengthened sense of aesthetics together with enhanced environmental stewardship. The MIC overlay is proposed to be extended to the Sumner Meadows and Fleishmann’s sites in the 2015 Comprehensive Plan Update.

Comprehensive Plan Update and EIS (2010). In 2010 the City updated the comprehensive plan that included amendments to the UGA boundary expansion in the Orton Junction area and a reduction in East Hill. The 2010 UGA amendments were approved by Pierce County but challenged in front of the Growth Management Hearings Board and found to be inconsistent with the provisions of the Growth Management Act. The City appealed the decision, and later withdrew its appeal. Effectively, the UGA modification approvals were made null by Pierce County, restoring the pre-2010 UGA boundaries. The update also included review of three docket requests, amendments to the comprehensive plan, land use plan and zoning to address plan horizon and other housekeeping and consistency amendments.

Annual Dockets, including 2013 Sumner Meadows Amendments. The City annually considers a docket of amendments allowing the City and property owners to request changes to land use and zoning or policies and regulations. In 2014, the City approved its 2013 Docket to amend the Comprehensive Plan land use map to allow light industrial uses on the former Sumner Meadows Golf Course and remove mixed uses on adjacent properties to also be light industrial.

The City has accomplished its planning for the current plan area (city limits and UGA) with essentially the same boundaries since 1994. With a new 20-year planning horizon and proposed growth allocations, the City is once again considering logical growth patterns and boundaries. This Draft SEIS studies alternative patterns and boundaries.

2.3 Environmental Review

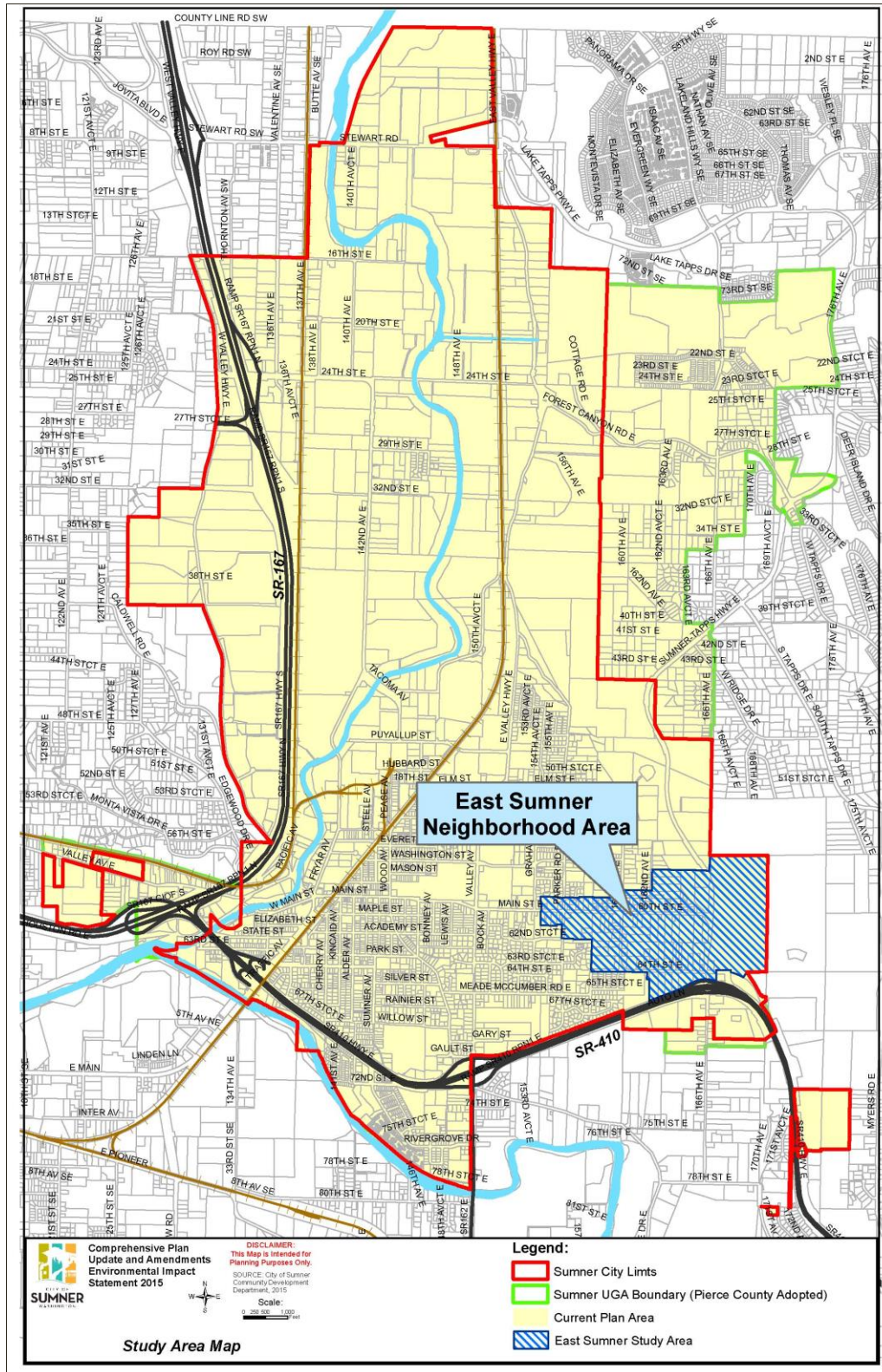
The purpose of this Draft SEIS is to assist the public and local government decision makers in considering future growth and land use patterns as well as goals, policies, and development regulations as part of the Sumner comprehensive plan update. These broad decisions will provide direction and support for more specific actions by the City, such as capital improvements and implementing regulations.

This section describes the study area, scope, and level of analysis addressed in this Draft SEIS.

Study Area

For the purposes of this Draft SEIS, the study area consists of the area within the city limits and current UGA boundary, referred to herein as the study area. The changes studied in 2010 to reduce Sumner’s eastern UGA boundary and to expand to the south into Orton Junction, are eliminated as the modifications were not approved by the Growth Management Hearings Board, and the amendments did not go into effect by Pierce County.

Exhibit 2-2. Study Area



Source: City of Sumner 2015

Scope of Review

SEPA (Revised Code of Washington [RCW] 43.21C) requires government officials to review the environmental consequences of a proposal before implementing it, and to consider better or less damaging ways of accomplishing it. The officials must consider whether a proposal would have a probable significant adverse environmental impact on the following elements of the natural and built environment: natural environment (including earth, flooding, water quality, and plants and animals); air quality and greenhouse gas (GHG); land use; population, employment and housing; relationship to plans and policies; transportation; and public services, capital facilities and utilities.

While scoping is optional for a SEIS, as part of public outreach for the Comprehensive Plan and East Sumner Neighborhood Plan Update, the City issued a Determination of Significance and Scoping Notice on August 8, 2014. This notice initiated a 21-day public comment period, which closed on August 29, 2014 (Appendix A). The City also held a scoping meeting on August 19, 2014. The City published the notice in the newspaper and mailed notices to property owners in East Sumner Neighborhood. See Appendix A. Local and state agencies on the City's SEPA mailing list and adjacent jurisdictions were also notified. A summary of the August 19, 2014 meeting is included in Appendix A, and focuses on the East Sumner Neighborhood alternatives; no other scoping comments were received. The City voluntarily published a notice of revised scope to indicate updated features of the proposal on December 5, 2014, as described in Appendix A.

Level of Analysis

Nonproject Environmental Analysis

This Draft SEIS provides a qualitative and quantitative analysis of environmental impacts as appropriate to the general nature of a comprehensive plan update. The adoption of comprehensive plans 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 single site-specific project and involves decisions on policies, plans, and programs. An EIS for a nonproject proposal does not require site-specific analyses; instead, the EIS discusses impacts and alternatives appropriate to the scope of the nonproject proposal and to the level of planning for the proposal (Washington Administrative Code [WAC] 197-11-442).

Phased Review

SEPA encourages the use of phased environmental review to focus on issues that are ready for decision and to exclude from consideration issues already decided or not yet ready for decision making (WAC 197-11-060(5)). Phased review is appropriate where the sequence of a proposal is from a programmatic document, such as an EIS addressing a comprehensive plan, to documents that are narrower in scope, such as those prepared for site-specific, project-level analysis. The City is using phased review in its environmental review of the City Comprehensive Plan update with a programmatic review of the proposal and alternatives. Examples of proposals that may require more area-specific or site-specific SEPA review when more details are known include, but are not limited to, capital improvement projects and private development applications. See discussion below of tools that would be applied in East Sumner that would allow expedited upfront SEPA review as an alternative to phased review.

SEPA-GMA Integration

The City plans for population and employment forecasts and maintains a comprehensive plan, which it updates periodically to reflect new laws and changed local conditions. SEPA requires environmental review of legislative actions such as a comprehensive plan update.

The planning processes for SEPA and GMA come together at several points:

- **Public participation.** Both SEPA and GMA recognize public participation and governmental agency coordination as critical to the planning process.

- **Documents.** Both SEPA and GMA require preparation of documents for the public participation and decision-making process, but they each have specific guidelines on the information and analysis that must or should be included.
- **Existing conditions.** Both SEPA and GMA require collection and analysis of information regarding existing conditions.
- **Goals, objectives, and policies.** Planning goals, objectives, and policies play an important role in the development of a GMA comprehensive plan and the SEPA evaluation of plan alternatives. SEPA mitigation measures can also contribute to policy amendments in the GMA documents.
- **Impact analysis.** GMA requires collection and analysis of data for critical areas and comprehensive plan topics (e.g., land use, transportation, utilities, and capital facilities). SEPA requires analysis of significant adverse impacts on elements of the natural and built environment that are identified during scoping.
- **Mitigation.** GMA requires strategies to reduce the impacts of growth on the natural and built environment. The same strategies should satisfy SEPA requirements for identifying ways to mitigate the significant adverse impacts identified during environmental review.

WAC 197-11-210 authorizes counties and cities planning under GMA to integrate the requirements of SEPA and GMA. The goal is to ensure that environmental analysis under SEPA occurs concurrently with, and as an integral part of, the planning and decision-making process under GMA. At a minimum, environmental analysis at each stage of the GMA planning process should address impacts associated with planning decisions. Impacts associated with later planning stages can also be addressed. Analysis of environmental impacts in the GMA planning process can result in better-informed GMA planning decisions; avoid delays, duplication, and paperwork in future project-level environmental analyses; and narrow the scope of environmental review and mitigation under SEPA at the future project level.

GMA jurisdictions are authorized, but not required, to combine SEPA and GMA processes and/or to integrate documents. In either case, WAC 197-11-228 states that the appropriate scope and level of detail of environmental review should be tailored to the GMA proposal under consideration; jurisdictions may modify SEPA phased review as necessary to track the phasing of GMA actions; and the process of integrating SEPA and GMA should begin at the early stages of plan development.

The City has elected to integrate SEPA and GMA in both the process and the document. Integration of the environmental analysis with the planning process informs the preparation of GMA comprehensive plan amendments and facilitates coordination of public involvement activities. The information contained in this Draft SEIS will assist the City in refining a preferred alternative, related comprehensive plan amendments, and implementing regulations.

The integrated Comprehensive Plan/Draft SEIS document is structured as shown in Exhibit 2-3. This Draft EIS comprises Volume II of the integrated document.

Exhibit 2-3. Sumner Integrated SEPA/GMA Plan and EIS

Volume	Contents
Volume I: Sumner Comprehensive Plan—A Policy Document	<ul style="list-style-type: none">• Summarizes the key issues identified in Volume II.• Contains all policies and plans.
Volume II: Supplemental Environmental Impact Statement	<ul style="list-style-type: none">• Contains all inventories required by GMA and SEPA in the “Affected Environment” discussions.• Analyzes the proposal and alternatives.• Summarizes the comprehensive plan policies and adopted regulations that serve as mitigation measures.

Source: BERK Consulting 2014

This Draft SEIS supplements and supersedes the 2010 EIS, prepared for the current City Comprehensive Plan, and will support the City Comprehensive Plan as it may be amended through this update process.

Proposed Comprehensive Plan, associated Transportation and Capital Facility Plans, and East Sumner Neighborhood Plan amendments are available under separate cover but are issued for comment in coordination with this Draft SEIS.

Future Use of this Document

The analysis in this Draft SEIS will be used to review the environmental impacts of the City Comprehensive Plan update/amendment proposal and alternatives, including proposed development regulations. Additional environmental review will occur as other project or nonproject actions are proposed to the City in the future. This approach will result in an additional incremental level of review when subsequent implementing actions require a more detailed evaluation and as additional information becomes available. In this case, subsequent phases of environmental review may consider proposals that implement the City Comprehensive Plan, such as land use regulations, specific development proposals, or other similar actions. Future environmental review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance (DNSs).

An agency may use previously prepared environmental documents to evaluate proposed actions, alternatives, or environmental impacts. The proposals may be the same as or different than those analyzed in the existing documents (WAC 197-11-600[2]). See discussion below of tools that would be applied in East Sumner that would allow expedited SEPA review as an alternative to future incremental review.

SEPA Tools – East Sumner

The City of Sumner is considering application of one of two SEPA tools in East Sumner that facilitate environmental review of proposals that are consistent with City plans and regulations and the mitigation measures of this SEIS – a planned action or an infill exemption. Each is described below.

Planned Action Ordinance (PAO): A planned action provides more detailed environmental analysis during the early formulation stages of planning proposals rather than at the project permit review stage. Future development proposals consistent with the planned action ordinance do not have to undergo an environmental threshold determination, and are not subject to SEPA appeals when consistent with the planned action ordinance including specified mitigation measures. Planned actions still need to meet the City's development regulations and to obtain necessary permits.

According to the SEPA law and rules, a planned action is defined as a project that has the following characteristics:

1. Is designated a planned action by ordinance or resolution adopted by a GMA county/city;
2. Has had significant environmental impacts addressed in an EIS, though some analysis can be deferred at the project level pursuant to certain criteria specified in the law;
3. Has been prepared in conjunction with a comprehensive plan, subarea plan, a fully contained community, a master planned resort, master planned development, a phased project, or in conjunction with subsequent / implementing projects;
4. Is located within an urban growth area;
5. Is not an essential public facility, as defined in RCW 12.36.70A.200, unless an essential public facility is accessory to or part of a residential, office, school, commercial, recreational, service, or industrial development that is designated a planned action; and
6. Is consistent with a comprehensive plan or subarea plan adopted under GMA.

The jurisdiction must include a definition of the types of development included, but has options to limit the boundaries and to establish a time period during which the planned action will be effective.

Review of a planned action is intended to be simpler and more focused than for other projects. If the PAO is adopted, the City would follow the applicable procedures contained in the ordinance to determine if the proposed project impacts are consistent with the EIS. When a permit application and environmental checklist are submitted for a project that is being proposed as a planned action project, the City must first verify the following:

- The project meets the description of any project(s) designated as a planned action by ordinance or resolution.
- The probable significant adverse environmental impacts were adequately addressed in the EIS.
- The project includes any conditions or mitigation measures outlined in the ordinance or resolution.

If the project meets the above requirements, the project qualifies as a planned action project and a SEPA threshold determination is not required. However, City actions (i.e., the permit process) are still applicable.

Appendix C contains a draft of the PAO applicable to East Sumner Action Alternatives 2 and 3 including the information on the draft process and the parameters used to determine consistency with EIS assumptions.

Residential Mixed Use/Infill Exemption: Cities or counties that are subject to GMA can use an EIS prepared for their comprehensive plan or subarea plans, to establish an exemption for residential, mixed-use, or commercial (non-retail) projects. Based on SEPA (RCW 43.21C.229) the exemption must be limited to new residential or mixed-use development within a designated urban growth area where the existing “density and intensity of use is lower than called for in the goals and policies of the applicable comprehensive plan.” This tool can be prepared at a broader programmatic level of detail. Because it is an exemption, the agency should be confident, based on sufficient code requirements, that it does not need its SEPA authority to condition the proposal. However, where it is found appropriate, the exemption can streamline permitting by requiring less information from the project applicant; for example, a SEPA threshold determination would not be required for an exempt development.

The SEPA Handbook (Washington State Department of Ecology [Ecology] 2003) recommends the following process to establish the exemption presented in summary form:

1. Identify the density and intensity goals specified in the adopted comprehensive plan for residential and mixed-use development.
2. Evaluate recent residential and/or mixed-use projects to identify a specific area(s) where the density/intensity goals in the comprehensive plan are not being met.
3. If review of the recent development indicates the density or intensity goals are not being met, identify the development level needed to meet the goals within the selected area.
4. Evaluate the EIS prepared for the comprehensive plan and determine if the density and intensity goals have been adequately analyzed.
5. Draft a proposed categorical exemption. The exemption should clearly indicate:
 - a. The level of residential or mixed-use development that will be exempt,
 - b. The area where the exemption will apply, and
 - c. How the exemption will be applied to a proposed project.
6. Complete SEPA environmental review for the proposed categorical exemption.
7. Invite the public to comment on the proposed exemption.
8. Amend the agency’s SEPA procedures ordinance to include the new categorical exemption. Send a copy of the new exemption(s) to Ecology.

It should be noted that the exemption does not apply when City rules do not allow exemptions, such as lands covered by water (WAC 197-11-800(2)) or where proposals include utility improvements in excess of other SEPA exemptions for utility lines. If prepared, an infill exemption ordinance applicable to East Sumner Action Alternatives 2 and 3 would be an option to the PAO including parameters for determining consistency with EIS assumptions.

Prior Environmental Review

The City has issued the following SEPA documents related to its comprehensive plan over the last 20 years:

- The *Final Environmental Impact Statement—Sumner Comprehensive Plan Update* (for the first update to the original comprehensive plan) was issued on December 22, 1993, to address the Sumner Planning Area including a range of UGA alternatives south of State Route (SR) 410. The EIS was prepared as part of an integrated process with the GMA comprehensive plan.
- The *East Sumner Neighborhood Plan Integrated Final Supplemental Environmental Impact Statement and Subarea Plan*, on March 14, 2001, to address a particular neighborhood within the city limits.
- The *Final Environmental Impact Statement for City of Sumner Comprehensive Plan Update 2004* was issued on June 30, 2005, to address an update of the comprehensive plan to horizon year 2022.
- The *Final Environmental Impact Statement for City of Sumner Comprehensive Plan Update 2010* was issued on November 24, 2010, to address an update of the comprehensive plan to horizon year 2030.
 - The 2010 Final EIS is being supplemented by this *2015 Sumner Comprehensive Plan Update and related documents SEIS*.
- The Fleishmann’s Industrial Park, LLC Manufacturing/Industrial Center (MIC) Overlay Expansion Final SEIS issued on February 29, 2012.
- The *City of Sumner 2013 Comprehensive Plan Annual Amendments Sumner Meadows Docket Final SEIS*, issued July 25, 2014.

In addition to EISs, the City has prepared an addendum to the Final EIS for its Manufacturing/Industrial Center designation, which was issued May 14, 2009. The City has issued other addenda for annual comprehensive plan amendments as appropriate to the nature of the requests.

These environmental review documents have been considered in the preparation of this Draft SEIS.

2.4 Alternatives

The three alternatives described below include Alternative 1 No Action Alternative and two action alternatives—Alternative 2 Minimal Action Rezoning and Alternative 3 Assertive Collaborative Action.

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:

- Accommodate the City’s fair share of population and employment forecasts to meet GMA requirements and the City vision.
- Reinforce Sumner’s role as a job center serving south King County and east Pierce County. Provide a variety of employment opportunities and commercial services for the community.
- Provide a range of housing types in the community in an efficient pattern that also recognizes environmental constraints and community character.
- Protect ecological conditions and functions and values of critical areas.
- Facilitate mixed-use development in the Town Center and East Sumner neighborhoods.

- Provide multimodal improvements to support the land use vision.
- Provide capital facilities and services at levels of service that meet community needs and the City's fiscal capacity.
- Consider location-specific amendment requests consistent with the annual comprehensive plan review cycle.
- Ensure that the comprehensive plan and development regulations are consistent with a new horizon year and desired growth patterns.

The degree to which each alternative accomplishes the objectives is addressed in this Draft EIS, particularly in Section 3.9, "Relationship to Plans and Policies."

Alternative 1. No Action Alternative

For the purpose of this analysis, the No Action Alternative represents the continuation of the City's current Comprehensive Plan (adopted April 1994, with updates through 2014). No GMA policy and code updates would be made. No land use or zoning map amendments would occur. The present 2030 horizon would remain in the plan.

This alternative would result in surplus capacity for year 2030 population, housing, and jobs allocation, surplus 2035 capacity for population and employment, and a deficit for the proposed 2035 housing allocation. See Exhibit 2-4.

Exhibit 2-4. Allocations and Land Capacity – Alternative 1 No Action

Demographic	Base Year (2010)		Allocations (2010–Horizon Year)				Land Capacity			
	2010 City	2010 UGA	2030 City	2030 UGA	2035 City	2035 UGA	Land Capacity: City	Difference: City Target	Land Capacity: UGA	Difference: UGA Target
Population Gross	9,451	1,112	11,970	2,020	12,570	3,394	13,184	614	3,394	0
Population Net			2,519	908	3,119	2,282				
Housing Units Gross	4,279	509	5,743	925	6,093	1,554	5,988	(105)	1,554	0
Housing Units Net			1,464	416	1,814	1,045				
Employment Gross	9,316	68	19,599	144	21,762	346	21,909	147	346	0
Employment Net			10,283	76	12,446	278				

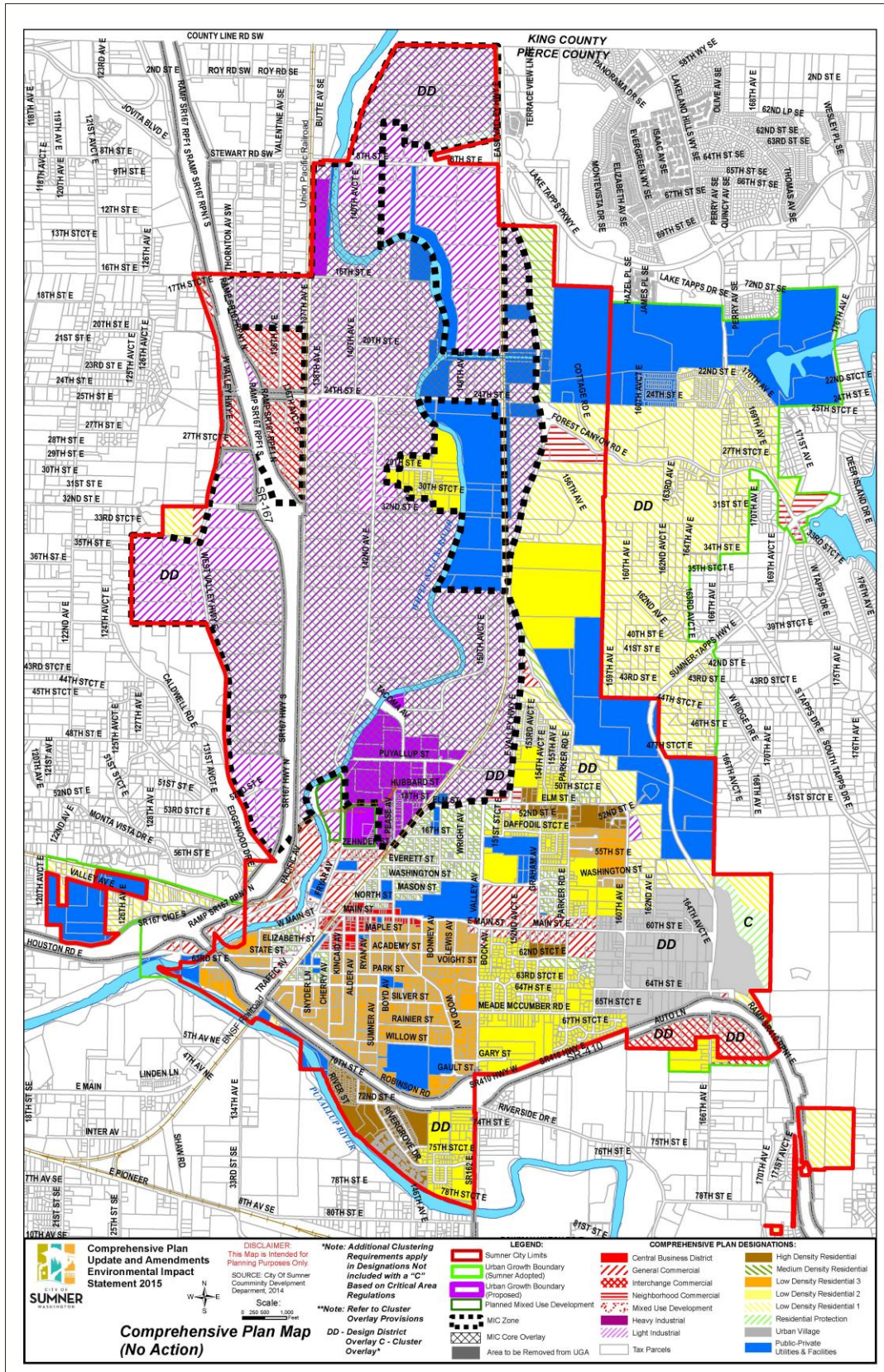
Source: BERK Consulting 2014

Exhibit 2-5 depicts Comprehensive Plan land use designations under the No Action Alternative; Exhibit 2-6 illustrates the corresponding zoning.

The No Action Alternative includes the following:

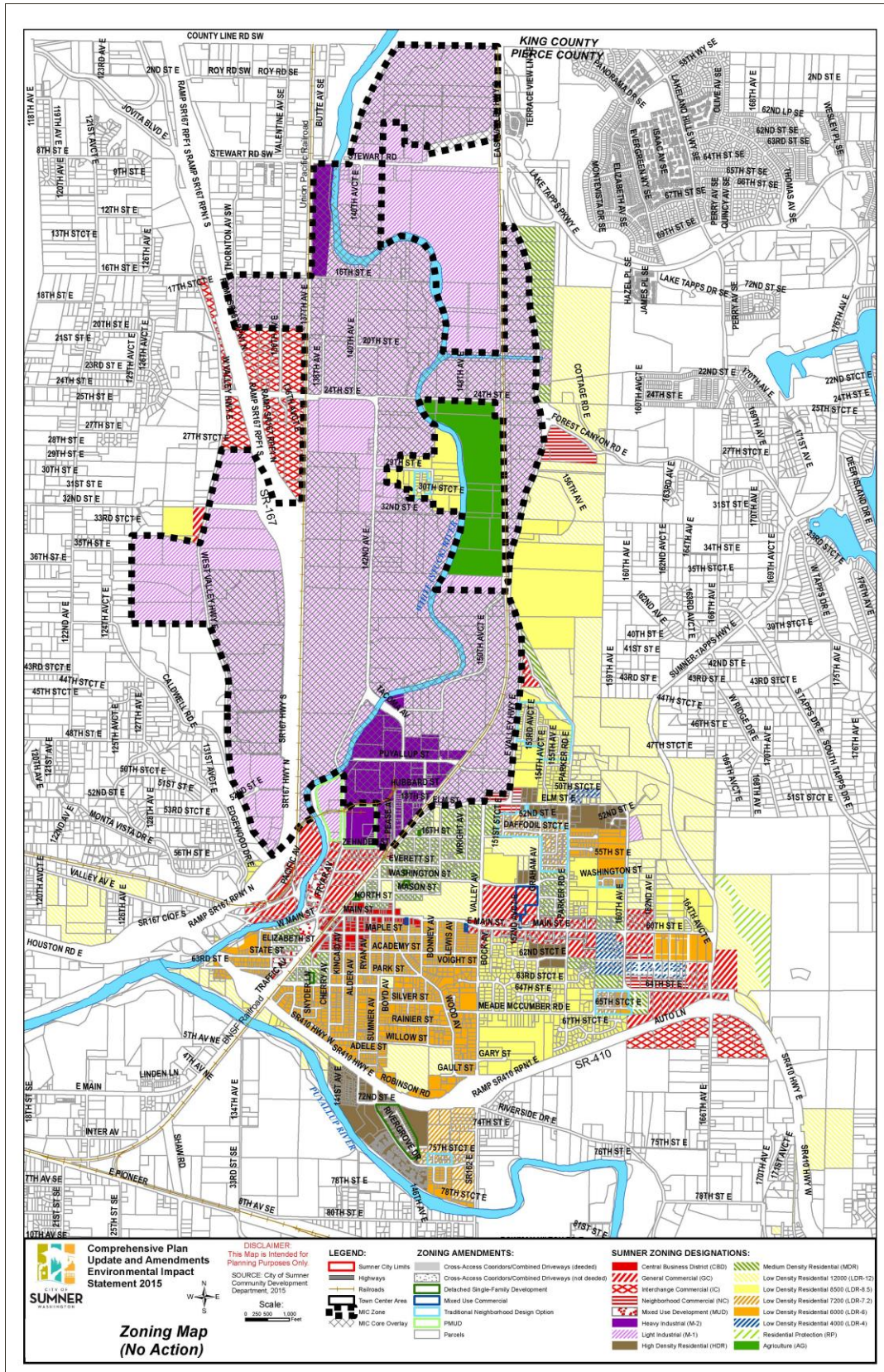
- Future Land Use and zoning consistent with 2010 No Action Future Land Use in the City Limits and Urban Service Area/Urban Service Area; and
- Sumner Meadows Golf Course Alternative 2 establishing a Light Industrial designation and M-1 zoning along Stewart Road and Golf Course as approved in 2014.

Exhibit 2-5. Alternative 1 No Action: Existing Comprehensive Plan



Source: City of Sumner 2015

Exhibit 2-6. Alternative 1 No Action: Existing Zoning



Source: City of Sumner 2015

Alternative 2. Minimal Rezoning Action

The Minimal Zoning Action Alternative includes the items in the No Action Alternative plus the following (see Exhibit 2-8, Exhibit 2-9, and Exhibit 2-10):

- East Sumner Neighborhood Plan: Implement the Minimal Action (Rezoning) Alternative (Summarized further below).
- Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue.
- Retain Medium Density Residential (MDR) along the East Valley Highway.
- Increase buildable land units in Town Center by 25% (net increase of 58 units above No Action) due to elimination of the condominium requirement for multi-family around the train station and amendments to parking standards in the Town Center to promote development.
- Assume a job mix in the City that recognizes trends based on Puget Sound Regional Council's Land Use Targets Workbook showing a more intense employment density.
- Amend the Manufacturing/Industrial Center boundary to include the former Sumner Meadows Golf Course.
- Remove PMUD overlay from Fleischmann's property and include it in the MIC.
- Remove Design Districts designations.
- Amend Private Public Utility Facility designations on former Cascade Water Alliance property that has been surplus, etc.
- Retain "Joint Planning Area" as a future southern expansion to keep in policy and the Plan for future reference, and describe in policy what is meant by this area.
- Implement SEPA Tools– East Sumner, with either a Planned Action or Infill Exemption.
- Update Critical Area, Subdivision, Zoning and Development Regulations for consistency with the Comprehensive Plan.

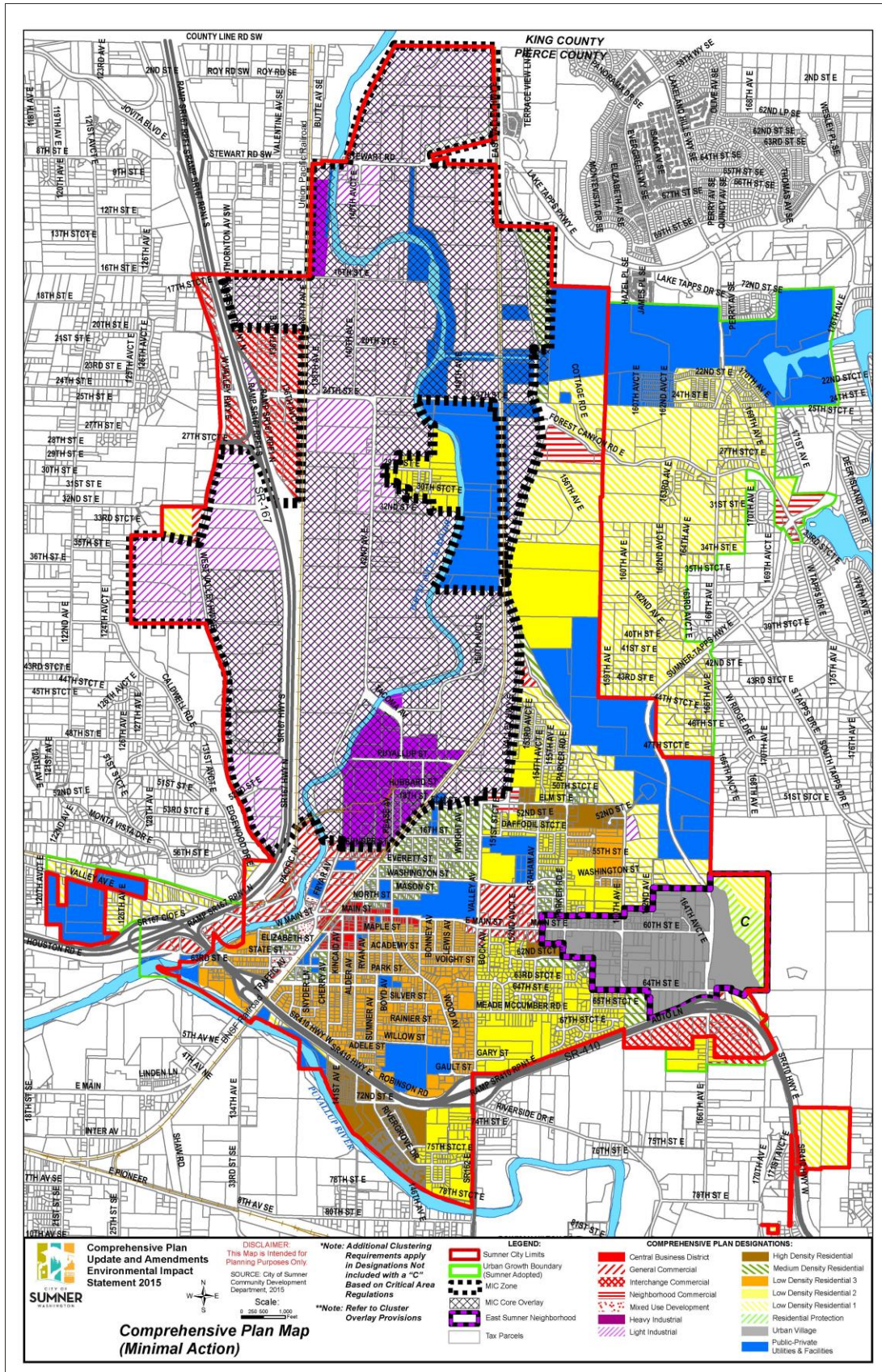
Alternative 2 assumptions show it can meet population, housing and employment targets at 2030 and planning estimates at 2035. See Exhibit 2-7.

Exhibit 2-7. Allocations and Land Capacity – Alternative 2 Minimal Zoning Action

Demographic	Base Year (2010)		Allocations(2010–Horizon Year)				Land Capacity			
	2010 City	2010 UGA	2030 City	2030 UGA	2035 City	2035 UGA	Land Capacity: City	Difference: City Target	Land Capacity: UGA	Difference: UGA Target
Population Gross	9,451	1,112	11,970	2,020	12,570	3,394	13,547	977	3,394	0
Population Net			2,519	908	3,119	2,282				
Housing Units Gross	4,279	509	5,743	925	6,093	1,554	6,155	62	1,554	0
Housing Units Net			1,464	416	1,814	1,045				
Employment Gross	9,316	68	19,599	144	21,762	346	21,909	147	346	0
Employment Net			10,283	76	12,446	278				

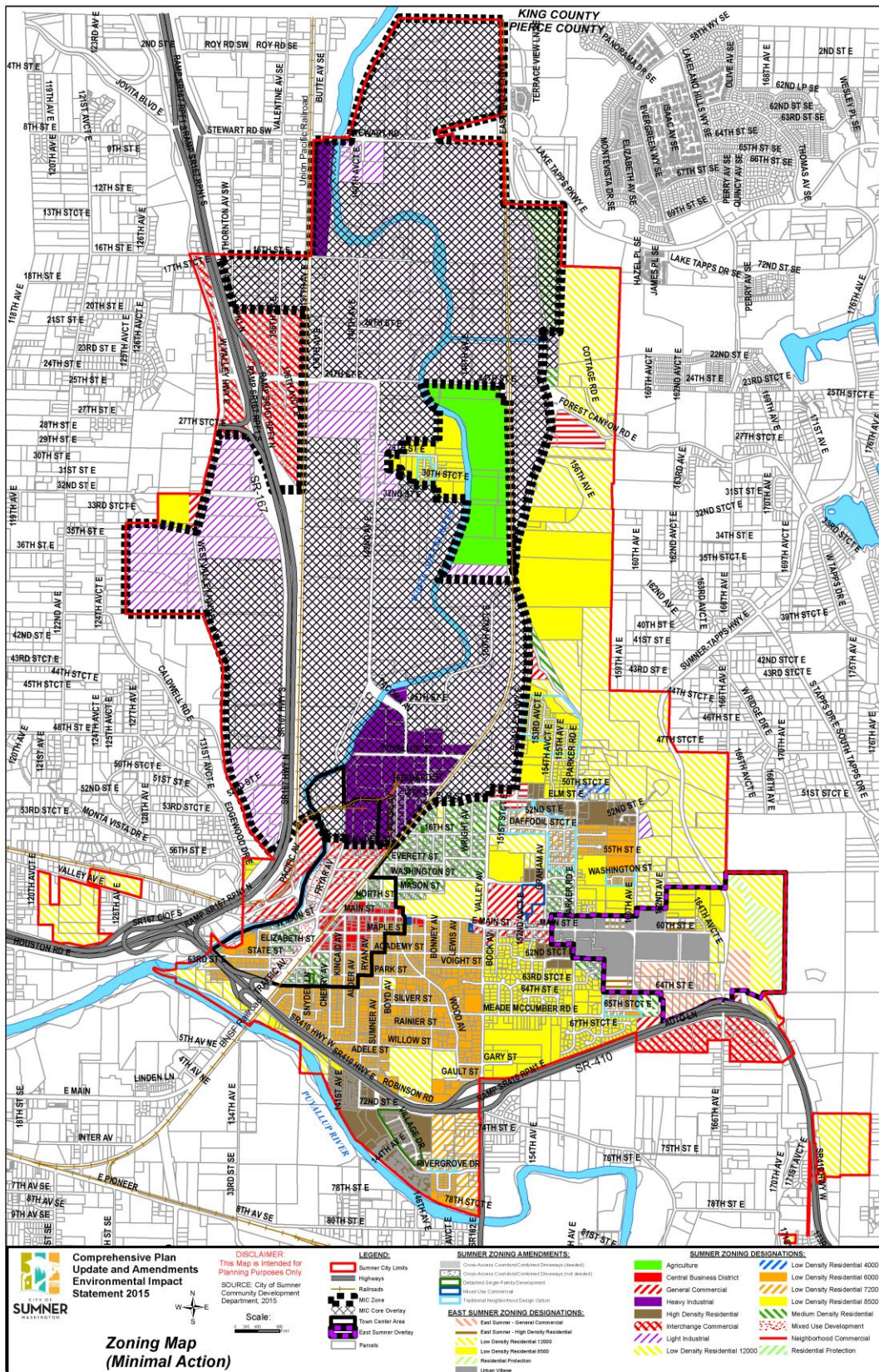
Source: BERK Consulting 2014

Exhibit 2-8. Alternative 2 Minimal Rezone Action: Proposed Comprehensive Plan



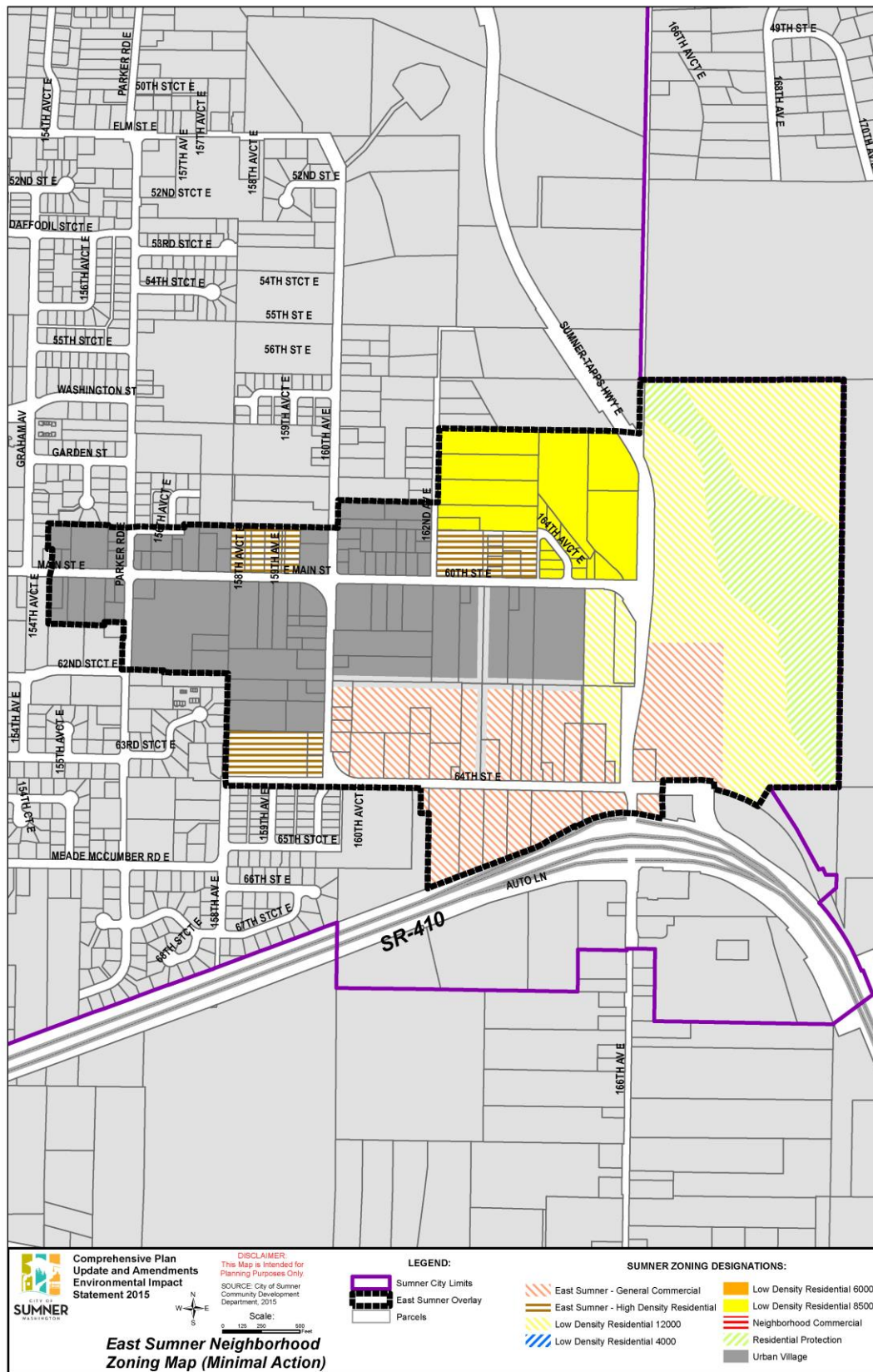
Source: City of Sumner 2015

Exhibit 2-9. Alternative 2 Minimal Rezone Action: Proposed Zoning



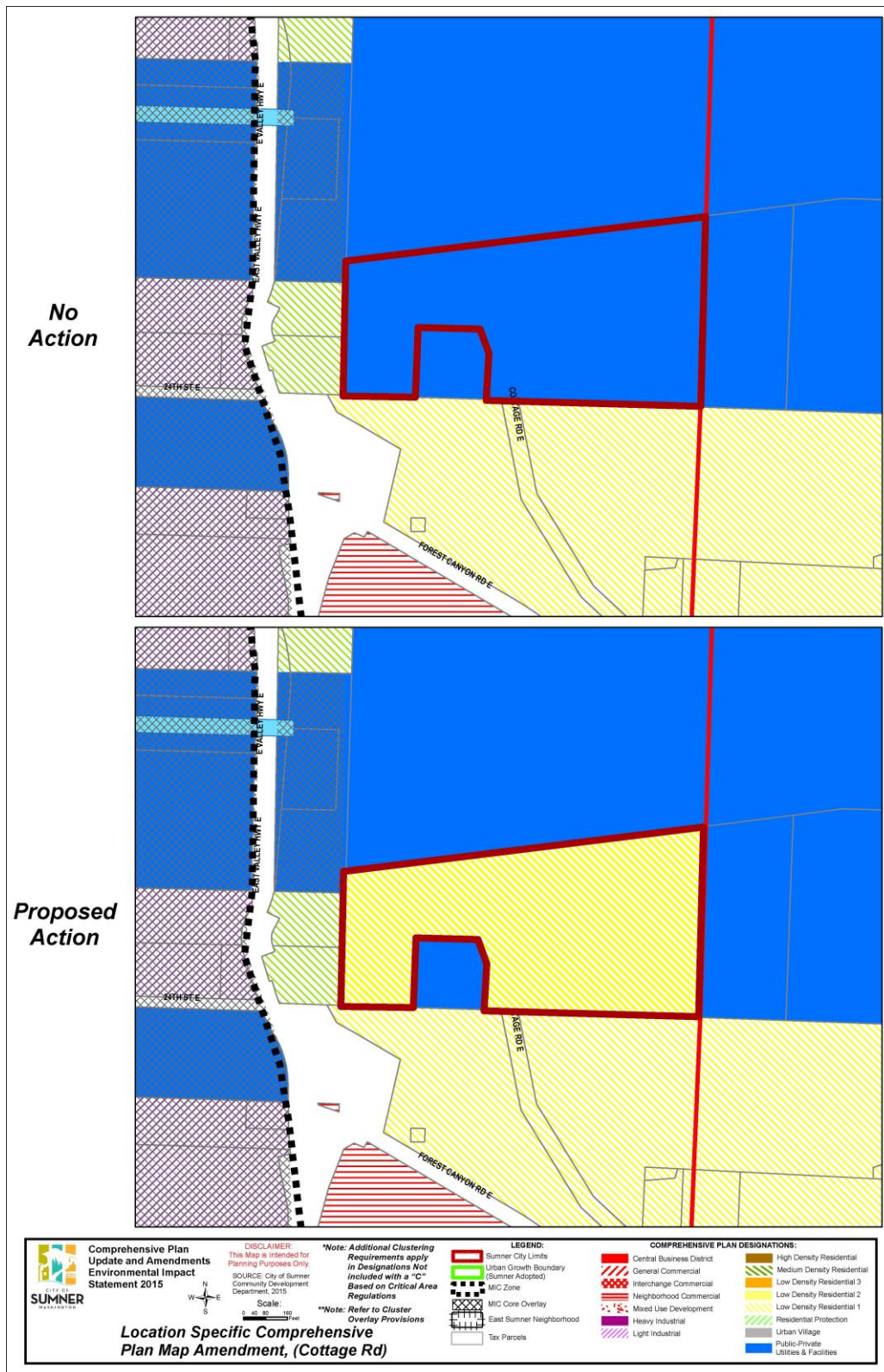
Source: City of Sumner 2015

Exhibit 2-10. East Sumner Proposed Zoning



Source: City of Sumner 2015

Exhibit 2-11. Cascade Water Alliance Surplus Property



Source: City of Sumner 2015

Alternative 3. Assertive Collaborative Action

The Assertive Collaborative Action includes all of the elements of Alternatives 1 and 2 with the exception of (See Exhibit 2-13, Exhibit 2-14, Exhibit 2-15, and Exhibit 2-16):

- East Valley Highway – Industrial Use: The MDR designation on East Valley Highway would be redesignated and rezoned to Light Industrial, M-1.
- Town Center Multifamily Use and Parking: Increase buildable land units in Town Center by 50% (net increase of 115 units above No Action) due elimination of the condominium requirement for multi-family around the train station and changes to parking standards in the Town Center to promote development.
- East Sumner –Assertive Collaborative Action: The Assertive Collaborative Action leverages public improvements to promote new investments in commercial and residential development. This concept is summarized further below.

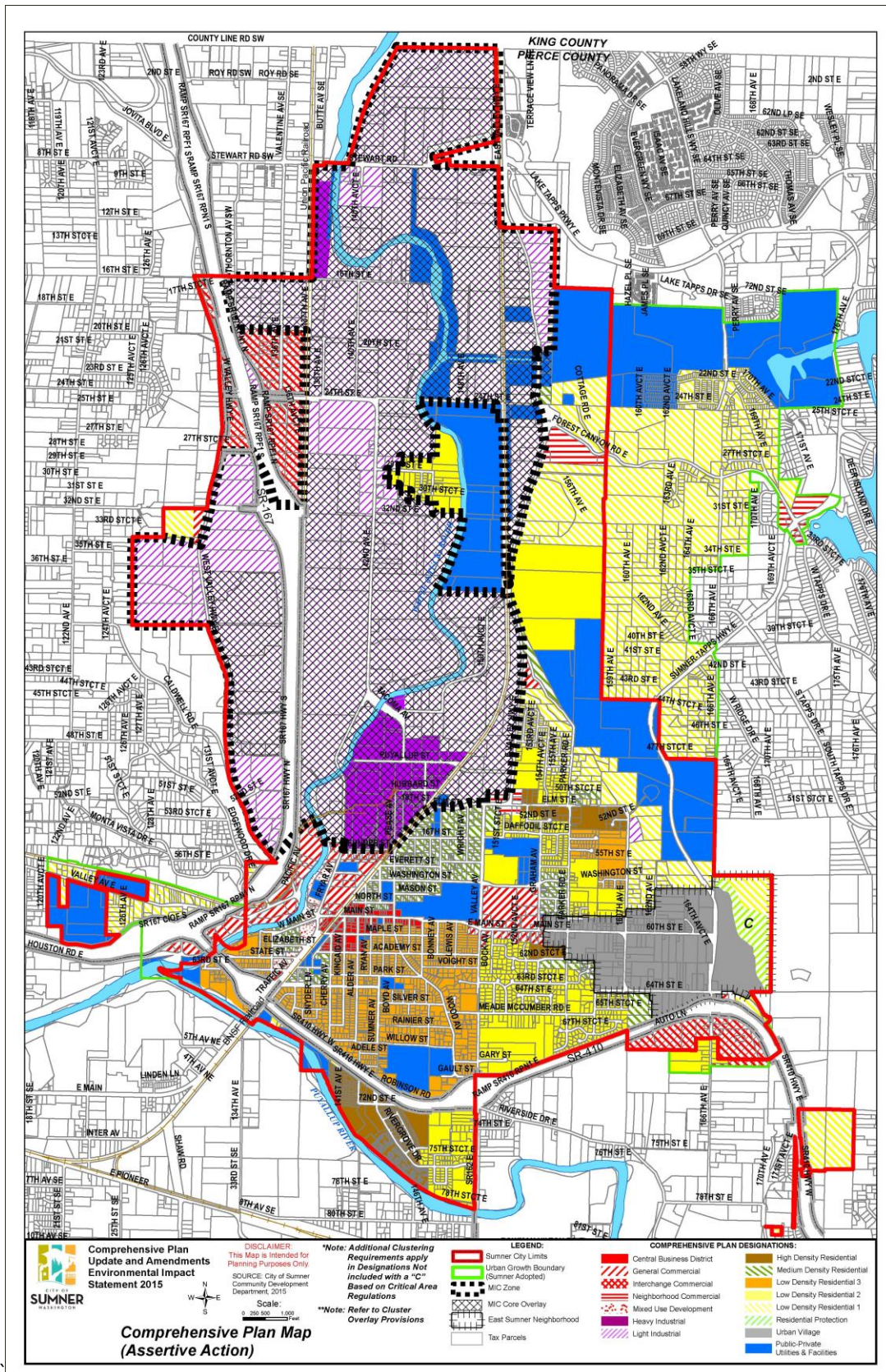
Alternative 3 has capacity to meet all growth targets at 2030 and planning estimates at 2035. See Exhibit 2-12.

Exhibit 2-12. Allocations and Land Capacity – Alternative 3 Assertive Collaborative Action

Demographic	Base Year (2010)		Allocations (2010–Horizon Year)				Land Capacity			
	2010 City	2010 UGA	2030 City	2030 UGA	2035: Proposed	2035 UGA	Land Capacity	Difference	Land Capacity: UGA	Difference: UGA Target
Population Gross	9,451	1,112	11,970	2,020	12,570	3,394	13,610	1,040	3,394	0
Population Net			2,519	908	3,119	2,282				
Housing Units Gross	4,279	509	5,743	925	6,093	1,554	6,183	90	1,554	0
Housing Units Net			1,464	416	1,814	1,045				
Employment Gross	9,316	68	19,599	144	21,762	346	22,262	500	346	0
Employment Net			10,283	76	12,446	278				

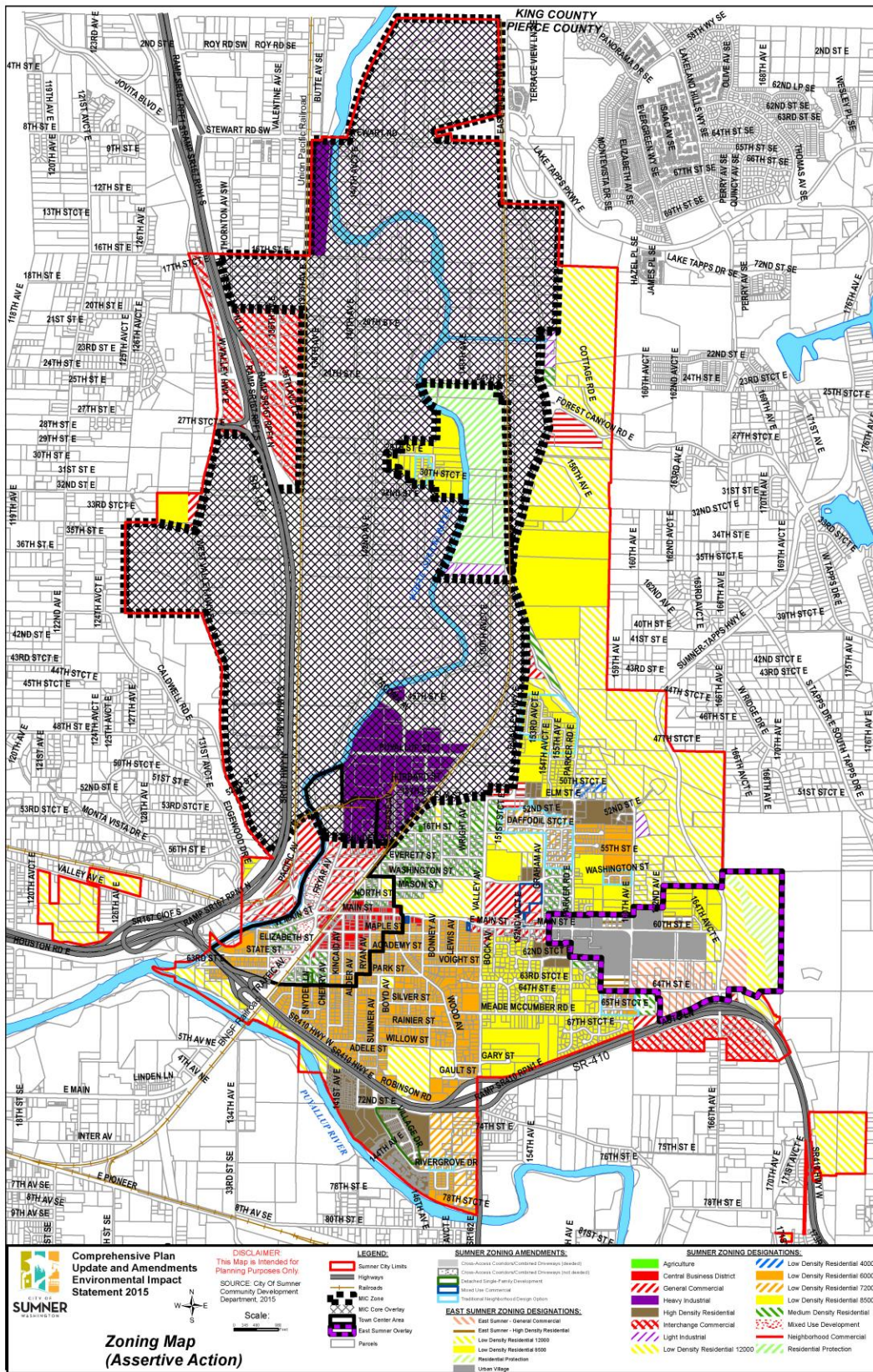
Source: BERK Consulting 2014

Exhibit 2-13. Alternative 3 Assertive Collaborative Action: Proposed Comprehensive Plan



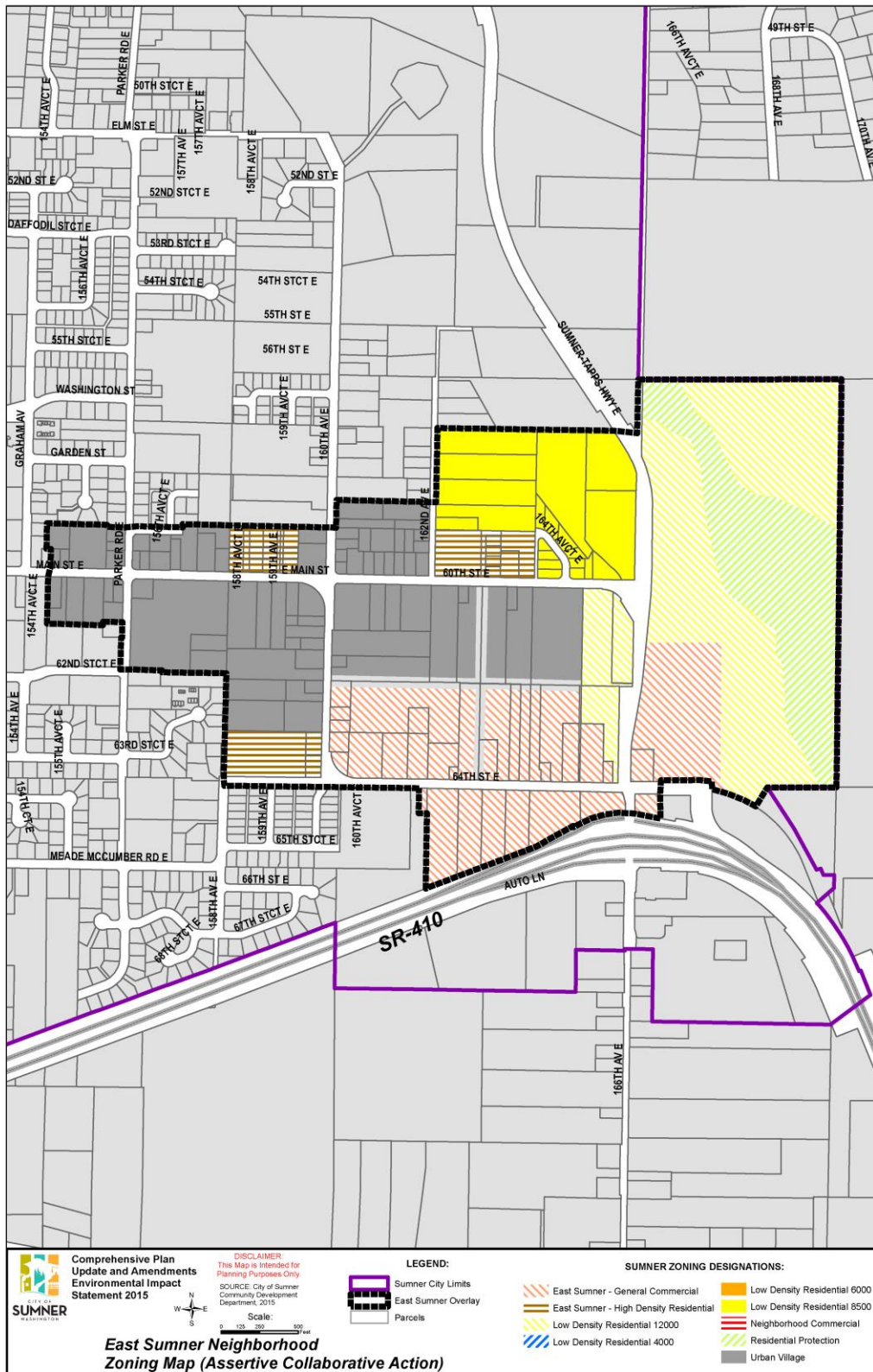
Source: City of Sumner 2015

Exhibit 2-14. Alternative 3 Assertive Collaborative Action: Proposed Existing Zoning



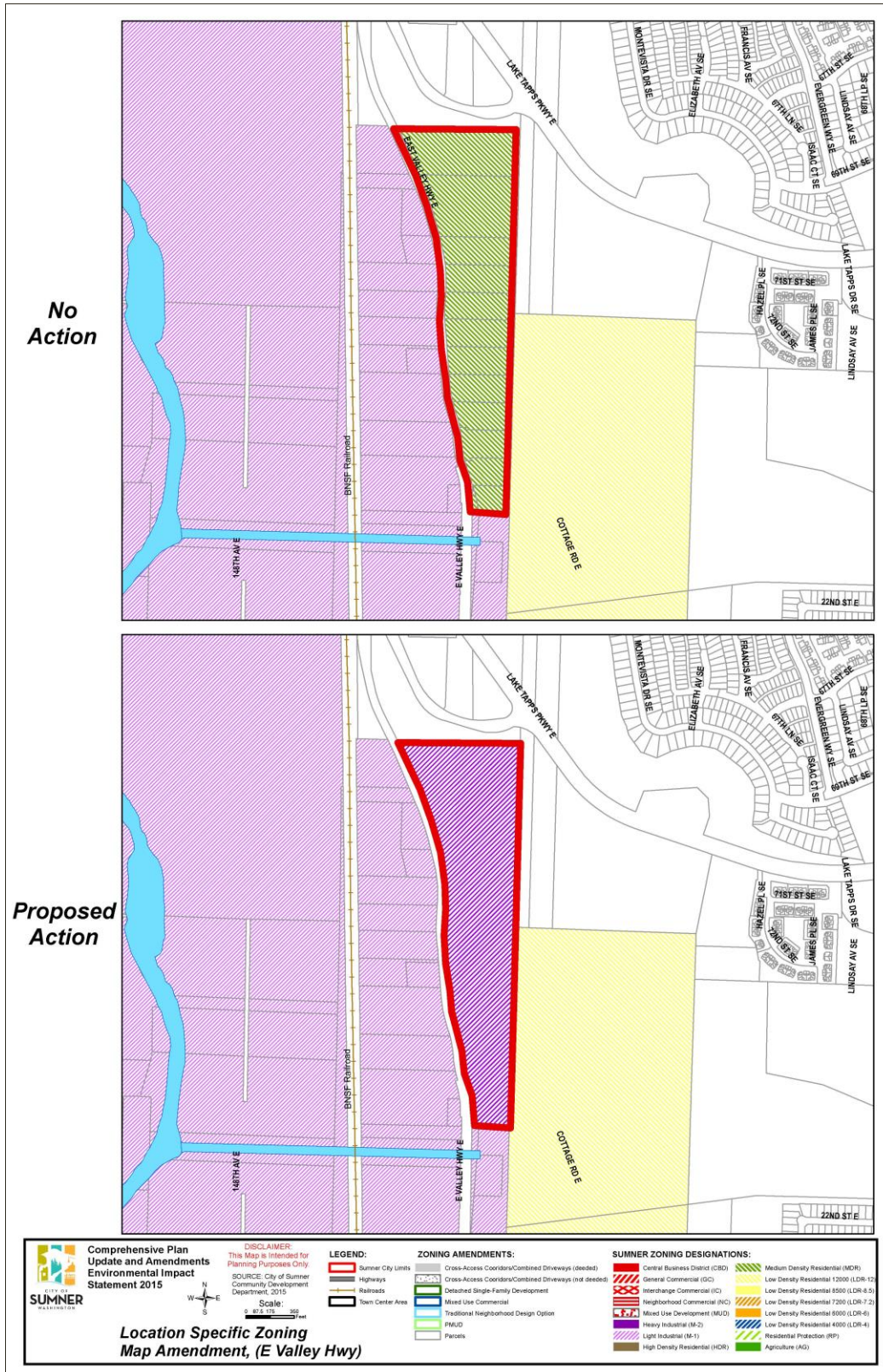
Source: City of Sumner 2015

Exhibit 2-15. East Sumner Proposed Zoning Map



Source: City of Sumner 2015

Exhibit 2-16. Medium Density Residential to Light Manufacturing Map Amendment



Source: City of Sumner 2015

Citywide Policy Changes

The City has conducted an audit of this Comprehensive Plan. In addition to minor housekeeping edits to remove outdated policies and integrate more recent initiatives, the City is considering the following citywide policy changes for both Alternatives 2 and 3 many of which originated from public outreach early in the process:

Land Use Element

- Governance Sub-Element: Include policies related to Spanish speaking population and need for Sumner to lead the way with bi-lingual publications and other similar measures.
- Commuter Rail/Regional Transit Sub-Element: Consider policy changes that would reflect a greater commitment to parking solutions and fixing the SR410/Traffic Avenue interchange.
- Agricultural Land and TDRs: The City will review policies and practices related to long-term agricultural lands within the City limits.
- Historic and Cultural Preservation Sub-Element: The City will consider additional policy language related to maintaining the Sumner Historic District.
- Parking in Town Center: Consider policy to review parking requirements in the downtown to see if parking ratio is too high.

Economic Development Sub-Element

- Events: Consider expanding language regarding parades and events increase specificity
- Branding: Add a policy related to “branding” the City and business promotion.
- Restaurants: Provide increased incentives for promoting or recruiting restaurants to Sumner especially in the downtown.
- Tourism: Consider policy on tourism for expanding economic development.
- Manufacturing: Include a policy that supports increased manufacturing jobs in Sumner and promotes actively recruiting these types of businesses.
- MAKERS and Small Manufacturing: Review current policies in light of the “makers” movement and other smaller manufacturing and Research and Development businesses.

Community Character Element

- Clean-up Day: Consider a policy regarding a clean-up day in Sumner sponsored or organized by the City and other organizations.
- Art Downtown: Consider a policy that makes the Arts Commission more involved in the downtown and artistic elements in City projects, performing arts, public projects, and promoting the arts beyond the concerts.

Parks and Open Space Element

Consider policy amendments in support of the following:

- Small gathering places downtown
- Dog park
- Nature center
- Obstacle Course
- Spray park of other water features

- Connecting community to rivers
- Clarify policy on 35% open space requirement
- Consideration of a significant tree ordinance or policy
- Policy regarding updating the functional plan in 2015-2016

Environment Element

- Flooding: Strengthen policy related to preventing flood damage and acknowledging the City's participation in the Pierce County Flood Control District.
- Zero Rise: Consider "zero rise" as a policy to prevent future flooding.
- Raptors: Consider policy, in coordination with the Washington Department of Fish and Wildlife (WDFW) regarding raptors and their habitat.
- Climate Change: Consider policy regarding climate change and sustainability.
- Open Space and Corridors: Consider amending the map and policies to address any changes to the *Parks and Open Space Plan* as a result of the sale of the City's golf course and any purchases of new lands for parks. The Parks and Open Space maps will be amended to show open space corridors.
- Critical Areas: Undergo a thorough "best available science" review of the Critical Areas Regulations including consideration of recent flood modeling and data such as the Preliminary FEMA flood maps and biodiversity.
- Storm water Policies: Consider adding policies specifically referencing the Ecology Stormwater Manual and low impact development.

Housing Element

- Inventory and Analysis: Review the 2014 Pierce County Buildable Lands Report and apply those findings when updating land capacity analysis done in 2010.
- Adequate Housing and Affordable Housing: Use 2010 US Census data and other market data to determine affordability levels in the City and variety of housing opportunities and consider any amendments necessary to address inconsistencies with GMA.
- Manufacturing Housing Policies: Allow for manufactured housing per state law in Comprehensive Plan Policies to match the City's zoning allowances.
- Senior Housing: Add a policy related to increased incentives for Senior Housing
- Condominiums: Eliminate the condominium requirement for multi-family around the train station to promote development.

Transportation Element

- Traffic Modeling, Forecasts: Update traffic modeling and transportation plan to 2035.
- Transportation Plan: Update the Transportation Plan with new modeling, new forecasts, and provide projects and updated policy.
- Transit: Add a policy related to transit. Continue to monitor demand and coordinate with Pierce Transit and Sound Transit as necessary to promote ridership in Sumner.
- Healthy Living: Promote healthy living through community design and accessibility to walking and multi-modal travel options.

- Connection to Hills: Add a policy that makes connecting to the hills a priority for walking and bicycle paths.
- Trail Plan Update: Provide a policy directing a need to update the trail plan in 2016.
- Electric Vehicle Charging: Consider policy and code amendments allowing for electric vehicle charging stations per GMA.
- Transportation Concurrency: Consider adding requirements to the Sumner Municipal Code requiring concurrency per GMA.

Capital Facilities Element

- Capital Budget Decisions: Add policies related to “capital budget decisions.”
- Capital Facilities Plan (CFP): Update the City CFP.
- Relation to Land Use Element: Consider clarifying policies to meet specific language in GMA related to reassessing the policies and procedures in the Land Use Element if probable funding falls short.
- Impact Fees: Review and add any additional policies related to impact fees as necessary.
- Impact Fee Timeline: Consider extending the timeframe for expending or encumbering impact fees.

Utilities Element

- Capacities, Locations, etc.: Contact and coordinate with utility providers to see what future plans there are and how they reflect any changes from the 2010 Comprehensive Plan Update.

Family and Human Services Element

Proposed Amendments:

- Policy that would promote a grocery store in the downtown.
- Policy that would prevent the exclusion of medical clinics or promote other options for affordable medical care.
- Policy referencing programs such as “Big Sister/Big Brother” and directing them to other agencies or organizations.
- Policy regarding more family friendly events to promote family friendly businesses and activities.
- Healthy living policies as may be proposed by the health department.

Consistency with the Growth Management Act

- Consistency with Regional Policies: Review for consistency Comprehensive Plan policies with the County-wide Planning Policies (CPPs) and Multi-County Planning Policies (MPPs) in VISION 2040. The City will consider policy language that specifically addresses the need for consistency between the City’s Comprehensive Plan and CPPs and VISION 2040.
- Coordinate Plans: Evaluate and coordinate with adjacent jurisdictions (Auburn, Pacific, Edgewood, Pierce County, Puyallup and Bonney Lake) during the update process.

Shoreline Provisions

- Consistency: Integrate the Shoreline Master Program (SMP) that was approved by Ecology in 2014. Consider amendments to the goals and policies in the Comprehensive Plan to ensure consistency between the SMP and Comprehensive Plan.

Taking of Private Property

- Takings: Consider adding a policy in the Governance Sub-element regarding taking of private property and constitutional rights.

Citywide Zoning and Code Changes

The proposed zoning and development code updates are consistent between Alternatives 2 and 3. The City would update the development regulations to ensure that critical area regulations are based on the best available science, to require concurrency consistent with state law, to facilitate development in the downtown core, address the siting of essential public facilities.

Amendments to the zoning map and development regulations would also be considered, including but not limited to:

- Prepare an amendment to the Zoning Code (Title 18) to address the siting of essential public facilities (EPFs) per RCW 36.70A.200.
- Prepare an amendment to development regulations to require concurrency per RCW 36.70A.070(6)(b).
- Prepare an amendment to the timeframe for extending or encumbering impact fees per RCW 82.02.
- Prepare amendments to Critical Areas Regulations if needed following a BAS review.
- Consider amendments to Town Center parking requirements and elimination of condominium requirement to promote vision for Town Center.
- Redesignate property along the East Valley Hwy from MDR to M-1 at the request of the property owner (Petersen Bro.) (Alternative 3 only).
- Redesignate property at 1418 Wood Avenue from Neighborhood Commercial (NC) to Light Manufacturing (M-1).
- Amend the Manufacturing/Industrial Center boundary to include the former Sumner Meadows Golf Course.
- Remove Design Districts designations.
- Remove PMUD overlay from Fleischmann's property and include it in the Manufacturing/Industrial Center (MIC).
- Replace Agriculture zoning designation with Residential Protection zone.
- Prepare SEPA Planned Action or Infill exemption ordinance for East Sumner.
- Other miscellaneous clean-up and housecleaning modifications to zoning, and development regulations.

Trend Assumptions

All alternatives assume implementation of a robust industrial and commercial component. To capture trends, the SEIS studies different job mixes (see Exhibit 2-17):

- Alternative 1 assumes a job mix consistent with sector breakdowns in the Manufacturing Industrial Center (MIC) Study (2009). That assumes much higher Construction/Resource jobs at over 38%.
- Alternatives 2 and 3 assume a job mix based on the Puget Sound Regional Council's Land Use Targets Workbook. The Land Use Targets Workbook considers local growth allocations and extends targets from 2030 to 2035 in Pierce County. The Land Use Targets workbook includes projected jobs by sectors, and forecasts a Construction/Resource share in Sumner at about 14%. PSRC job sector

shares are proposed for application in all employment areas except for Sumner Meadows which has a proposed job mix weighted towards warehousing and manufacturing. This shows a trend towards commercial and service jobs, less construction/resource jobs, and still one third of jobs in warehousing and manufacturing.

Exhibit 2-17. Alternative Job Mix Assumptions

Alternative	Construction/ Resource	Retail	Finance Insurance Real Estate Services	Government / Education	Warehousing, Transportation, Construction, Utilities	Manufacturing
Alternative 1 No Action	38.15%	9.35%	2.2 %	0.15%	33.95%	16.20%
Alternatives 2 and 3, except at Sumner Meadows	14.09%	15.70%	32.57%	3.77%	23.71%	10.16%
Sumner Meadows					14%	86%
Effective Citywide Job Mix	11.3%	12.6%	26.1%	3.0%	21.8%	25.3%

Source: BERK Consulting 2014

East Sumner Neighborhood Plan Alternatives

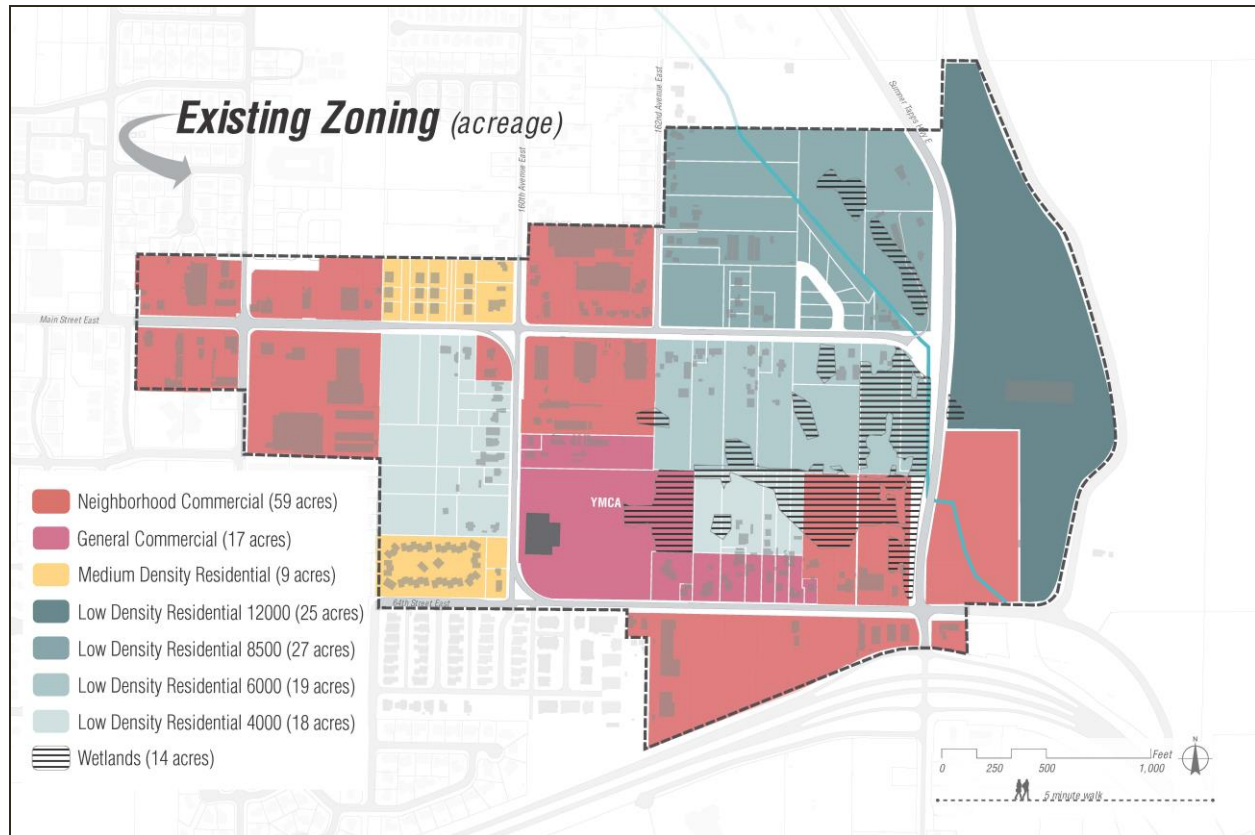
Alternative ES-1. No Action Alternative

The No Action Alternative maintains the existing zoning (see Exhibit 2-18) and land use in the East Sumner Neighborhood. The existing zoning includes areas designated for Neighborhood Commercial (NC), General Commercial (GC), MDR, and a range of Low-Density Residential (LDR) districts. Alternative 1 does not include any investments in public infrastructure that are included in either of the action alternatives.

East Sumner would grow according to current planning and zoning allowances and without additional infrastructure or SEPA process incentives. Planned growth would include the following net increases:

- 2010-2035 Dwelling Units: 246
- 2010-2035 Jobs: 418

Exhibit 2-18. East Sumner Existing Zoning, No New Infrastructure Changes



Source: MAKERS October 2014

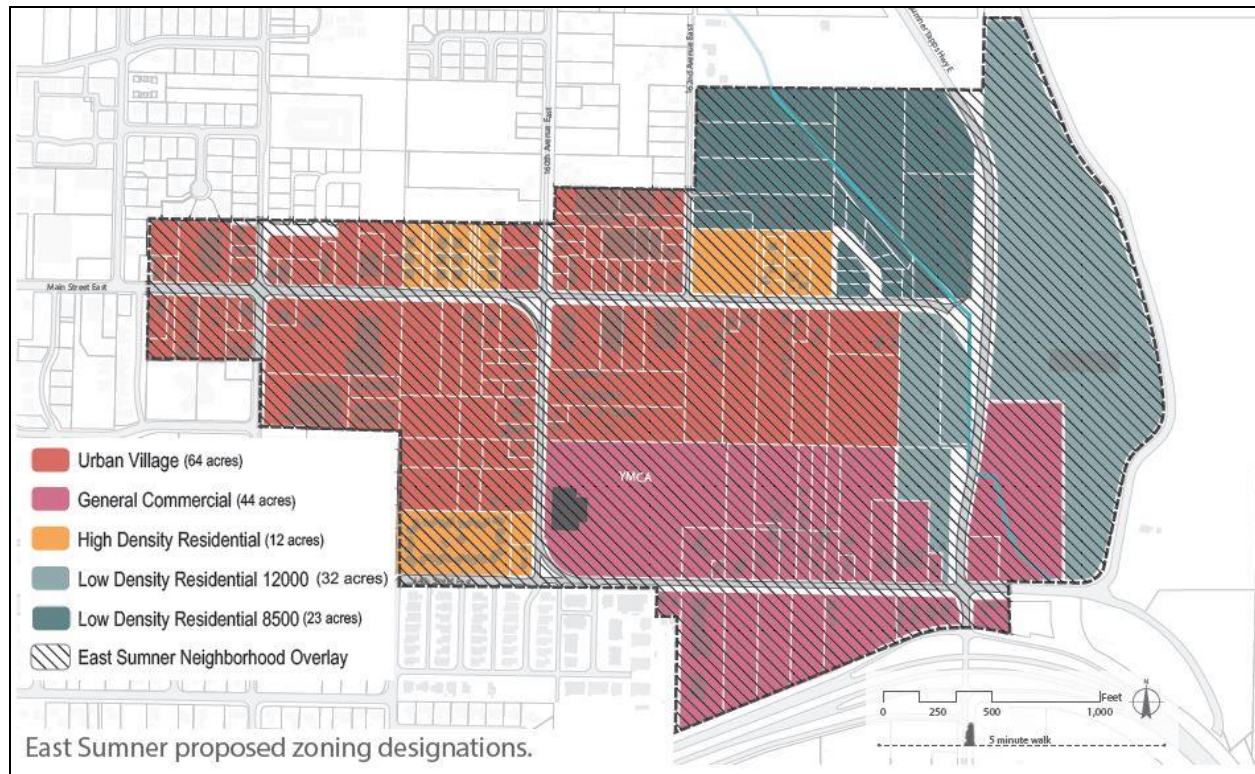
Alternative ES-2. Minimal Action Zoning Action

This alternative is focused on rezoning properties in the East Sumner neighborhood to allow multi-family and mixed-use development along with planned improvements to Main Street (see Exhibit 2-19). A new Urban Village Designation would be applied along East Main Street. GC zoning would be applied along 64th Street. Low Density Residential (LDR) is retained along Salmon Creek and north of East Main Street. Alternative 2 does not include substantial public investment in infrastructure including an off-site wetland mitigation bank, new street improvements, open space or trail investments.

East Sumner would grow according to revised planning and zoning allowances, minimal infrastructure improvements, but with SEPA process incentives. While there would be some upzoning of land, due to the presence of wetlands limiting the type and pattern of growth, planned growth would be moderate, and higher than No Action particularly for housing, but less than Alternative 3:

- 2010-2035 Dwelling Units: 355
- 2010-2035 Jobs: 418

Exhibit 2-19. Zoning – Minimal Zoning Action



Source: MAKERS 2015

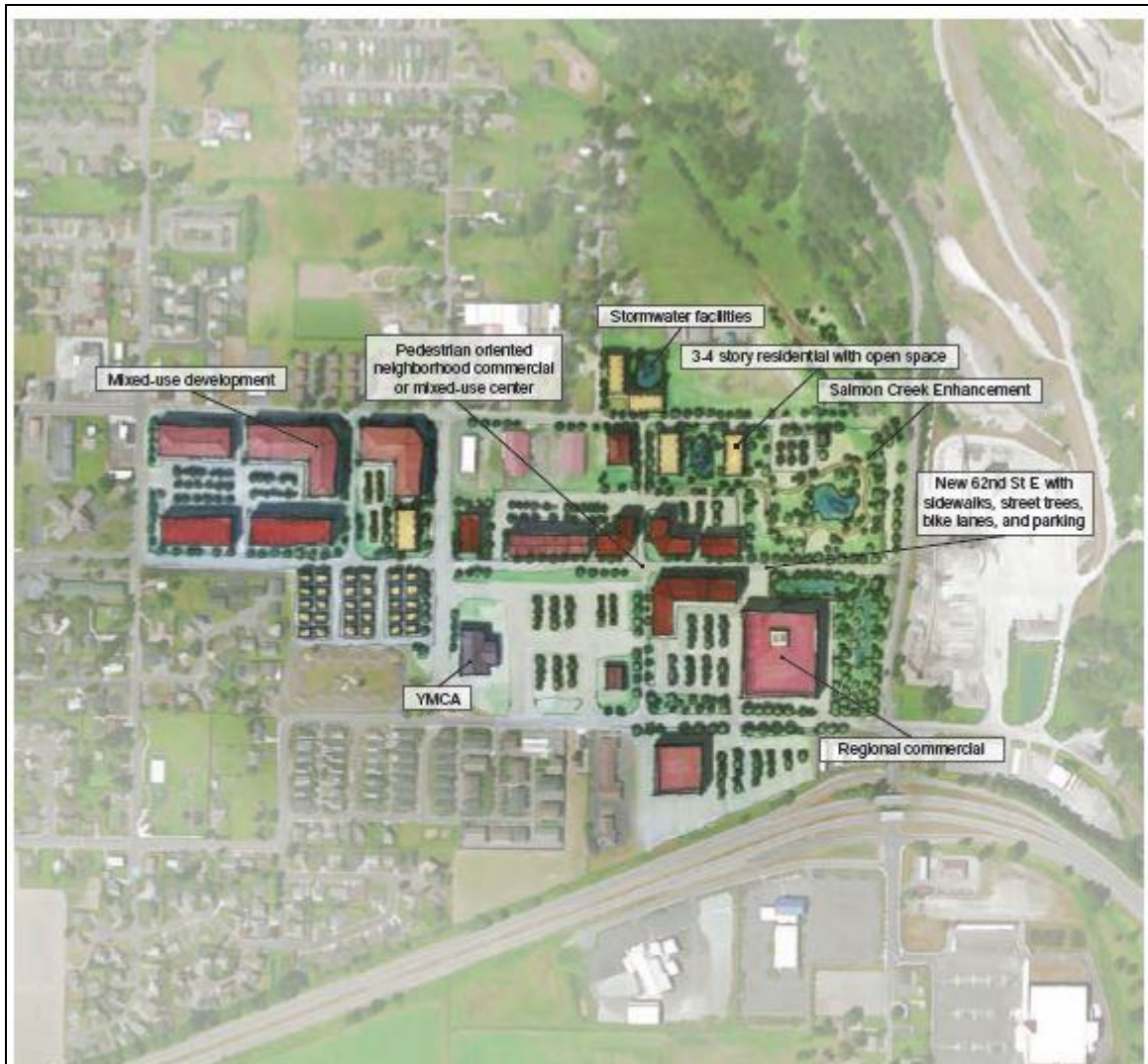
Alternative ES-3. Assertive Collaborative Action

The Assertive Collaborative Action involves street improvements, design and construction of a new street, wetland mitigation, rezoning and the establishment of a park along Salmon Creek (see Exhibit 2-20 and Exhibit 2-21). This alternative maximizes future development potential for multi-family and mixed-use development in the neighborhood. The alternative specifically includes the following actions:

- Build 62nd St. E from 160th Ave E to Sumner Tapps Hwy with a major intersection there.
- Build a new local street from 64th Street E to 60th Street East. Establish an off-site mitigation bank either on City-owned property along Salmon Creek and/or at City AG zoned property.
- Property owners will address stormwater issues on-site or collectively.
- Rezone to encourage more intense commercial or mixed-use development south of the new 62nd St E and east of the YMCA.
- Improve Main Street, especially for pedestrians and cyclists.
- Establish a park along Salmon Creek

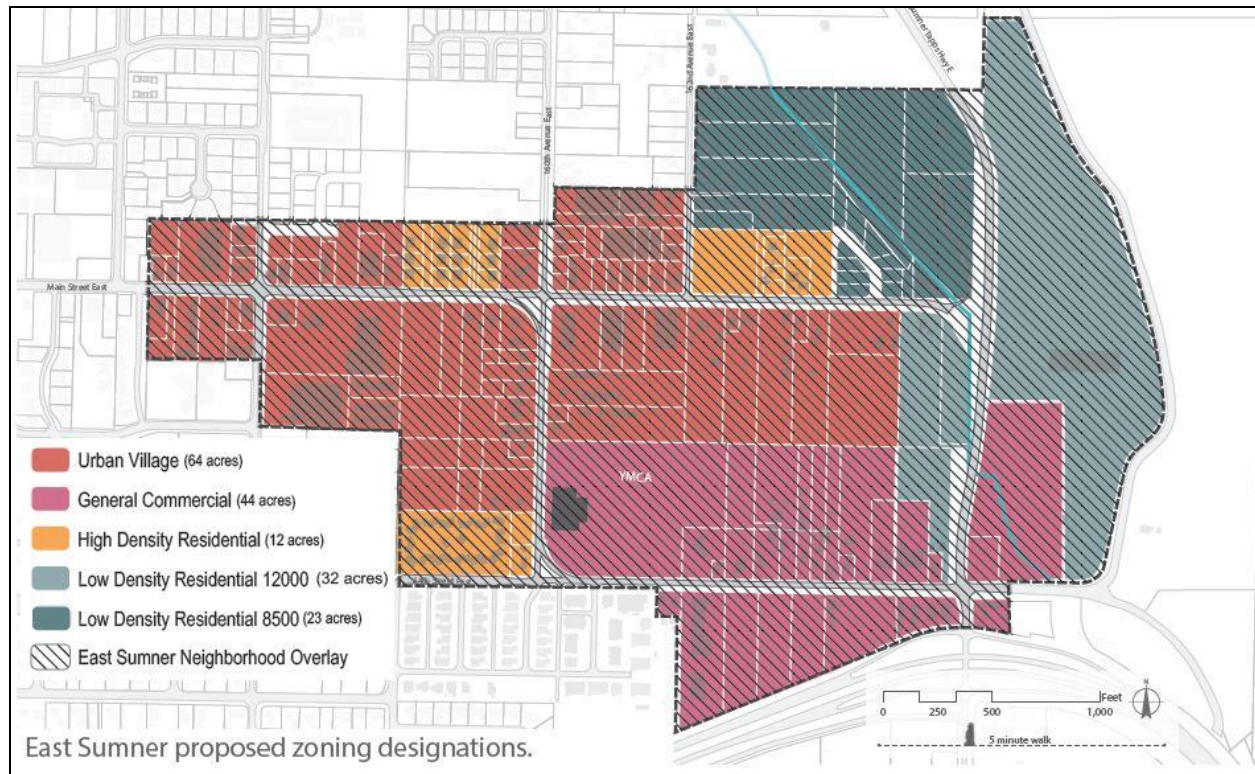
In order to allow for urban development, wetland mitigation would have to occur in a collective offsite location. Likely this would occur on public property. If there is insufficient room on the City-owned property on the central block along Salmon Creek, another option would be the City-owned AG zoned property west of the BNSF Railroad Tracks and south of 24th Street.

Exhibit 2-20. Assertive Collaborative Action Concept



Source: MAKERS 2015

Exhibit 2-21. Assertive Collaborative Action – Zoning



Source: MAKERS 2015

East Sumner would have a greater potential for growth due to amended planning and zoning allowances and more extensive infrastructure and offsite wetland mitigation efforts, as well as the SEPA process incentives. Planned growth would include the following net increases:

- 2010-2035 Dwelling Units: 500
- 2010-2035 Jobs: 581

Comparison of Alternatives

All three alternatives are based on consistency boundaries for the UGA and would result in the following comparisons (see Exhibit 2-22):

- The No Action Alternative does not meet the 2035 housing target and results in a deficit of housing units by approximately 105 units.
- The zoning changes proposed for the East Sumner Neighborhood are the same between the two action alternatives. The Assertive Collaborative Action Alternative includes investments in infrastructure that will result in a greater likelihood of plan implementation and build out.
- Difference along East Valley Highway with Alternative 2 retaining MDR as a factor in having variety of housing types and Alternative 3 reinforcing employment character with change to M-1.
- The population, housing and employment capacities between the two action alternatives are generally consistent.

Exhibit 2-22. Alternatives Comparison

Feature	No Action	Minimal Zoning	Assertive Collaborative
Land Area (Acres)	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931
Population Capacity (Persons) in City Limits	13,184	13,547	13,610
Housing Capacity (Dwelling Units) in City Limits	5,988	6,155	6,183
Employment Capacity (Jobs) in City Limits	21,909	21,909	22,262
Comprehensive Plan Amendments	None	Land Use Map amendments regarding PPUF Surplused Property to LDR and Wood Avenue NC to M-1. Update Comp Plan Elements to address 2010-35 growth, housekeeping items, and for consistency. Updated East Sumner Neighborhood Plan.	Same as Alternative 2 plus MDR changed to Light Industrial along East Valley Highway Same as Alternative 2. Same as Alternative 2.
Zoning Map Changes	None	Remove Design Districts Add MIC to Sumner Meadows and Fleishmann's. Amend Wood Avenue NC to M-1. Change AG zone to Residential Protection. Upzone East Sumner to allow for mixed-use development, multi-family residential, and local and regional retail.	Same as Alternative 2 plus Medium Density Residential changed to M-1 along East Valley Highway.
Development Regulation Amendments	None	Critical Areas Regulations amendments, Town Center Parking, and eliminating Condo Requirements, Implement Sumner Meadows Zoning Changes, Subdivision Regulations, and Concurrency Requirements.	Same as Alternative 2.
Public Improvements	None	Transportation Master Plan proposed Improvements, including improvements to Main Street.	Transportation Master Plan proposed Improvements, including new Street Improvements, Off-site Wetland Mitigation Bank, Open Space, and Trails.

Source: BERK Consulting 2014

2.5 Benefits and Disadvantages of Delaying the Proposal

SEPA requires a discussion of the benefits and disadvantages of reserving, for some future time, the implementation of a proposal compared to possible approval at this time. In other words, the City must consider the possibility of foreclosing future options by implementing the proposal.

Adopting a Comprehensive Plan that includes new household and employment forecasts and updated goals and policies has several benefits:

- Provides for a diversified employment base and a greater range of housing choices.
- Prepares the City for the state-mandated 8-year Comprehensive Plan Update with household and employment forecasts required to 2035.
- Guides development and City resource allocations to meet forecast trends along with the community vision.
- Allows for growth to be directed in proximity to public services and utilities.
- Modifies the UGA boundary consistent with a recent decision from the Growth Management Hearings Board reversing prior amendments to the City's UGA.

Delaying implementation of the proposal could delay natural environment impacts on vacant and underdeveloped lands in the current plan area and East Sumner Neighborhood. This potential growth may instead occur elsewhere in Pierce County, with unknown potential for related impacts at those other locations. Delaying implementation of the proposal would allow for growth to occur on the basis of the current City Comprehensive Plan and zoning regulations, but would not prepare the City for new growth allocations and a new horizon year. In addition, the City would not have sufficient housing capacity to meet the growth target for 2035 under the No Action Alternative, which may result in a lack of housing supply and negatively impact housing affordability.

2.6 Alternatives Previously Considered and Future Alternatives

The City previously considered the following variations of the East Sumner Neighborhood Plan alternatives:

Green Core “Campus” – This alternative integrated a neighborhood campus into the core of the neighborhood consisting of stormwater treatment, wetlands, a multi-use trail, creek restoration and other open space amenities

The Combination – This alternative integrates components of the other two alternatives and includes a large central wetland and public-park, off-site wetland mitigation, trails and areas for multi-family residential and high-intensity commercial.

Ultimately the above two alternatives for the East Sumner Neighborhood vetted and modified in favor of the Assertive Collaborative Action Alternative that maximizes the development potential and revenue while providing for new street improvements, a local commercial district, off-site mitigation, areas for stormwater treatment and a forested wetland.

For the citywide components of the three alternatives the City only considered those alternatives that are consistent with the plan objectives including, but not limited to, accommodating established growth targets, supporting the City of Sumner as a center for jobs, and ensuring an adequate and diverse housing supply. Future alternatives that are consistent with the range of alternatives studied in this EIS will be considered in the future.

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

Prior to preparation of the Final EIS, the City plans to resolve the following:

SUMNER COMPREHENSIVE PLAN UPDATE SEIS ALTERNATIVES

- East Sumner Neighborhood and whether there will be a more assertive investment in infrastructure and intensive land use pattern with offsite habitat improvement.
- Appropriate balance of jobs and housing considering requests for employment along East Valley Highway.
- Whether condominium requirements will be removed in the Town Center. This issue has an effect on growth capacity and the City's ability to meet growth targets for at least one of the alternatives (Alternative 2).
- Refinement of Comprehensive Plan goals, objectives and policies and development regulations.

3.0 AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION

3.1 Earth

This section addresses the topography and soils in the vicinity of the alternatives and the potential impacts of geological hazards on future development.

Affected Environment

Citywide

This section is based on various geotechnical reports and geologic research completed for plans and projects in the City of Sumner. The City is within a broad and flat valley created from glacial events. A widespread mudflow, named the Osceola Mudflow, occurred approximately 5,600 years ago and deposited mud and alluvium from Mt. Rainier over existing glacial drift on the lowland plains. It contains a high amount of clay, silt, and sand, with a smaller proportion of gravel. This material can be up to 75 feet thick in the White River valley.

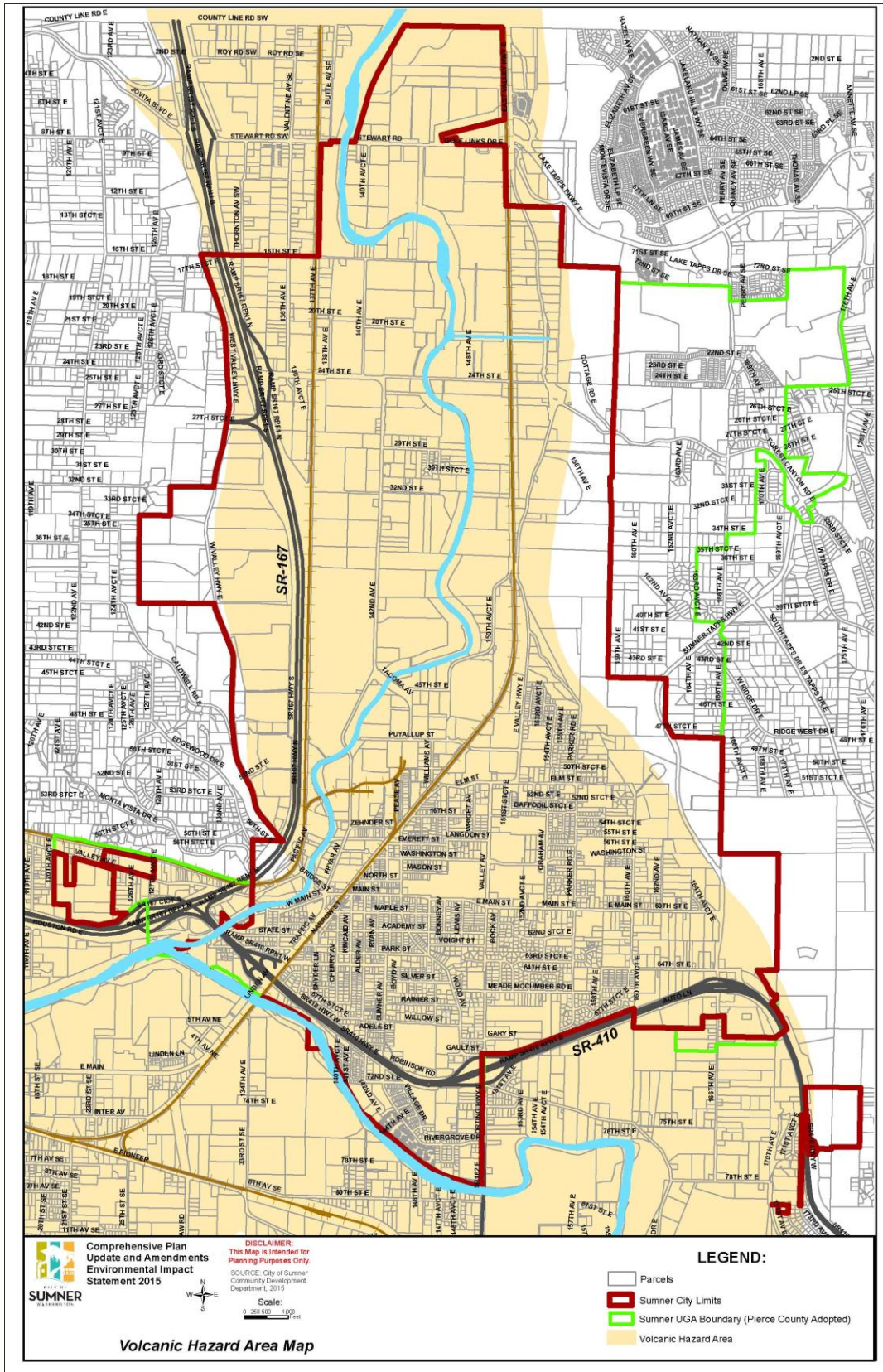
The majority of the City of Sumner is located within a volcanic hazard area (see Exhibit 3-1). The river valleys are in the potential path of debris flows from Mt. Rainier if an eruption occurs. A large portion of the City is also within a high potential dynamic settlement and liquefaction hazard areas and is also therefore in a susceptible seismic hazard area (see Exhibit 3-2). The only landslide hazards in the city limits are along the eastern slopes leading up to Lake Tapps (see Exhibit 3-3). There is a small area along the mid-western City boundary with steep slopes the White River Watershed of WRIA 10 (Puyallup-White). Lands with permits for mineral extraction include the CTI Pit and Corliss Pitt, both of which are located along the eastern hillslope of Sumner city limits. (See Exhibit 3-4)

Groundwater levels are typically shallow, which has implications for site development and building foundation design and for stormwater management. Studies conducted within the East Sumner Neighborhood showed groundwater levels between 2 and 5 feet below ground surface (BGS). Other studies in the vicinity of the Sumner Meadows Golf Course showed similar groundwater levels. A geotechnical study conducted for the 24th Street Bridge project showed groundwater at 10 – 15 feet BGS.

East Sumner

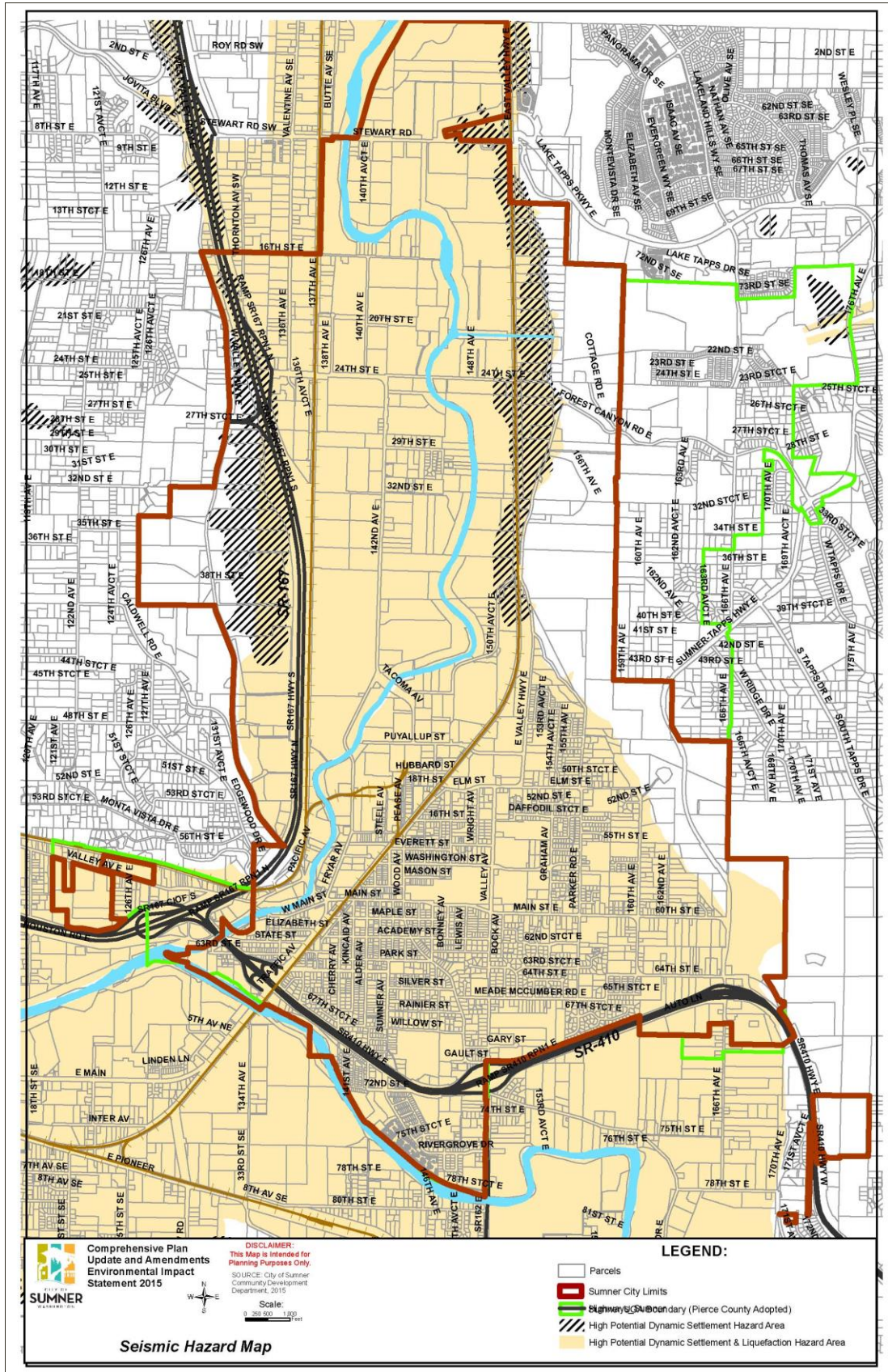
Topography in the East Sumner Neighborhood is flat up to the eastern slopes leading up to the Lake Tapps neighborhood. Steep slopes begin east of Salmon Creek and Sumner-Tapps Hwy E. Soils typically consist of Briscot silt loams, Puyallup fine sandy loam, and Sultan silt loams. The Briscot series consist of very deep poorly drained soils formed in recent alluvium on floodplains with 0 to 2 percent slopes. The Puyallup series is characterized as well drained soils formed in floodplains and terraces and is comprised of alluvium. The Sultan series consists of very deep, moderately well drained soils formed in recent alluvium on floodplains. Groundwater within this vicinity is typically shallow; a geotechnical study conducted near 160th Ave showed groundwater at 2 to 5 feet BGS.

Exhibit 3-1. Volcanic Hazard Area Map



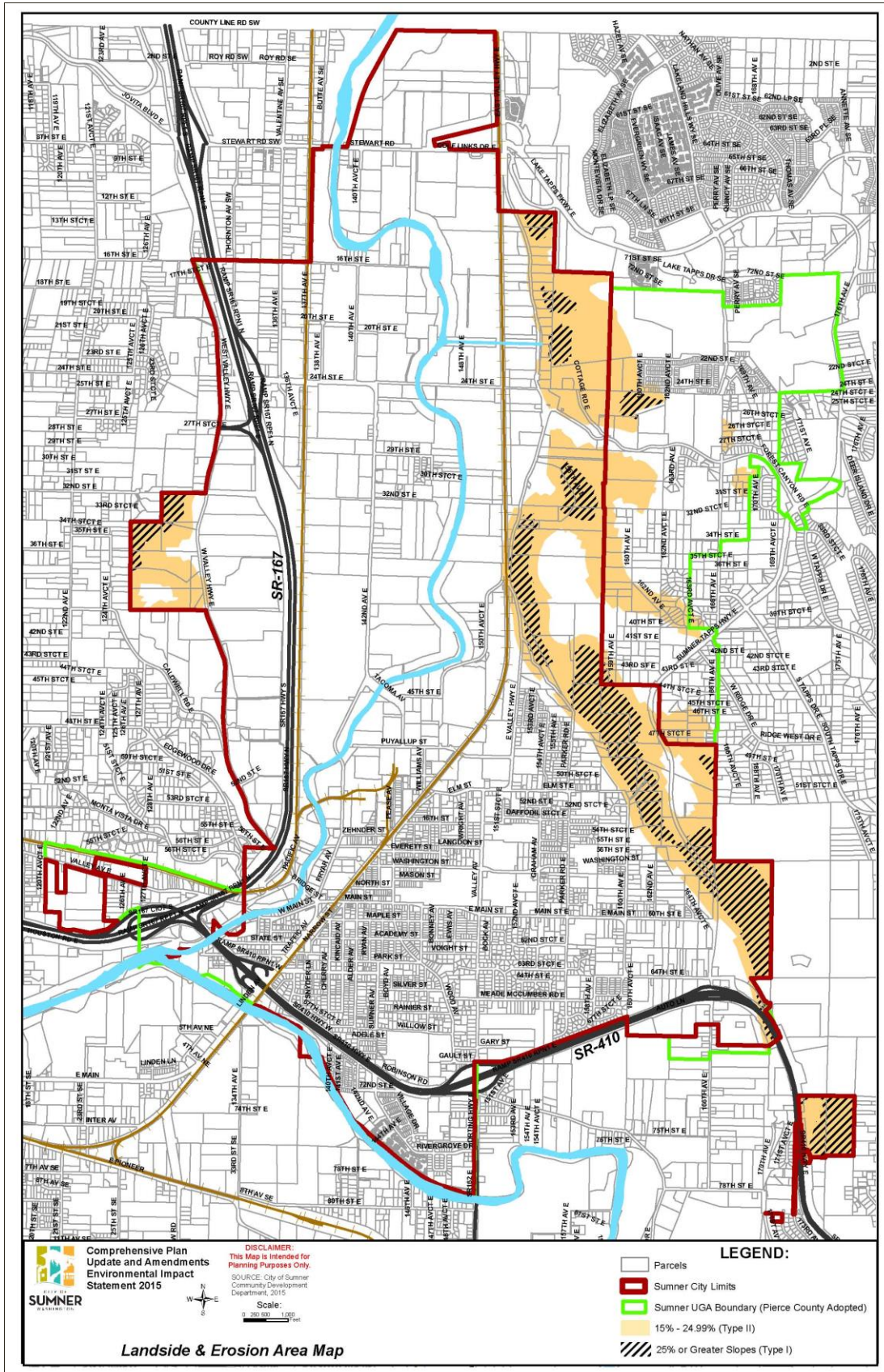
Source: City of Sumner 2015

Exhibit 3-2. Seismic Hazard Map



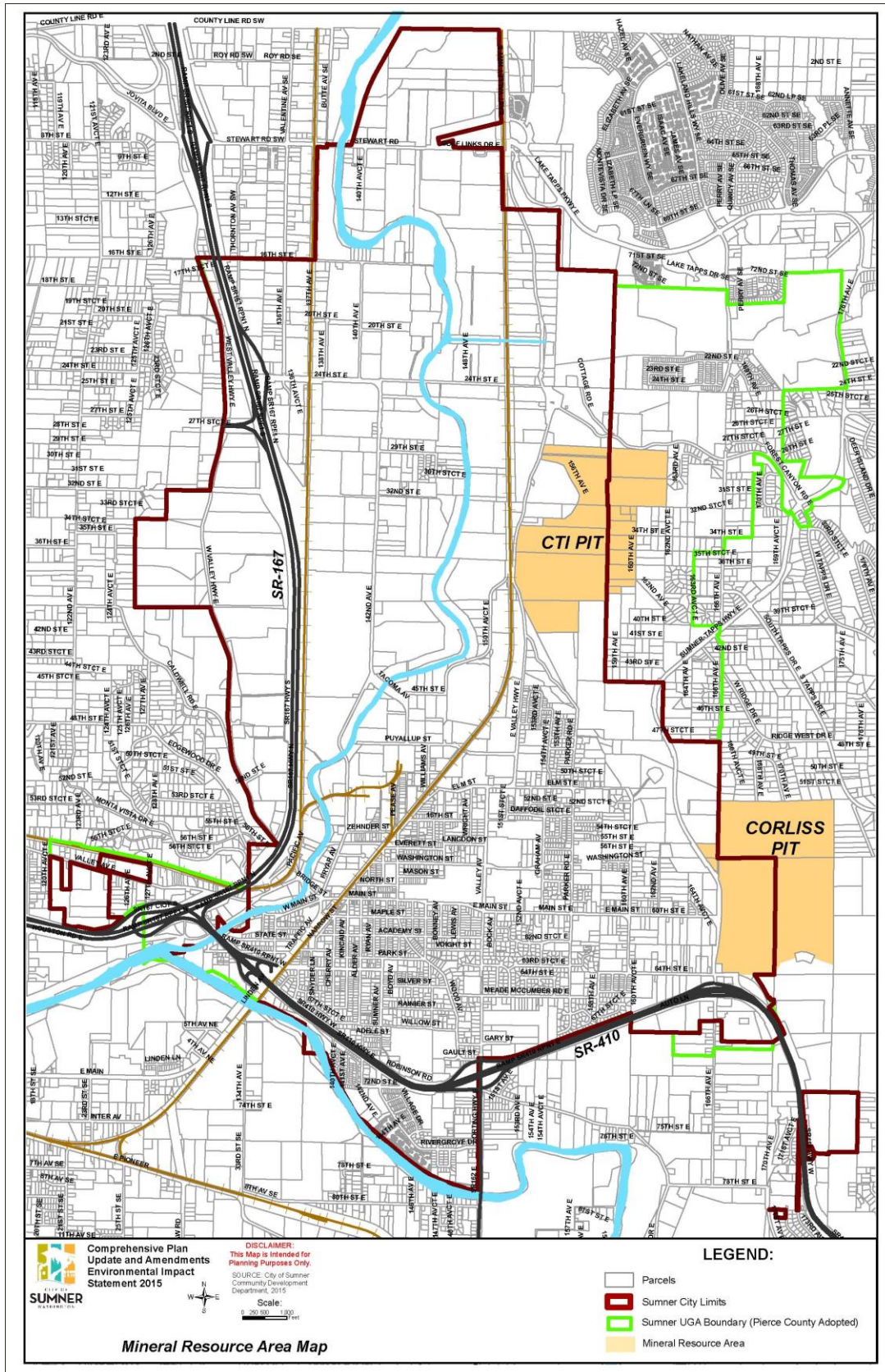
Source: City of Sumner 2015

Exhibit 3-3. Landslide Hazard Area Map



Source: City of Sumner 2015

Exhibit 3-4. Mineral Resource Area Map



Source: City of Sumner 2015

Impacts

Impacts Common to All Alternatives

There is a potential for new development under all alternatives. All new development would be in seismic and volcanic hazard areas, or within or abutting landslide or erosion hazard areas, and potentially vulnerable to a greater risk of damage from these events.

Impacts Specific to the No Action Alternative

Under this alternative, no changes to the zoning map or land use would occur. It still assumes growth, particularly in the vicinity of the Sumner Meadows Golf Course for employment purposes. Developments in this area would be within the seismic and volcanic hazard areas. Some future residential development could occur on the Sumner East Hill, which may subject future growth to the potential for erosion or landslide hazards.

Impacts Specific to the Minimal Zoning Action

Impacts in the current plan area would be similar to those described in Impacts Common to All Alternatives and Alternative 1.

In East Sumner, impacts from this alternative will be similar to the No Action Alternative since it only involves changes to zoning designations and minor improvements to existing development (Main Street improvements). Future developments occurring as a result of the new zoning changes would need to comply with current building standards and may need to undergo geotechnical analysis as necessary. Future population and employees would be subject to potential geologic hazards such as the seismic and volcanic hazards prevalent along the valley floor, though there would be less growth than for Alternative 3, the Assertive Collaborative Action.

Impacts Specific to the Assertive Collaborative Action

Impacts in the current plan area would be similar to those described in Impacts Common to All Alternatives and Alternative 1.

In East Sumner, this alternative proposes several infrastructure developments including a new major roadway between 160th Ave E and Sumner Tapps Hwy E as well as a north-south local road between 64th St E and 60th St E. This area will be rezoned to allow more intense commercial and mixed-use development. The higher intensity land use will increase populations in this area that are subject to potential geologic hazards such as the seismic and volcanic hazards. Future developments occurring as a result of the new zoning changes would need to comply with current building standards and may need to undergo geotechnical analysis and flood plain analysis as necessary.

The Assertive Collaborative Action alternative also involves the most earth disturbance of the alternatives. This will occur in areas that are primarily classified with prime farmland soils, according to the USDA's Web Soil Survey. The area is occupied by open fields and residences but is not actively used for commercial agriculture.

Mitigation

Incorporated Plan Features

No additional geologic related plan features are incorporated into this update. Existing policies will remain in effect, such as those in the Environmental Element of the current Comprehensive Plan.

Applicable Regulations and Commitments

- The City has adopted the International Building Code (SMC 15.08.010) and a City Erosion Control Ordinance (SMC 16.05) to reduce impacts caused by earthquakes, soil instability and erosion.
- Critical areas ordinances provide restrictions and regulations on certain types of development, and provides notices and reporting requirements for development within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas (SMC 16.50, 16.52, and 16.54.)

Other Potential Mitigation Measures

- The City could continue to adopt an emergency management ordinance for the reduction of risk from situations like earthquakes and volcanic eruptions or mudflows as part of the Pierce County Emergency Management System.
- The City could pursue implementation of mitigation measures outlined in the Pierce County Natural Hazard Mitigation Plan.
- Conditions of approval for future development may 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.

Significant Unavoidable Adverse Impacts

Since the majority of the City is within seismic and volcanic hazard areas, any development within these areas poses an increased risk to structures and the people living or working in them. Implementing current building codes and critical areas regulations will reduce potential risks or allow for notification of potential hazard areas.

3.2 Flooding

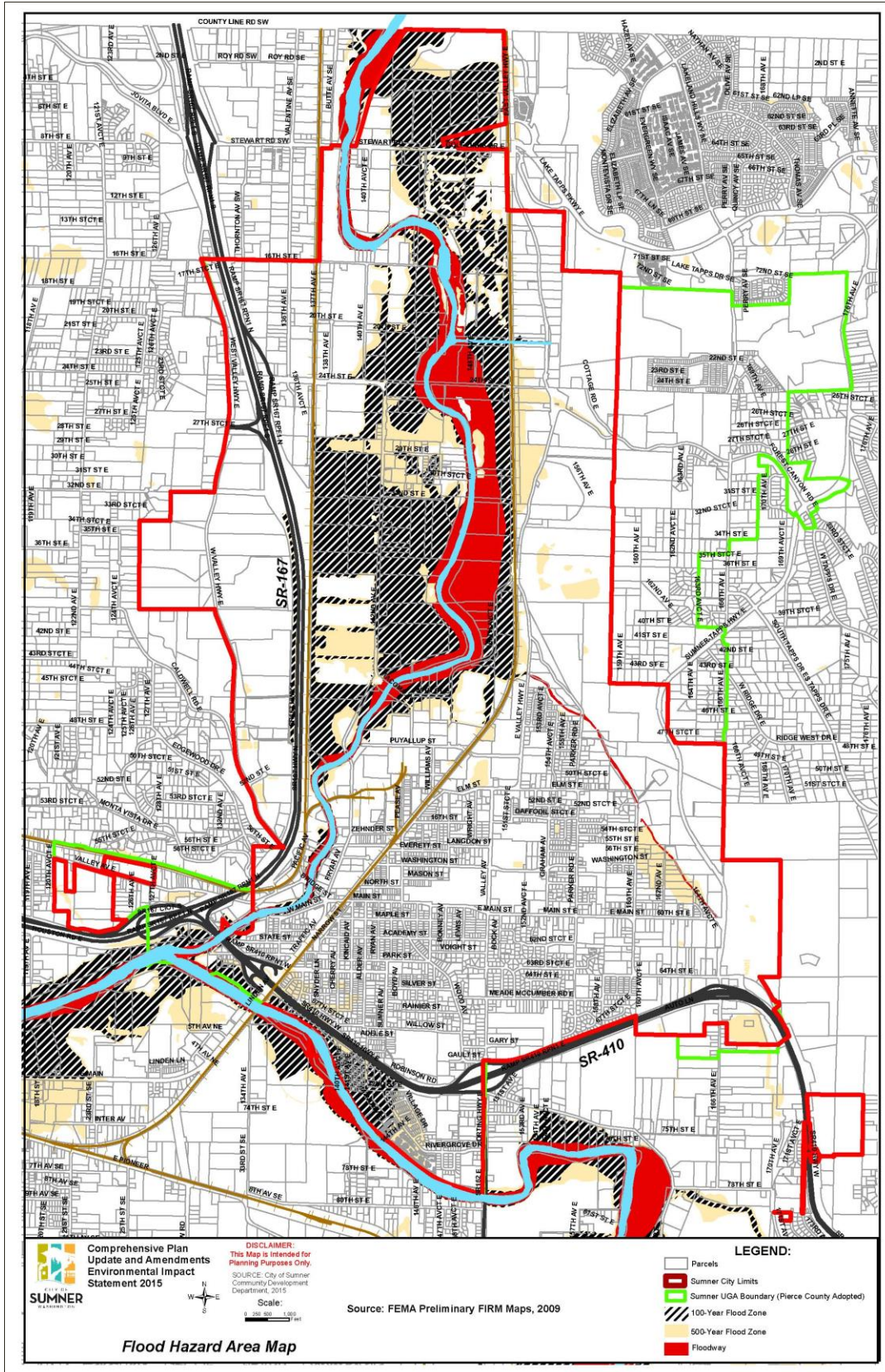
This section addresses the potential impacts associated with flooding under the plan alternatives. Specifically, it examines the difference between the existing flooding risk and the flooding risk posed by the alternatives.

Affected Environment

Citywide

Within the study area, there is regulated 100-year floodplain for the White and Puyallup Rivers; see Exhibit 3-5. The largest flood hazard area is within the industrial use areas in the northern portion of the City, along the White River. This is where high amounts of sediment is deposited and causes the river to be flatter downstream and steeper upstream. In particular, the reach near the Stewart Road Bridge has been rapidly aggrading. When a 100-year flood event occurs, flood waters overtop the left bank's levee and cover Stewart Road and the former Sumner Meadows Golf Course. Additionally, in the area downstream of Stewart Road, floodwaters overtop the left overbank and inundate the area between the White River and the BNSF railroad tracks that run along the east side of the valley. The combined flows then overflow the outlet channel coming from Lake Tapps (Dieringer Flume) and rejoin the White River just below 32nd Street East. Other common flood areas occur on the right overbank of the river downstream of Stewart Road Bridge in the vicinity of the large bend near the warehouses. Flows are directed back to the river by 24th Street E. Downstream of 24th Street E, some water spills over the right overbank and results in shallow flooding between the river and SR 167 as far south as the railway bridge to the north of Main Street.

Exhibit 3-5. Flood Hazard Area Map



Source: City of Sumner 2015

Floodplain regulations in Effect

Development (i.e. adding fills) within the floodway and floodplain may increase surface water elevations during flood events, thus increasing the area affected by floodwaters unless mitigation measures are enacted to compensate for the increased elevations.

The City of Sumner currently implements the floodplain regulations required by the National Flood Insurance Program (NFIP) and through its Shoreline Master Program (SMP) and critical areas regulations (Sumner Municipal Code [SMC] 16.58 and 15.52). Currently, no fill, new construction or substantial improvements are permitted in the floodway (with exceptions that state the improvements cannot increase the water surface elevation more than one foot).

The Shoreline Master Program (SMP) also states that:

Shoreline developments and activities shall not increase the base flood elevation by more than one (1) foot, unless appropriate legal documents are prepared in which all property owners affected by the increased flood elevations consent to the impacts on their property.

The National Marine Fisheries Service (NMFS) provided a biological opinion in 2008 on the effects of FEMA's National Flood Insurance Program (NFIP) on endangered species protected under the Endangered Species Act (ESA) (discussed in the Comprehensive Plan Update EIS in 2010). The biological opinion included reasonable and prudent alternatives (RPAs) that govern how the NFIP can be implemented along streams and rivers that support listed salmon populations. One of the RPAs regarded restriction of development within the 100-year floodplain. It specified that affected communities:

- Either prohibit all development in the 100-year floodplain; or
- Allow development to proceed only if ecological functions of the floodplain are preserved or compensated (i.e. mitigated).

The City of Sumner currently reviews impacts on the ESA on a permit by permit basis through preparation of Habitat Management plan and annual agency consultation.

East Sumner

There are no major FEMA designated flood hazards within the East Sumner Neighborhood. The only surface water body in this area is Salmon Creek, which ranges from only a few feet wide to 10 feet wide, on average. The majority of Salmon Creek is not mapped with a 100-year floodplain. However, recent hydraulic modeling of the creek shows areas of inundation, largely in locations with lowland wetlands that should be zoned appropriately.

Impacts

This section examines the alternatives for impacts on flood risk.

Impacts Common to All Alternatives

In general, real estate and infrastructure development has impacts to the floodplain. Development that involves an increase in impervious surfaces such as pavement and rooftops increases the amount and velocity of runoff that eventually is discharged to area streams and rivers. Development often involves reduction of vegetated areas (sometimes including wetlands) that would normally help infiltrate this runoff and reduce the amount ending up in rivers.

Since all alternatives provide opportunity for future new developments within the floodplain, all alternatives have the potential to impact the floodplain by increasing the amount of structures, fill, and impervious surfaces. Specific developments that are already proposed were considered and applied to develop a hydraulic model of the lower White River. This was described in the Sumner Meadows EIS (City of Sumner 2014). The specific developments that were assumed to have taken place are the:

- Industrial development and filling on the former Sumner Meadows Golf Course
- King County Levee project

- 24th Street Bridge
- Left bank improvement

The cumulative effects of these projects were incorporated into the hydraulic model and compared to the existing condition. These projects would result in an increase of water surface elevations between 0.5 and 1.5 feet (West 2014).

A 'no-rise' scenario is proposed as part of all alternatives, including No Action and the Minimal Zoning and Assertive Collaborative Action Alternatives, since this policy was studied and recommended as part of Comprehensive Plan and zoning amendments in the 2014 docket. If a development is anticipated to result in an increase in base flood elevations, it will be required to conduct flood storage mitigation in order to result in a net zero rise. This will ensure future development will not contribute to the flood zones of downstream properties.

In order to utilize the zero net rise consideration, the hydraulic study proposed several conceptual flood conveyance enhancement actions which will therefore result in no rise in surface water elevations due to the planned developments. See the mitigation section below for more detail.

Impacts Specific to the No Action Alternative

This alternative involves keeping the future land use and zoning consistent with current designations as of 2014 across the City.

The White River valley is at greatest risk of flood events and has the greatest potential for new light industrial development such as north and south of Stewart Road. The largest single development is planned at the former Sumner Meadows property; such development would have floodplain storage impacts. To compensate for these impacts, several regional flood hazard reduction and protection measures are proposed as described above (e.g. King County levee project; Sumner 24th Street Bridge and left bank improvement).

Impacts Specific to the Minimal Zoning Action

As development is already permitted in any alternative for the Sumner Meadows and the Fleishmann property, impacts would be the same as the ones common to all alternatives and the No Action Alternative.

The Minimal Zoning Action alternative will not directly lead to an increase in impacts compared to the No Action Alternative since it only involves changes to zoning designations and improvements to existing development (Main Street improvements). The change in zoning within the East Sumner Neighborhood will not lead to developments that significantly impact the floodplain since it is not within the FEMA designated 100-year floodplain of the White or Puyallup Rivers. However conveyance improvement along Salmon Creek should be study and implement prior to any filling along Salmon Creek.

Impacts Specific to the Assertive Collaborative Action

Impacts in the current plan area would be similar to those described in Impacts Common to All Alternatives and Alternative 1.

In the East Sumner Neighborhood future infrastructure improvements and higher intensity development would occur outside of the White or Puyallup River floodplains. Therefore this alternative essentially does not result in an increase of floodplain impacts compared to the impacts common to all alternatives. However provisions will have to be put in place to avoid potential flooding along the Salmon Creek. Floodplain modeling has been conducted for existing hydraulic conditions at Salmon Creek and further studies are required if development occurs within its floodplain.

Mitigation

Incorporated Plan Features

- The existing *City of Sumner comprehensive Plan* contains goals and policies related to floodplain development and environmentally sensitive areas. All alternatives retain these goals and policies

and the two action alternatives include consideration of additional policies that address flooding as outlined below.

- Under the No Action Alternative, the 2014 Sumner Meadows EIS tested and recommended a zero rise policy and studied habitat and flood hazard reduction projects. The Action Alternatives include a Best Available Science Review and recommended update of the Critical Areas Regulations to include adoption of a zero-rise policy studied in 2014.

Applicable Regulations and Commitments

- The City will continue to implement requirements of the NFIP to protect new and existing development in and near floodplains.
- The City has adopted the Washington State Department of Ecology (Ecology) Low Impact Development Manual (LID) and a requirement for LID approaches to stormwater management for new development.
- The City will continue to cooperate with Pierce County Water Programs and King County implement conveyance improvements required along rivers.
- The City will continue to enforce the Shoreline Master Program and critical area regulations as currently adopted or as amended in the future.

Other Potential Mitigation Measures

- Several regional floodplain conveyance and connectivity improvements are proposed as part of the 24th Street Bridge or standalone projects that would result in no increases in water surface elevations during the 100-year flood event. This will improve flood storage and eliminate inundated areas currently present in the Stewart Road light industrial lands and other downstream areas. These floodplain enhancement areas are proposed primarily along the left (east) bank of the White River between approximately Stewart Road East and 142nd Avenue East/Tacoma Avenue. This includes areas that are currently the most often inundated from flooding. The work would include excavation of the overbank to provide additional floodwater storage, planting of native riparian vegetation and installation of habitat structures.
- In addition to current plans and regulations the City should:
- Implement a zero-rise policy for development in floodways and floodplains
- Add new Comprehensive Plan policies to further support Low Impact Development (LID)
- Consider district stormwater treatment facilities in East Sumner.
- Consider other options for complying with the Biological Opinion, including:
 - Restrict development in the 100-year floodplain
 - Adopt the model ordinance
 - Submit City regulations and a checklist to document compliance under existing regulations.
- Conceptual floodplain enhancements are modeled to prevent a net rise in surface water elevations if the assumed developments occur. If any other developments occur that are not included in the model, additional analysis and mitigation strategies would need to be conducted to meet City requirements.

- Implementation of stream conveyance improvements for Salmon Creek. This includes the proposed realignment of a portion of Salmon Creek near its crossing under E Valley Highway E.

Significant and Unavoidable Adverse Impacts

All new development within the effective base flood elevations would increase current flood elevations through the placement of fill and reduction of flood storage. This could increase the area affected by floods and/or the time it takes for flood waters to recede. Implementation of the City's flood hazard regulations, shoreline master program, procedures to comply with the Biological Opinion, proposed zero rise policy and habitat enhancement and flood hazard mitigation projects would reduce impacts. Requirements for monitoring and periodic hydrologic modeling as well as enforcement of regulations should allow the City to adaptively manage floodplain development.

3.3 Plants and Animals

Affected Environment

This section addresses the potential impacts on plants and animals under the plan alternatives. Specifically, it examines the potential impacts to plants and animals under existing conditions to the plan alternatives.

Citywide

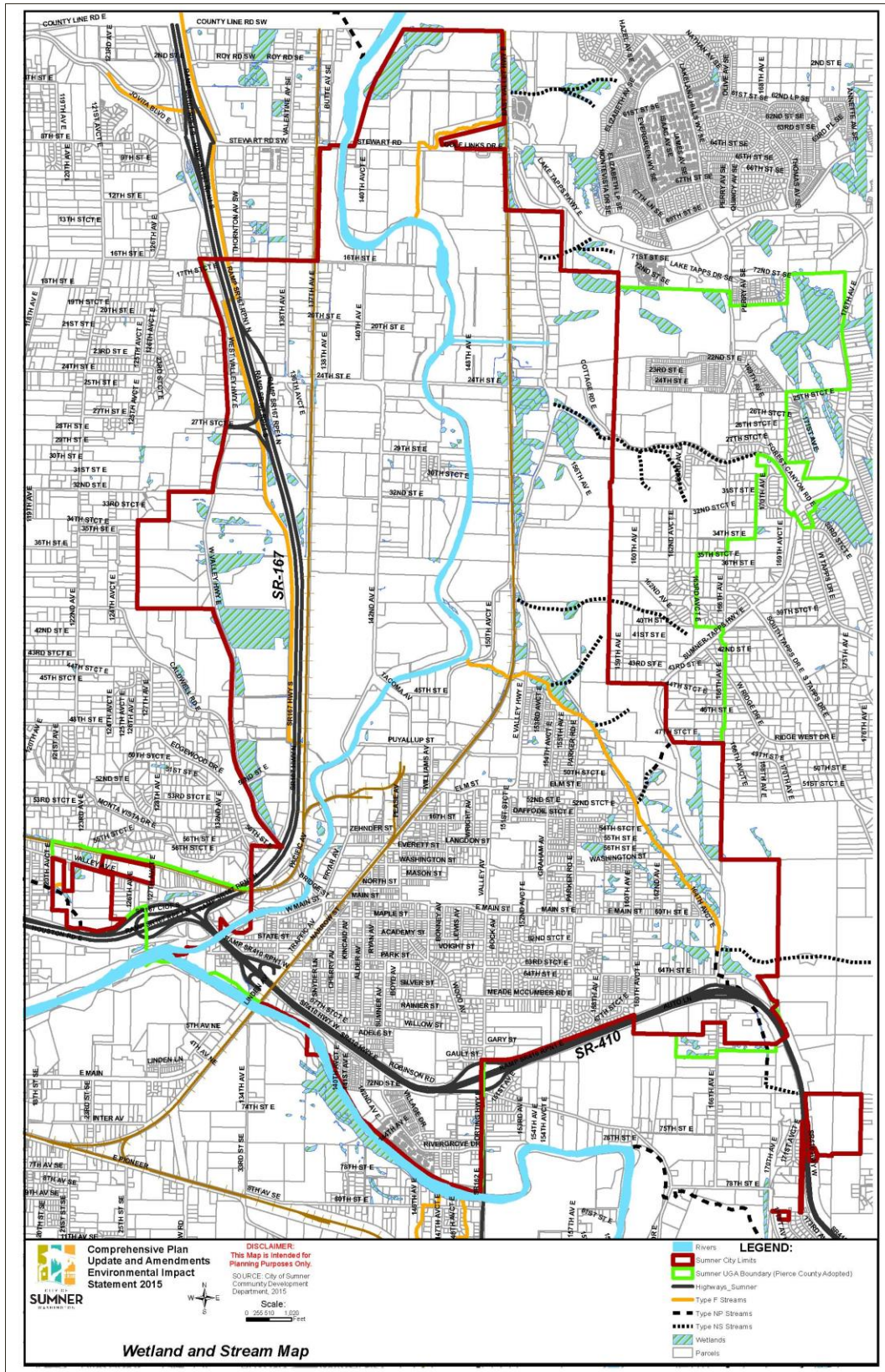
The City of Sumner has a variety of natural habitat types including aquatic, riparian, wetland, forested, and agricultural open space. Other areas are converted from agriculture to urbanized development. Major wildlife corridors include the White and Puyallup Rivers, Salmon Creek and their riparian buffers.

Rivers and streams within the study area are generally affected by channelization, levees, and the close proximity of residential, industrial, and commercial land uses. Development often directly abuts or encroaches on the riparian buffer of the rivers and streams. This reduces connectivity of rivers and streams with their natural floodplains, creating more area that is affected by floods, and reduces quality and complexity of aquatic/riparian habitat. Common vegetation in riparian areas within the study area includes invasive species such as reed canary grass and Himalayan blackberry. Other common vegetation is deciduous trees such as red alder, black cottonwood, and willows.

According to the Washington Department of Fish and Wildlife's (WDFW) Priority Habitat and Species (PHS) lists and existing City maps, there are wetlands along the western edge of city limits, west of SR 167, along the East Valley Highway corridor, along Salmon Creek, and smaller patches of wetland in south east Sumner (East Sumner Neighborhood). Regulated wetlands include swamps, marshes, bogs, and similar areas, but do not include artificial wetlands such as irrigation and drainage ditches, grass-lined swales, canals, detention facilities, farm ponds, and landscape amenities. Wetlands are important for providing habitat, storm and flood water storage and filtration, groundwater recharge, recreational/educational opportunities, and shoreline protection. WDFW's PHS list also identifies a large biodiversity corridor within the hillside in the south and eastern portion of the study area. See Exhibit 3-6 for a map of wetlands and streams.

Wildlife utilizing this corridor and other open space within the study area include terrestrial species commonly found in developed suburban environments such as raccoon, opossum, squirrels, skunk, other small rodents, crows, woodpeckers, red-tailed hawk, and songbirds. Wetlands and riparian areas are utilized by great blue herons and waterfowl. Species recorded within the White and Puyallup Rivers include Coho, Pink, Chinook salmon, Bull trout, Steelhead trout, and Cutthroat trout. Of these, the US Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) lists Bull trout, Chinook salmon and Steelhead trout as threatened under the Endangered Species Act (ESA).

Exhibit 3-6. Wetlands and Streams



Source: City of Sumner 2015

East Sumner

Land in the East Sumner Neighborhood is currently used for residencies, a few commercial properties, agricultural fields, and open space. There are mapped wetlands within portions of the East Sumner area. According to the USFWS National Wetland Inventory application, they are freshwater emergent or forested wetlands. They are primarily located between 60th St E and 64th St E, west of Sumner Tapps Highway E., as well as within the riparian areas associated with Salmon Creek. They provide low to moderate water quality function and habitat value. Some of the wetlands are actively mowed and do not provide any habitat value. The maintained fields and other open space in the vicinity provide habitat for accustomed urban species.

Salmon Creek runs south to north along the eastern end of the East Sumner Neighborhood. It is primarily straightened and channelized in this area but has a narrow band of forested riparian buffer consisting of red alder, black cottonwood, willow, and scattered coniferous trees. It is mapped as being a migration corridor for Steelhead trout, Coho, Chinook, Chum, and Pink salmon by WDFW (WDFW 2014) and is mapped as a type 'F', fish bearing stream by the Department of Natural Resources (DNR) (DNR 2014). According to spawner surveys conducted by the Puyallup Tribe for the study period between 1991 and 2010, an average of 16 Chinook, 7 Coho, and 56 Chum return to Salmon Creek annually.

Impacts

Impacts Common to All Alternatives

As all alternatives provide opportunity for development within areas that are currently vegetated, they all have the potential to impact low quality habitat for urbanized species.

Vegetation

Development of any form would have direct impacts on vegetation through the physical removal of vegetation whether it is native vegetation or landscaped. Disturbances could also result in a higher recruitment of non-native plant species that tend to establish quickly and colonize in areas where soils have been disturbed. Impacts to wetland vegetation would reduce the amount of water filtration from stormwater runoff that they collect.

Fish and Wildlife Habitat

Development of vacant or underdeveloped properties could lead to habitat fragmentation and loss of habitat connectivity. This further reduces the biodiversity of the larger area. Development and increases of impervious surface also reduce quality of aquatic habitat directly and indirectly. It could impact aquatic habitat directly through the conversion of habitat to less suitable habitat or reduction of habitat and by potentially introducing sources of pollution that may enter the water body. It impacts aquatic habitat indirectly by increasing peak flows, reducing low flows, and increasing water temperatures from runoff and reducing the amount of shade. Impacts to aquatic habitat would be minimal from any of the alternatives due to the regulations in place required prior to any individual development project occurs. This includes but is not limited to buffer requirements, allowable in-water work windows, tree preservation/mitigation requirements, and water quality treatment requirements.

Impacts Specific to the No Action Alternative

This alternative would imply the same impacts to vegetation and wildlife and their habitats as those described under the previous section, 'impacts common to all alternatives'. Under the No Action Alternative, previously approved and planned developments would occur to areas that are currently underdeveloped. In valley lands, such as large parcels remaining for development in vacant and zoned light industrial areas along Stewart Road or East Valley Highway, this would cause disturbance to species that utilize open fields and fragmented wetland features. Developments along East Hill could disturb forested habitats.

In East Sumner, impacts would be at a smaller scale than the other alternatives (especially alternative 3) since no additional specific infrastructure improvements are proposed in East Sumner under this alternative.

Impacts Specific to the Minimal Zoning Action

Citywide and in the UGA, this alternative would not result in any additional direct impacts to vegetation and wildlife beyond those described in the ‘impacts common to all alternatives’ and those described for Alternative 1. Changes to development regulations will not result in any impacts to fish/wildlife or their habitats since they only consist of change in use of areas that are already disturbed and developed, e.g. Wood Avenue reclassification. The application of the Residential Protection zone in place of the AG zoning would substitute a protective zone with low impervious area for a similar protective zone; the City would still be subject to a prior agreement with federal services to limit impervious areas on this property, and therefore impacts are not anticipated.

In East Sumner, this alternative only involves zoning changes and minor improvements to East Main Street. It would allow for higher density developments (mixed use, multi-family residential, retail) compared to the existing low level uses (low density residential) for the East Sumner area. However, individual development proposals would need to comply with critical areas regulations even if a planned action or infill exemption ordinance is approved.

Impacts Specific to the Assertive Collaborative Action

Citywide and UGA development patterns and impacts are similar to Alternative 2 except that an area along East Valley Highway with smaller lots would be reclassified from MDR to M-1 zoning, both urban zones with a potential for greater impervious area, particularly M-1. This would produce impacts similar to those described for Impacts Common to All Alternatives.

The Assertive Collaborative Action alternative would ultimately have increased potential impacts to plants and wildlife compared to Alternatives 1 and 2, due to its proposed infrastructure improvements within the East Sumner Neighborhood. The new roads would result in direct impacts to vegetation, wetlands, and increases in impervious surface. Wetland mitigation would be necessary from these proposals and would most likely occur off-site. Well planned off-site wetland mitigation would be beneficial compared to existing wetlands since it would provide more connected habitat compared to existing fragmented patches of wetland. It would also provide improved habitat complexity with the planting of native species compared to the non-native or invasive species that currently occupy much of the existing wetlands.

Mitigation

Incorporated Plan Features

- The No Action Alternative would continue Environmental Element policies while Action Alternatives 2 and 3 would update the Element and implement a Best Available Science Review of critical areas regulations.
- Mitigation for the new street(s) and infrastructure improvements is included in Alternative 3. It proposes establishment of a wetland mitigation bank within public property south of 24th Street and on the west side of the river which will be utilized to obtain mitigation credits for impacts to wetlands from the road projects. A larger connected mitigation bank would improve habitat value and water treatment functionality compared to the existing patches of fragmented wetlands within the East Sumner Neighborhood. The bank would use a watershed approach to integrate the wetland function into the comprehensive flood management plan.
- The Assertive Collaborative Action alternative provides improved wetland and wildlife habitat as well as a significantly improved capacity towards economic growth and development. It advances the City towards the goal of having an urban village in East Sumner which would also help reduce single occupancy travel by promoting walkability and transit use.

Applicable Regulations and Commitments

- City of Sumner Shoreline Master Program (SMP)

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
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- NFIP and compliance with the Biological Opinion
- Critical Area Regulations that address wetlands, streams and wildlife habitat areas
- City of Sumner stormwater regulations and implementation of the National Pollutant Discharge Elimination System (NPDES) requirements

Additional Mitigation Measures

- The City could work with the Pierce County Biodiversity Alliance to develop a stewardship plan for the White River.
- Restoration of select locations along Salmon Creek. Proposed conceptual restoration locations are east of Parker Rd E, near the utility access road and northeast of the intersection at 45th St. Ct. E and 154th Ave Ct. E. These improvements would involve the removal of invasive species (reed canarygrass), planting of native riparian vegetation, and installation of habitat features (i.e. large woody debris and large boulders.) Restoration of Salmon Creek would provide improved habitat for spawning salmon and result in an increase in salmon returns and therefore fry production.

Significant and Unavoidable Adverse Impacts

All future development would likely have some impact, direct or indirect, to local plants and animals. However, the plan area development and infrastructure improvements proposed under all alternatives are within areas that have been previously disturbed by agricultural activity or are otherwise in areas of low quality habitat. Due to restrictions placed on certain properties the White River buffer by the Biological Opinions and City regulation, no significant adverse impacts are anticipated.

3.4 Water Resources

Affected Environment

Citywide

The City of Sumner is within the White River Watershed of WRIA 10 (Puyallup-White). Sumner has a high concentration of industrial use as well as agricultural use. Water quality is therefore consistent with conditions typical of urbanized or suburban areas. Water quality conditions are influenced by increases in impervious surfaces and the associated stormwater runoff that ends up in surface waters (non-point sources). This can also include chemical loading from agricultural practices. Residue from herbicide, pesticide, and fertilizer treatments can be swept with stormwater runoff and eventually reach surface water bodies. Other sources of possible contamination to water quality in the area are direct discharge (point sources) of pollutants into water bodies (i.e. factories). Polluted runoff or discharge can seep into the aquifer and contribute to groundwater contamination.

Surface Water

The major surface water bodies within the City of Sumner are: the White River (a Type I stream), Puyallup River (a Type I stream), Salmon Creek (a Type III stream), and Sotain Creek/Milwaukee Ditch (a Type III stream). Other streams are: Stewart Road Creek (Type III), and the Dieringer Flume. Stream types are as shown on the current City of Sumner Fish & Wildlife Habitat Area Map. DNR stream types equate to type S (shoreline) for type I streams, and type F (fish) for type II and III streams.

WHITE RIVER

The lower portion of the White River runs north to south in the middle of the city. The White River originates from the Emmons and Fryingpan glaciers on the north face of Mount Rainier and flows 68 miles from the mountain source to its confluence with the Puyallup River (SSDC 2007, Kerwin 1999). It has a drainage area of approximately 494 square miles. The lower White River is regulated by the Mud Mountain Dam at river mile 28 which diverts upstream flows to Lake Tapps. These flows rejoin the White River through the Lake Tapps diversion or the Dieringer Flume, located at approximately river mile (RM 3.6). The river is also subject to flood control modifications such as diking, levees, and gravel removal to deepen the channel. Levees reduce floodplain connectivity and increase peak flows within the main channel, therefore also causing increased flood water elevations further downstream (unless the levees are breached). Due to the extensive flood control efforts, habitat elements such as pool frequency, refugia, and off channel habitat are not properly functioning within the lower White River.

The White River has typical sediment loading issues of a glacial fed river system. The upper portion cuts through glacial and mudflow deposits and therefore transports a lot of sediments. It has been estimated to transport about 440,000 to 1,400,000 tons of sediment annually. The sediments are deposited in the lower reaches (including the vicinity of Sumner) which cause aggradation and flooding problems in the river valley (Kerwin 1999).

There are three segments of the White River within City limits that are currently listed on the Washington State Department of Ecology's 303(d) list of impaired waters of the state (Ecology 2012). The 303(d) list identifies all assessed waters within the state that are impaired by pollutants and do not meet state surface water quality standards and are not expected to improve within the next two years. The assessed waters are placed in categories that describe the status of water quality. Category 5 waters are those polluted waters that require a total maximum daily load (TMDL) or other water quality improvement (WQI) plan. These make up the 303(d) list. The reach of the White River from the northern City limits to approximately 1.5 miles downstream is listed as a Category 5 water for pH and temperature. It is also listed as a Category 4c water for instream flow. Category 4c waters are impaired by a non-pollutant or waters that are impaired by causes that cannot be addressed through a TMDL. A second segment from the vicinity 32nd Street East to 1.3 miles downstream is listed as Category 5 for temperature. A third 0.2 mile segment is listed as Category 5 for temperature near the confluence with the Puyallup River. No other waterbodies are listed on the 303(d) list within City limits.

SUMNER COMPREHENSIVE PLAN UPDATE SEIS AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION

The outfall of Sumner's municipal wastewater treatment plant is on the White River just upstream of its confluence with the Puyallup River. It is regulated by the EPA and Ecology under the National Pollutant Discharge Elimination System (NPDES) program.

PUYALLUP RIVER

The Puyallup River forms a southwest border of city limits. Within this reach, the river has been substantially altered through channelization and loss of riparian and off-channel habitats. The river originates from the Klapatche area on the southwest slopes of Mount Rainier and drains to Commencement Bay. Summer low flows in the Puyallup River have declined continuously since at least 1980, despite the closure on new surface water withdrawals and the establishment of minimum flow requirements (Kerwin 1999). The lower portion of the Puyallup River only provides a migration corridor for salmonids as it has been dramatically altered and restricted by human developments. No portions of the Puyallup River within the City of Sumner are listed on Ecology's 303(d) list.

SALMON CREEK

Salmon Creek originates in the Orton Junction area and is joined by several small Type 4 (DNR type Np, non-fish perennial) and Type 5 (DNR type Ns, non-fish seasonal) tributary streams. Salmon Creek then flows northwest to its mouth at the White (Stuck) River. The creek is surrounded by steep slopes to the east throughout much of its length. It is surrounded by primarily residential land use. The steep slopes provide priority habitat and is listed on WDFW's PHS list as a 'biodiversity corridor'. The stream provides habitat for Coho, Chum, and Chinook salmon, and Steelhead and Cutthroat trout. It has been used in the past for stormwater conveyance and contains several stormwater discharge outfalls. It also has a number of culvert related fish passage issues. It is approximately 3-4 feet wide at its upper reaches and up to 10 feet near its mouth.

SOATIN CREEK/MILWAUKEE DITCH

This creek runs from its mouth on the west bank of the White River near Puyallup Street and continues northward along SR167 to the northern city limits at 16th Street East. It is heavily channelized by SR167 and former agricultural land uses. The stream generally ranges from 3 to 4 feet wide in its northern reaches and from 8 to 10 feet wide near its mouth.

STEWART ROAD CREEK

This stream is the result of relocating the Eighth Street Creek from the vicinity of the Lake Tapps Parkway Stormwater Treatment Pond, where it flowed east to west along Stewart Road and south through agricultural fields to the White (Stuck) River. The stream was moved approximately 700 feet to the east. Stewart Road Creek, as completed, is a new stream channel that meanders approximately 1,600 feet from Stewart Road to within 175 feet of the White (Stuck) River and then flows through an existing wetland and culvert. The streambed was graveled, large woody debris installed, and native vegetation planted to improve habitat function and complexity. The area will continue to be maintained and monitored over the next 5 to 10 years. According to WDFW's PHS mapper, the creek is utilized by Steelhead trout, Cutthroat trout, and Coho salmon. Additional habitat restoration is proposed along this stream.

DIERINGER FLUME

The Dieringer Flume is a manmade channel running east-west from East Valley Highway East to the White River approximately 0.2 miles north of 24th Street East. The channel is approximately 60 to 70 feet wide with boulder/cobble substrate. Water levels and flow rates in the channel are controlled by Cascade Water Alliance, which maintains the powerhouse and canal. This is where water from Lake Tapps re-enters the White River. Migrating adult salmonids may enter the canal from the White (Stuck) River during high velocity flows in the summer and fall.

Groundwater

The majority of the City of Sumner is located within a highly susceptible wellhead protection (10-year travel time) area (DOH 2008). See Exhibit 3-7. The City's municipal water supply is from three spring fields on the east hill: Sumner Springs, Crystal/County Springs, and Elhi Springs. Three wells are also used to meet peak water demands in the summer. These are the west well, south well, and the Dieringer

well. Groundwater quality is tested on an annual basis for organics and inorganics. There was no detection of herbicides or pesticides in a 2013 test on the Crystal/County Springs well.

East Sumner

The only surface water body in this area is Salmon Creek. Salmon Creek runs along the southeastern perimeter of the East Sumner Neighborhood and cuts through the northeastern corner before flowing to the White River near RM 2. There are also several wetland areas within the East Sumner Neighborhood between 60th Street East and 64th Street East, west of Sumner Tapps Hwy East. There are also wetlands associated with Salmon Creek. There are no impaired waterbodies within East Sumner.

Impacts

Impacts Common to All Alternatives

In general, population growth and development have direct and indirect impacts to local water quality. The increase in population, work force, and therefore businesses could result in higher potential for releases of pollutants to surface waterbodies. Increased traffic volumes produce more stormwater that requires treatment prior to discharge. Increased development and impervious surfaces often result in less vegetation coverage that can naturally filter runoff. It also results in higher runoff volumes entering the surrounding rivers and streams and reduces groundwater recharge rates. The majority of the City of Sumner is within the critical aquifer recharge area and therefore is susceptible to groundwater contamination. Potential sources of contamination that can impact groundwater sources are leaks or releases of petroleum products, pesticides, fertilizers, herbicides, and septic systems.

Impacts Specific to the No Action

Since this alternative maintains the existing Comprehensive Plan policies, land use and zoning the impacts would be consistent with those identified under Impacts Common to all Alternatives. Under this alternative, growth will still occur in terms of the industrial use of the Sumner Meadows Golf Course and normal surplus capacity for the 2035 projected population, housing and employment growth. Water quality will be affected by normal growth rates. All approved development has incorporated appropriate stormwater treatment measures such as LID per City code into their design and no substantial impacts are anticipated.

Impacts Specific to the Minimal Zoning Action

In the current plan area, impacts would be similar to those identified under Impacts Common to all Alternatives. The changes in commercial to industrial zoning at Wood Avenue would not affect the level of urbanization and all development would have to comply with the City's stormwater requirements. The area along East Valley Highway would have a slightly lesser impervious area than if converted to M-1 as under Alternative 3. The AG property would be applied the Residential Protection zoning, a district designed for environmentally constrained properties and with a low impervious surface limit. The application of critical areas regulations and prior agreements with federal services to limit impervious areas would reduce the potential for impacts to water resources.

In East Sumner, this alternative will not directly lead to an increase in impacts compared to the No Action Alternative since it only involves changes to zoning designations and improvements to existing development (Main Street improvements). It would not lead to significant increases in impervious surfaces. Rezoning areas to allow for multi-family residential and mixed use development may have a positive impact to water quality since no additional pollution generating surfaces are immediately proposed. It will allow for more growth at the same time. Appropriate stormwater treatment measures will need to be evaluated and implemented if the rezoning should lead to an increase in parking lots or other pollution generating surfaces.

Impacts Specific to the Assertive Collaborative Action

Impacts in the current plan area would be similar to Alternative 2, except that along East Valley Highway, properties designated for MDR would be rezoned to M-1, where a higher impervious area limit could occur. However, City stormwater standards would continue to apply.

In East Sumner, this alternative involves some major street improvements, including construction of new roadways in lands that are currently undeveloped. This will result in displacement of wetlands which help filter stormwater runoff, store runoff and reduce the amount of runoff that is discharged to the White and Puyallup Rivers. It also means higher capacity of motor vehicles which contribute to petroleum related contaminants entering storm runoff. The collaborative action alternative therefore also proposes a number of actions that will be beneficial to water quality including the establishment of a wetland mitigation bank associated with Salmon Creek (or offsite at the City owned AG property along the White River), and a park along Salmon Creek. The park will help reduce the amount of impervious surfaces in the area and reduce direct impacts since it is a relatively low intensity use.

Mitigation

Incorporated Plan Features

The Comprehensive Plan incorporates goals and in order to protect water quality as required by the Washington State Growth Management Act (GMA). Those goals and policies of the Environmental Element include:

- Monitoring surface water discharges to provide a sufficient data base for determining if water quality is being maintained.
- Working closely with other agencies and adjacent jurisdiction to protect groundwater resources that affect the City's water supply and educate the public about the potential impacts human activity has on water quality within the aquifer recharge area.
- Continue implementation of Low Impact Development (LID) techniques wherever feasible. LID provides methods that improve stormwater quantity and quality control that mimics the natural hydrology of the site as close as possible. The goal of LID techniques is to treat stormwater as a resource rather than a waste product and help preserve natural landscape features. They provide attractive settings while improving stormwater quality/quantity control at the same time. Common techniques include bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. The current Comprehensive Plan includes a policy for incorporating LID principles and practices into the design, construction, and operation of all City facilities and City-funded projects when economically feasible. It also encourages LID use for both public and private developers.

There will be no change to these features by any of the proposed alternatives.

- Alternatives 2 and 3 involve updating critical areas best available science which will provide an improved base line for future protection and restoration activities and to better determine priority restoration areas.
- Alternative 3 proposes establishment of an off-site wetland mitigation bank that can be used for future development projects and will provide improved habitat value compared to existing fragmented wetlands.

Applicable Regulations and Commitments

The City's critical area regulations provide strict provisions for the protection of wetlands, aquifer recharge areas, and buffer zones around local rivers and streams. SMC 16.05 provides regulations relating to the control of erosion and sedimentation to reduce sediment pollution from construction activity. SMC 16.48 regulates development and land use in aquifer recharge areas while SMC 16.46 provides the regulations for development in or near wetlands and requirements for mitigation if filling of wetlands should occur.

Water quality protection is also enacted by SMC 13.48: stormwater management regulations. These regulations "establish minimum requirements and procedures to control the adverse impacts associated

with increased stormwater runoff and water quality degradation for all sites located within the city...”
These regulations also adopt use of the:

- 2012 Ecology Stormwater Management Manual for Western Washington
- NPDES Western Washington Phase II Municipal Stormwater Permit, - Minimum Technical Requirements for New Development and Redevelopment
- 2005 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound

The City of Sumner has recently updated and adopted a revised Shoreline Master Program (SMP) in December 2014. It was approved by Ecology on December 12, 2014 and was effective as of December 26, 2014. The revised SMP regulates approximately six miles of the White River and 1.5 miles of the Puyallup River. Additional measures that protect or restore surface water bodies are included in this document.

Other federal and state regulations in effect to protect water quality are the Safe Drinking Water Act and the EPA’s NPDES Phase II regulations for stormwater management. The Safe Drinking Water Act requires public water system wells to be protected from potential sources of contamination. The EPA authorized the Washington State Department of Health to implement this rule by establishing a Wellhead Protection Program for all current wellhead sources (such as the South Well, Sumner, Weber/Crystal, and County springs). The wellhead protection zones are the 10-year time travel boundary that represents the maximum distance around a pumping well from which a hypothetical contaminant in the groundwater could travel to the well in a 10-year period. The City currently publishes an annual water quality report that summarizes test results of the wells and groundwater sources.

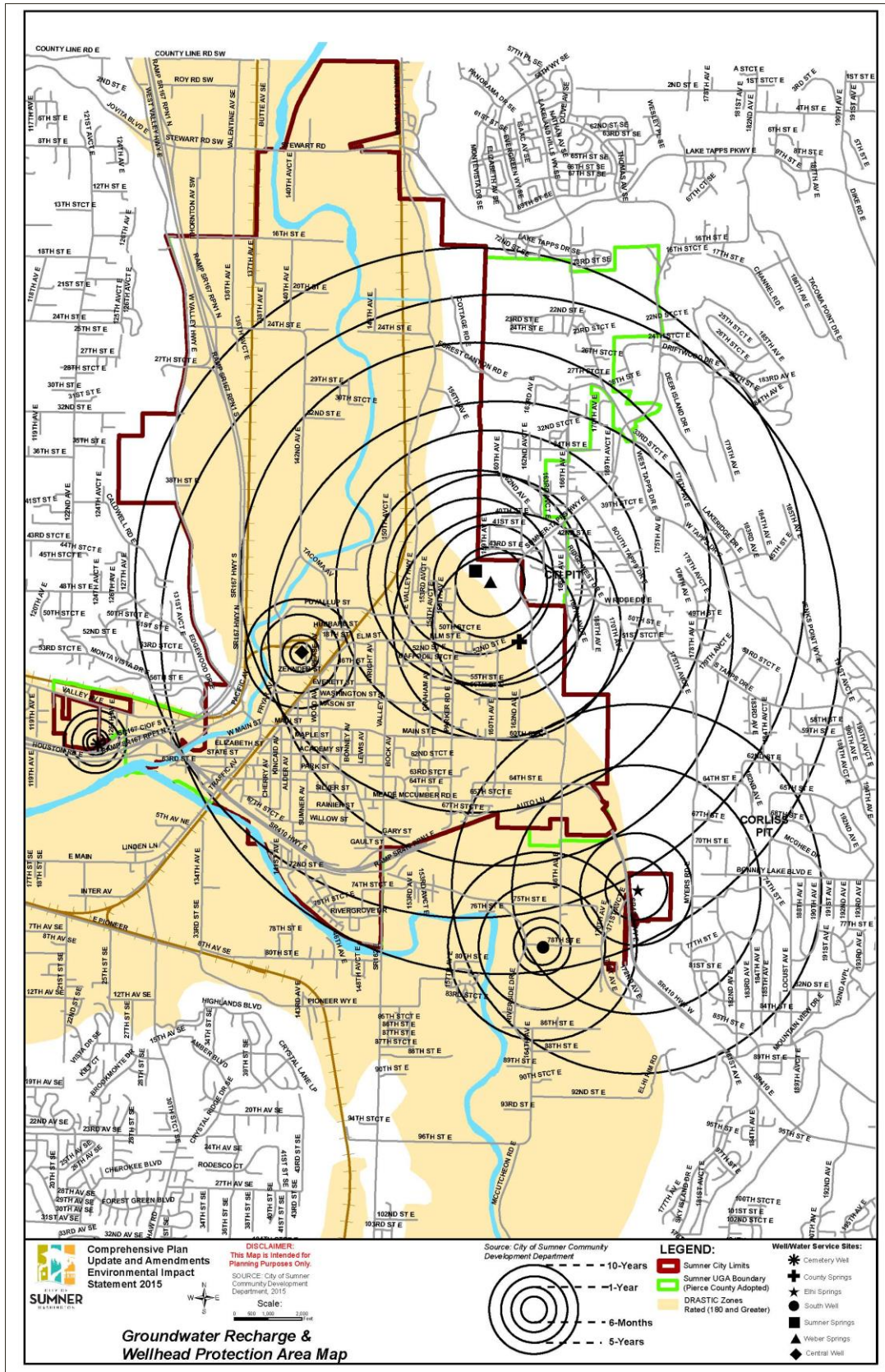
Other Potential Mitigation Measures

None proposed.

Significant Unavoidable Adverse Impacts

Direct impacts would be minimized to less than significant through the implementation of federal, state, and City regulations, including critical area and stormwater regulations. Though alternative 3 proposes a considerable amount of new development, it is less than one hundredth of a percent of the White River watershed and would be insignificant. The alternative also proposes to establish a new wetland mitigation bank which would provide improved stormwater treatment and flow control for the region. LID techniques will be implemented into the design as much as possible.

Exhibit 3-7. Groundwater Recharge and Wellhead Protection Area Map



Source: City of Sumner, 2015

3.5 Air Quality and Greenhouse Gases

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

The study area for evaluation of air quality impacts is defined as the City of Sumner (Sumner) and the central Puget Sound region. Current air quality regulations would prevent new developments and commercial and industrial facilities within the study area from generating unacceptable air pollutant emissions that would affect nearby areas during construction or operation. But regardless which alternative is enacted, population will increase in the study area, and there would be expansion of commercial and industrial space, therefore the air pollutant emissions generated within the study area are expected to increase. Similarly, regional vehicle miles traveled (VMT) by vehicles used by residents and those who work in the study area would also increase, along with the tailpipe emissions generated by those vehicles. However, the VMT generated by the new homes and businesses in the study area would be a small fraction of the overall VMT generated within Puget Sound, so it is unlikely that any of the alternatives would significantly affect regional air quality.

Affected Environment

Existing Air Pollution Sources

Typical air pollution sources in the study area include vehicular traffic –along major roadways, and within the industrial, commercial, and residential areas surrounding the study area– commercial and industrial businesses, and residential wood-burning devices. While many types of pollutant sources are present, the single largest contributor to most criteria pollutant emissions is expected to be derived from on-road vehicles, which contribute most of the carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen dioxide (NO₂), and greenhouse gases (GHG). Secondary sources of emissions include stationary equipment operated for commercial and industrial land uses. Additionally, space heating (e.g., gas and diesel heating equipment) and wood-burning appliance emissions contribute to background air quality.

Key Criteria Air Pollutants

The paragraphs below describe the key air pollutants considered for air quality analyses.

Carbon Monoxide

CO is a product of incomplete combustion generated by mobile sources, residential wood combustion, and industrial fuel-burning sources. CO is a concern related to on-road mobile sources because it is the pollutant emitted in the greatest quantity for which short-term health standards exist. CO is a pollutant with localized impacts which diminishes within a short distance from roadways. The highest ambient concentration of CO usually occurs near congested traffic and during wintertime or periods of air stagnation.

Ozone

Ozone is a highly reactive form of oxygen that is generated by an atmospheric chemical reaction with ozone precursors like nitrogen oxides and VOCs. These precursors are emitted directly from industrial and mobile sources. Transportation equipment like automobiles and trucks also significantly contribute to ozone precursor emissions. Ozone impacts are regional because the atmospheric reactions take time, and during this delay, ozone precursors may be dispersed far from their point of emission.

Particulate Matter (PM₁₀ and PM_{2.5})

Ambient particulate matter is generated by industrial sources, residential wood combustion, motor vehicle tailpipes, and fugitive dust from roadways, haul roads, and unpaved surfaces. When first regulated, limits on particle pollution were based on total suspended particulates, regardless of

particulate size. As sampling technology has improved and the chemical composition has become clearer and the knowledge of health impacts related to particle size has been refined. For example, in some cases, fine particulate matter may have additional inhalation risk associated with transport of toxic substances (adhered to the particle's surface) deep to human lung tissue.

Ambient standards are now revised to focus on the critical size fractions associated with human health impact. Presently, ambient air quality standards are set on particulate matter less than or equal to 10 micrometers in size (PM₁₀) and particulate matter less than or equal to 2.5 micrometers in size (PM_{2.5}) because these groups of particles most significantly impact human health and regional haze. The greatest ambient concentrations of particulate matter generally occur near the point of emission. PM_{2.5} has more influence on ambient air quality at locations farther from the emitting source than does PM₁₀ because the smaller particles remain suspended in the atmosphere for a longer time and travel farther.

Lead

The main source of lead pollution has historically been by the transportation sector, but these tailpipe lead emissions have drastically declined since the Environmental Protection Agency (EPA) implemented regulatory efforts to remove lead from on-road motor vehicle gasoline. The major emission sources of lead currently include lead smelters and metals processing plants or combustion of aviation gasoline. It is unlikely that there are any industrial sources within the City that currently emit substantial amounts of lead.

Nitrogen Oxides and Sulfur Oxides

Nitrogen oxides (NO_x) and sulfur oxides (SO_x) are emitted by mobile sources and fuel-burning stationary sources. Due to the rural nature of the City and the stringent air quality regulations that limit emissions from the City's major industrial facilities, the ambient concentrations of these pollutants have never approached the National Ambient Air Quality Standard (NAAQS) limits. However, NO_x is one of the, previously discussed, ozone precursors that contribute to ongoing ozone issues within the Puget Sound region. Similarly, NO_x and SO_x pollution, from tailpipe emissions, form regional haze and acid deposition in the Cascade Mountains outside the City.

Greenhouse Gases

GHGs are a group of gases that, when present in the atmosphere, absorb or reflect heat that normally would radiate away from the earth and thereby increases global temperature. Several GHG constituents are commonly evaluated: carbon dioxide (CO₂), methane, nitrous oxide, water vapor, O₃, and halocarbons. CO₂ is the individual constituent that is normally emitted in the greatest amount and generally contributes the most to climate change. Each individual constituent has its own global warming potential. To express the average emission rate and global warming potential of the combined constituents, GHG emission rates are commonly expressed as the equivalent amount of carbon dioxide (CO₂e).

Air Quality Regulations

Three agencies have jurisdiction over ambient air quality in the study area: the EPA, the Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA). The EPA established NAAQS for the six criteria air pollutants and specified deadlines for which states are to develop and implement plans to comply. The NAAQS are divided into primary and secondary standards; the former are set to protect human health within an adequate margin of safety, and the latter to protect environmental values, such as plant and animal life. Ecology established the Washington State Ambient Air Quality Standards (WAAQS) for the same six criteria air pollutants that are at least as stringent as the national standards. Exhibit 3-8 lists all the Ambient Air Quality Standards (AAQS) for the six criteria pollutants: CO, ozone, PM₁₀, PM_{2.5}, lead, and NO₂, and sulfur dioxide (SO₂). PSCAA issues air quality permits to industrial and commercial facilities, for equipment that emits substantial amounts of air pollutants.

Exhibit 3-8. National and Washington State Ambient Air Quality Standards

	Federal		State
	Primary	Secondary	
Carbon Monoxide (CO)			
8 - Hour Average	9 ppm	No standard	9 ppm
1 - Hour Average	35 ppm	No standard	35 ppm
Ozone (O₃)			
1 - Hour Average	No Standard	No standard	0.12 ppm
8 - Hour Average ^A	0.075 ppm	0.075 ppm	No Standard
Particulate Matter (PM₁₀)			
Annual Arithmetic Mean	No Standard	No Standard	50 µg/m ³
24 - Hour Average	150 µg/m ³	150 µg/m ³	150 µg/m ³
Particulate Matter (PM_{2.5})			
Annual Arithmetic Mean	12 µg/m ³	15 µg/m ³	No Standard
24-Hour	35 µg/m ³	35 µg/m ³	No Standard
Lead (Pb)			
Quarterly Average	0.15 µg/m ^{3B}	0.15 µg/m ^{3B}	No standard
Nitrogen Dioxide (NO₂)			
1-hour	0.100 ppm	No standard	No standard
Annual Average	0.053 ppm	0.053 ppm	0.05 ppm
Sulfur Dioxide (SO₂)			
Annual Average	No Standard	No Standard	0.02 ppm
24 - Hour Average	No Standard	No Standard	0.10 ppm
3 - Hour Average	No Standard	0.5 ppm	No Standard
1 - Hour Average	0.075 ppm	No Standard	0.40 ppm ^C

^A Eight hour ozone standard went into effect on September 16, 1997. But implementation is limited.

^B Final rule signed October 15, 2008. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

^C 0.25 not to be exceeded more than two times in any 7 consecutive days.

ppm = parts per million

Sources: Environmental Protection Agency website, 2014; Ecology website, 2014.

Air Quality Attainment Status

Based on monitoring information collected over a period of years, the U.S. Environmental Protection Agency (EPA) and Ecology designate regions of “non-attainment” for regulated air pollutants. Non-attainment status indicates that the regional air quality does not meet the NAAQS. A region is considered in “attainment” when the air pollutant levels within that area are consistently below the NAAQS. If the measured concentrations in a non-attainment area improve so that they are consistently below the area may be reclassified as a “maintenance area”.

As of July 2, 2014, the EPA designated Pierce County (including the City of Sumner) as an area of moderate maintenance for CO, ozone, and PM₁₀. Pierce County is currently in attainment for lead and SO₂.

During 2010, the EPA strengthened the 1-hour average NAAQS for NO₂ and in 2012 the EPA finalized the corresponding area designations based on monitoring data from 2008 to 2010. In 2013, the EPA finalized revisions of new NO₂ monitoring requirements. Additionally, in 2012, the EPA set a nationwide designation for the 1-hour average NO₂ NAAQS as “unclassifiable/attainment” (EPA website, 2012). Beginning January 2014, states and local agencies were required to begin operating the near-road component of the NO₂ monitoring network. It is unknown which regions of the country will be redesignated based on the new monitoring data. Presently, Sumner is considered an attainment area for NO₂.

Tacoma-Pierce County PM_{2.5} Non-Attainment Area

In 2006, the EPA revised the daily PM_{2.5} NAAQS from 65 to 35 µg/m³ and in 2009, designated parts of Tacoma and Pierce County as non-attainment for daily PM_{2.5}. The designated non-attainment boundary lies adjacent to Sumner but the western sections of the city (west of SR167) may be within non-attainment jurisdiction. Additionally, all of Sumner is held to the applicable PSCAA regulations and the impacts the City can have on air quality within a non-attainment region. Sumner shares its airshed² with the Tacoma-Pierce County attainment area; therefore, it is important to consider the impacts to these surrounding communities while evaluating the significance of air pollutant emission increases due to the population growth associated with each alternative.

Since designation, PSCAA and Ecology have worked together to improve that regional air quality through development of community programs including regional and statewide regulations. Non-attainment areas are federally required (40 CFR 50 Part Z) to prepare emission inventories to identify the key sources of the subject pollutant. Ecology's 2011 emission inventory of PM_{2.5} sources show that amongst several PM_{2.5} pollution sources, residential wood burning activities contributed to 76 percent of the total PM_{2.5} point source release during for an average winter day (2011). As a result, strategies to improve ambient air quality within the region have focused around residential wood burning and transportation conformity categorizing the non-attainment area as a "smoke reduction zone".

Through successful implementation of the developed program strategies, the Tacoma-Pierce County non-attainment area achieved PM_{2.5} monitoring levels lower than the NAAQS and has continued demonstration of attainment since 2009. In 2012, the EPA made a "clean data determination" for the attainment area. This determination suspends certain planning requirements for the state set in Clean Air Act Subpart D, so long as the region continues to meet the NAAQS.

In October 2014, Ecology requested that EPA reconsider the Tacoma-Pierce County PM_{2.5} attainment status and submitted revisions of the State Implementation Plan (SIP) –which provides a blueprint of how maintenance and non-attainment areas will meet or maintain the NAAQS– to incorporate a 10-year attainment maintenance plan. EPA has 18 months to approve the revised plan.

Many factors contribute to the fate and transport of pollutants therefore it is possible for communities surrounding a non-attainment area to impact non-attainment status. For these reasons, local air quality authorities need to work with the surrounding communities who may potentially impact the non-attainment area and likewise reduce their PM_{2.5} emissions. The degree to which surrounding communities or businesses must reduce their emissions depend on their level of contribution, the type of pollutant, sources of the pollutant, and other factors specific to that region. Equal consideration should be implemented for all pollutant emissions related to Sumner's maintenance area designations.

Air Toxics Issues

The study area includes residential, commercial, and industrial uses that pose no special issues related to air toxics. Within the study area, there are no major industrial facilities that emit large amounts of toxic air pollutants. Within the airshed of Sumner (Pierce County) there are numerous large business and industrial facilities that contribute regional air quality. These major industrial emitters are regulated by the PSCAA and must control their emissions according to permitted levels. Heavy diesel trucks traveling along major roadways have the potential to emit toxic air pollutants. It is expected that existing and future air quality in the study area adjacent to major roadways could be affected by minor to moderate concentrations of toxic air pollutants.

According to the EPA's National Air Toxics Assessment 2005 database, the existing respiratory cancer risk in the census tracts that include the City of Sumner is roughly 45×10^{-6} (EPA website 2014b). In other words, the added cancer risk is 45 cases out of one million people. This is typical of developed suburban areas in Washington State.

² An airshed is "a geographical area within which the air frequently is confined or channeled, with all parts of the area thus being subject to similar conditions of air pollution" (February 19, 2015, <http://dictionary.reference.com/browse/airshed>)

Puget Sound Regional Council Transportation Conformity Analysis

Under federal and state regulations, the Puget Sound Regional Council (PSRC) is required to demonstrate that the Regional Transportation Improvement Program (TIP) is consistent with the air quality goals identified in the State Implementation Program (SIP). The SIP established emission budgets for three air pollutants (CO, PM_{2.5}, and NOx) for which the PSRC's conformity analysis must demonstrate that the total regional emission produced by TIP projects, plus activity on the existing travel network, do not exceed. The most recent air quality analysis (PSRC website 2014) for the 2015 – 2018 Regional Transportation Improvement Program calculated emissions for these three pollutants based on the long-range Regional Transportation Plan (2040 forecast regional emissions), land use modeling, travel demand modeling, and Motor Vehicle Emission Simulator (MOVES2014). The analyses provided positive air quality findings. This allows the region to proceed with implementation of transportation projects in a timely manner.

Transportation Conformity Regulations

Within the region, all federal or state funded, significant transportation projects (including constructing or widening roadways and signalized intersections) that are proposed within non-attainment or maintenance areas are subject to the Transportation Conformity Regulations [Code of Federal Regulations, Title 40 (40 CFR), Parts 51 and 93; Washington Administrative Code (WAC) Chapters 173-420]. These regulations ensure that transportation projects, plans, and programs will conform to existing plans and timetables for attaining or maintaining NAAQS.

For all proposed future roadway improvement projects, the permitting agency must verify transportation conformity by the following steps:

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

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

The Puget Sound Regional Transportation Improvement Program (TIP) lists current transportation projects that meet these qualifications. Currently, there are two TIP projects listed within the Sumner area. It is unclear whether the City of Sumner would request state and federal transportation funding to support future roadway and intersection improvements required for this proposed development but, if the City does use state or federal funds to construct any roadway improvements, then they will be required to include the preceding air quality demonstrations in Washington State Environmental Policy Act (SEPA) and/or National Environmental Policy Act (NEPA) documentation.

Puget Sound Clean Air Agency Regulations

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

All industrial and commercial air pollutant sources in the Puget Sound region are required to register with PSCAA. Facilities with substantial emissions are required to obtain a Notice of Construction air quality permit before construction is allowed to begin. The application for this permit requires the facility to:

- Install Best Available Control Technology (BACT) to reduce emissions
- Conduct computer modeling to demonstrate that the facility's emissions will not cause ambient pollutant concentrations to exceed the NAAQS limits

- Minimize the impacts of odors and toxic air pollutants

Outdoor Burning

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

Indoor Burning

In 2011, PSCAA organized the Tacoma-Pierce County Clean Air Task Force to develop and implement strategies to reduce PM_{2.5} pollution. The majority of the reduction measures focused on decreasing residential wood smoke, by:

- Establishment of a lower action level to trigger air quality burn bans with enhanced enforcement.
- Incentivized change-out of old non-certified stoves.
- Public outreach programs and policies that allow recipients of burn ban Notice of Violations to mitigate penalties by replacing their existing non-certified wood stoves, to sign up for burn ban email/text alerts, or to pass a clean burn test.
- Within the PM_{2.5} non-attainment zone, all non-certified wood stoves (new or existing) will be banned (after September 30, 2015). Subsidies are available to residents within this smoke reduction zone including a buy-back and recycle program, replacement discounts, and free heating replacement to low-income households.

Although the majority of Sumner lies outside the boundaries of the Tacoma-Pierce County non-attainment area, the City (and its residents) are still held to regional and statewide regulations on residential wood smoke control measures –set by the PSCAA and in Washington Administrative Code– these regulations include emission performance standards, opacity standards, prohibition of certain fuel types, criteria for impaired air quality burn bans, and restrictions on operation of solid fuel burning devices (certified and non-certified wood stoves) (PSCAA Regulation I – Article 13; WAC 173 - 433).

All new wood burning devices offered for sale, resale, or given away to residents of Washington State must meet the state emission standards even if the device is exempt from the EPA certification. Exhibit 3-9 shows of the Washington State fine particle mission standards for wood burning devices in comparison to the federal EPA limits. These standards –enforceable by the PSCAA and Ecology– apply to wood and pellet stoves, wood furnaces, manufactured fireplaces, and masonry heaters. Additional requirements apply to the material and condition of the material burned in these devices. One example is that the moisture content of firewood may be no more than 20 percent.

Exhibit 3-9. Emission Standards for Wood Burning Devices

Type of Device	Washington Limit	EPA Limit
Catalytic wood burning devices	2.5 g/hr	4.1 g/hr
Non-catalytic wood burning devices	4.5 g/hr	7.5 g/hr
Factory-built fireplaces and masonry heaters	7.3 g/hr	currently no limit

g/hr = grams per hour

Source: Ecology website, 2014.

Greenhouse Gas Emissions

Global Climate Change

Extensive international scientific research on human-induced accumulation of greenhouse gas (GHG) emissions affecting global climate change has now spanned several decades. There is a broad consensus amongst the worldwide scientific community that anthropogenic emissions have measurably impacted global temperatures and will continue to deleteriously impact the climate. As a result, the Kyoto

Protocol is one of the first examples of recognition of global warming and international cooperation to globally mitigate human GHG emissions.

Climate change is a global problem influenced by an array of interrelated factors that have concrete consequences for the Pacific Northwest. A 2009 report by the University of Washington's Climate Impacts Group found that climate change will significantly challenge the region's natural and built systems (Climate Impacts Group website, 2009). Changes in temperature and climate are expected to have a dramatic impact on plants and animals currently adapted to conditions that will no longer prevail.

The vast majority of worldwide emissions are beyond the City of Sumner's scope of control. In general, no single municipality emits enough GHGs to influence global climate change by itself but cumulatively contributes to global warming by GHG emissions. Therefore, implementing reductions in GHG emissions demonstrates leadership by the citizens of the City and follows the path that other state and local governments throughout the United States are already taking to reduce future potential GHG emissions and to adapt to future global warming impacts.

National Environmental Policy Act (NEPA) Requirement for Climate Change Analysis

On December 7, 2009, the EPA signed the Endangerment and Cause or Contribute findings for GHGs under Section 202(a) of the Clean Air Act. Under the Endangerment Finding, the EPA determined that the current and projected concentrations of the six key well-mixed GHGs (CO₂, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) in the atmosphere threaten the public health and welfare of current and future generations. Under the Cause or Contribute Finding, the EPA determined that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG emissions that threaten public health and welfare. These findings did not set requirements on industry or other entities but through collaboration with the National Highway Traffic Safety Administration, the EPA finalized emission standards in May 2010 for light-duty vehicles (2012 to 2016 model years) and August 2011 for heavy-duty vehicles (2014 to 2018 model years) (EPA website, 2013).

On February 19, 2010, the Council on Environmental Quality issued a draft NEPA guidance document on the consideration of the effects of climate change and GHG emissions. This guidance document advises federal agencies to consider opportunities to reduce GHG emissions caused by federal actions, adapt their actions to climate change impacts throughout the NEPA process, and address these issues in their agency NEPA procedures. Where applicable, the scope of the NEPA analysis should cover the GHG emission effects of a proposed action and alternatives, and the relationship of climate change effects to a proposed action or alternatives. However, this guidance document does not set numerical thresholds for what levels of GHG emissions would constitute a significant impact, nor does it specify what types of mitigation measures should be required by local municipalities. This guidance document also advises that when determining the effects of climate change on a proposed action, an agency should start with an identification of the future condition of the affected environment for the "no action" alternative, which should serve as the basis for evaluating and comparing the incremental effects of other action alternatives. However, this method has no standing for SEPA reviews.

State of Washington Greenhouse Gas Requirements

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

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

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

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

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

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

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

Ecology issued revised GHG guidance in June 2011 for SEPA reviews regarding actions where Ecology is the SEPA lead agency (Ecology website, 2011). This guidance is applicable only to projects where Ecology is the lead agency or agency with jurisdiction. Ecology’s 2011 guidance for Ecology-led SEPA determinations sets a SEPA significance threshold of 25,000 metric tons per year of GHG emission or a mitigation plan that anticipates 11 percent reduction on that emission increase. The 2011 Ecology guidelines do not specify significance thresholds or mitigation requirements for local governmental actions for which the municipality is the SEPA lead agency. Regardless, Ecology’s recommendation of an 11 percent reduction illustrates the importance of local actions to reduce GHG emissions and is therefore adopted in this EIS as a relevant reference for a significance threshold on GHG emission increases.

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

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

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

Since 2007, Ecology has released a state-wide GHG emissions inventory comparing data from 1990, 2000, and 2005 through 2010 and demonstrated that transportation has been consistently the most significant GHG emission contributor. Between 2008 and 2010, the transportation sector contributed a level of GHG approximately equal to the combined emissions of residential/commercial/industrial and electricity sources within the state. One significant sector trend showed a decrease in GHG emissions from generation of electricity, which was attributable to an increase in wind and hydroelectric power generation between 2005 and 2010 (Ecology website, 2010).

Puget Sound Clean Air Agency and Greenhouse Gases

In 2004, PSCAA published its strategy document for climate change, entitled *Roadmap for Climate Protection: Reducing Greenhouse Gas Emissions in Puget Sound* (PSCAA 2004). In this strategy

document, the Puget Sound Clean Air Agency Climate Protection Advisory Committee (CPAC) advocates local action for reducing traffic and sprawl, stabilizing and reducing energy costs, protecting land, air, and water resources, and increasing the competitiveness of businesses and industries. They state, *“Puget Sound can do more than reduce its own emission. We are one of the best-qualified communities anywhere to pioneer solutions with both local benefits and global applications”* (PSCAA 2004).

In addition to a call for action, CPAC provided eight priority recommendations, which they believe would reduce regional GHG emission back to Puget Sound’s 1990 emission levels while boosting regional economy by \$1.4 – \$2 billion by 2020. The recommendations include:

- Maximize energy efficiency and increase renewable energy in the region’s power mix
- Reduce the greenhouse gas emissions of new vehicles sold
- Reduce motor vehicle miles traveled
- Protect natural landscapes and forest biomass
- Increase recycling and composting rates, reduce waste
- Develop and adopt a climate change policy framework
- Promote public education and citizen/corporate/government action
- Encourage local governments to act on behalf of global warming

Although this document did not propose a SEPA significance threshold for GHG emissions, nor did it require local governments to impose future mitigation measures for future development projects, it illustrates the importance of local government actions to reduce GHG emissions.

Climate Change in the Sumner Municipal Code

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

In 2014, the City amended the M-1 (light industrial) zoning regulations applicable to the largest amount of zoned employment acres in the city limits, to provide development incentives that allow greater building heights for new non-residential construction if the owner or operator adopts one or more of the following measures that were estimated to reduce GHG emissions:

- Provide end-of-trip bicycle facilities to employees
- Construct LEED-certified buildings
- Participate in the PSE Green Power Program

Additionally, the City adopted the following lighting standard for all new non-residential construction in the M-1 zone to reduce GHG emissions:

- Use energy-efficient outdoor lighting

Impacts

Impacts Common to All Alternatives

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

Construction Impacts

During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. Air quality regulations require construction contractors to take all reasonable steps to minimize fugitive dust emissions during

construction. These required mitigation measures are designed to reduce localized impacts affecting homes and businesses adjacent to the construction sites. Regardless, construction activity could cause localized fugitive dust impacts at homes and businesses near the construction site.

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

Some construction activities could cause odors detectable to some people in the vicinity of the construction, especially during paving operations using tar and asphalt. Such odors would be short-term and localized.

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

Operational Impacts

REGIONAL AIR QUALITY IMPACTS

Tailpipe emissions for all of the alternatives would be very small relative to the overall regional tailpipe emissions within the Puget Sound air basin. Photochemical smog (the regional haze produced by ozone and fine particles) is caused by regional emissions throughout the Puget Sound, rather than localized emissions from any individual neighborhood. Photochemical smog was a serious concern in the Puget Sound region before the late 1980s, but federal tailpipe emission regulations have reduced vehicular emissions to the point that the region is currently a designated attainment area for ozone.

To track the reduction of regional tailpipe emissions, Ecology's Seattle-Tacoma Puget Sound Area Ozone Maintenance Plan (Ecology, 2003) set allowable emissions budgets for Puget Sound regional transportation emissions, with the understanding that as long as regional emissions are below the allowable budgets then photochemical smog impacts are unlikely to resume. Similarly, the PSRC set regional transportation emission budgets related to PM_{2.5} attainment. Transportation budgets are set for three pollutants: CO, nitrogen oxides, and PM_{2.5}. The corresponding PSRC air quality conformity analyses concluded that there forecast regional emissions for its 2040 planning year will be far below the allowable budgets (PSRC, 2010).

MOBILE SOURCE AIR TOXICS

Future development might require future improvements to existing roadways. When a street is widened and, as a result, moves closer to receptors, the localized level of mobile source air toxics (MSAT) emissions could be higher, but this could be offset by 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) should, over time, cause significant reductions in region-wide MSAT levels in most cases.

LOCALIZED TRANSPORTATION IMPACTS AT CONGESTED INTERSECTIONS

Under any of the alternatives, localized CO impacts could occur at major intersections that experience significant traffic congestion. Measured exceedances of the NAAQS limits for CO are now extremely rare even at the most heavily congested downtown intersections in the state, so it is unlikely any intersections in the study area would experience enough future congestion to cause significant CO impacts.

Furthermore, ongoing EPA motor vehicle regulations have caused 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.

SUMNER COMPREHENSIVE PLAN UPDATE SEIS AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION

REGIONAL EMISSIONS FROM VEHICLE TRAVEL

Tailpipe emissions from vehicles traveling on public streets would be one of the largest sources of air pollutant emissions associated with the growth in the study area. However, ongoing EPA emission control requirements for on-road cars and trucks have dramatically improved per-vehicle tailpipe emission rates. That beneficial trend is expected to continue into the future as drivers gradually replace old vehicles with new, clean-burning vehicles. As a result, the decrease in future per-vehicle emission rates might offset the forecast increase in City-wide VMT. In that case, City-wide emissions from on-road vehicles might be expected to remain roughly the same as existing levels, or even gradually decrease compared to existing levels.

SPACE HEATING EMISSIONS AT RESIDENTIAL AND RETAIL/COMMERCIAL BUILDINGS

Emissions would be generated by natural gas, fuel oil, and propane combustion used for space heating (stationary combustion) at new and existing dwelling and retail/commercial businesses. However, current emissions from residential and commercial space heating are only a minor fraction of the City's overall emission rates. Furthermore, per-building space heating emissions are expected to decrease in response to energy conservation issues and as future residents purchase more fuel-efficient furnaces. Therefore, future space heating emissions are not expected to cause significant air quality impacts.

Space heating with electricity may also generate indirect emissions if the regional electricity source is a fossil-fueled power plant. However, any electricity used in the City would likely be generated by either hydroelectric or thermal power plants (outside the City), and those large thermal power plants are required to install air pollution control devices. Therefore, the increase in electrical consumption is also not expected to cause a significant impact within or near the city limits, nor is it expected to substantially increase region emission from power plants.

RESIDENTIAL WOOD BURNING

As discussed, residential wood-burning appliances elevate concentrations of particulate matter and toxic air pollutants particularly when heavy wood burning is combined with stagnant weather conditions. The ambient air pollutant concentrations caused by residential wood combustion generally occur in the immediate neighborhood. Consequently, residential development containing large numbers of wood-burning appliances would represent a potentially significant air pollutant source.

The PSCAA's existing regulations and policies have been tightened to improve regional air quality related to PM_{2.5}. Washington State requires that all new woodstoves installed in the state are to be certified by more stringent standards than EPA has set, and after September 2015, non-certified wood burning devices (existing or new) will be banned from areas of non-attainment.

The PSCAA now has lower thresholds to trigger the call of stage 1 and 2 air quality burn bans during unusually stagnant weather conditions with monetary penalty to burn ban violators. Programs have been implemented to support community awareness to choose the right wood burning device, properly prepare wood for more clean burning, and be informed of burn ban status through voluntary submission to text/email burn ban notifications. For regions within the non-attainment jurisdiction, subsidies are provided to help residents change-out old non-certified stoves for certified, cleaner burning, more efficient equipment.

Continued enforcement of these regulations and policies ensures that future emissions from residential wood combustion would prevent ambient pollutant concentrations in heavily populated areas from approaching health-based NAAQS limits. As a mitigating measure, the Sumner may consider restricting installation of new woodstoves in certain densely populated regions.

EMISSIONS FROM FUTURE INDUSTRIAL OPERATIONS

Under all of the alternatives, the study area is expected to experience air quality impacts due to commercial/business operations. It is likely that new commercial development would occur near either current or future residential property. Unless properly controlled, stationary equipment (such as gas stations), mechanical equipment (such as commercial boilers and heating units), and trucks at loading docks at retail buildings could cause air pollution issues at adjacent residential properties.

However, large stationary pollutant-emitting industrial equipment must be registered and permitted with PSCAA. Ecology and the EPA require all commercial and industrial facilities to use Best Available Control Technology on stationary equipment to minimize emissions. The agency may require applicants with high emissions to conduct an air quality assessment to demonstrate that the proposed emissions would not expose offsite areas to odors or pollutant concentrations in air exceeding regulatory limits. Therefore, it is unlikely that new commercial operations would cause significant air quality issues.

Impacts Specific to the No Action

This section describes impacts specific to Alternative 1 – No Action.

Greenhouse Gas Significance Threshold

For the purposes of this analysis, the GHG emissions are expressed in terms the differences between the City-wide future no-action condition and future proposed land use conditions. For this EIS, a tiered significance threshold was adopted based on Ecology's 2011 guidance. For any alternative the GHG emissions are presumed to be not significant if the alternative causes a "business as usual" increase of less than 25,000 metric tons per year of CO₂e compared to Alternative 1, No Action. If the alternative causes a "business as usual" emission increase greater than 25,000 metric tons per year, then the GHG emissions are presumed to be not significant if the City implements GHG reduction measures to reduce the "business as usual" increase by at least 11%.

Greenhouse Gas Emission Calculation Methods

This section describes methods used for estimating projected GHG emissions based on the three alternatives.

For this analysis, GHG emissions are expressed as metric tons of CO₂e per year to account for the combined global warming potential caused by the most common GHG constituents (CO₂, methane, and nitrous oxide). For purposes of comparing alternatives and determining significance under SEPA, forecast GHG emission increases are based on comparing the future emission rates for each alternative to the forecast future emission rate of the "No Action Alternative".

The "SEPA GHG Calculation Tool" –available through the Ecology's "Guidance Document Including GHG emission in SEPA Reviews" (Ecology website, 2013)– utilizes accepted protocol for evaluating project specific GHG emissions. In general, the calculation tool uses national average energy consumption data. It was used to evaluate existing and projected future (2035) GHG emissions for each action alternative. This analysis provides a screening-level estimate of life-cycle "business as usual" emissions for residential, institutional, commercial, and industrial land uses, not including individual large stationary industrial sources or any special project-level emissions reduction measures or other mitigation measures.

The available input data used for the GHG emission calculations were limited to aggregate square footages for commercial, institutional, and industrial land development, and aggregate housing units for single- and multi-family housing. Given those input limitations, this method of analysis is considered an adequate screening-level tool for the purpose of forecasting GHG emission rates.

Three types of life-cycle emissions were estimated using the SEPA GHG Calculation Tool: energy, transportation, and added "soil carbon" emissions caused by removing vegetation.

- Energy emissions are generated by stationary combustion (i.e. furnace combustion of natural gas for space heating) and electricity consumption throughout the lifespan of a building. These emissions estimates are based on the U.S. Energy Information Administration's residential and commercial energy consumption surveys.

- Transportation emissions include tailpipe emissions generated by on-road vehicles used by particular building occupants. This evaluation not only accounts for transportation emissions for the employees working at commercial and industrial land use categories, but also for delivery trucks carrying goods to or from the buildings and vehicle travel by customers at commercial or industrial areas. For example, a building related to commercial grocery stores or malls would have much more customer related vehicle travel than a dentist's office.

For future projections of 2035 transportation emissions, the default value for the average fuel economy in the calculations listed above was increased to 54.5 miles per gallon (mpg) to reflect the EPA's newly proposed Corporate Automobile Fuel Economy vehicle mileage standard for 2025. For the analysis of existing conditions, the spreadsheet's default fuel economy of 20.8 mpg for average passenger vehicles (based on Bureau of Transportation Statistics' national data) was used.

For the purpose of calculating GHG emissions for this screening-level programmatic analysis, all of the forecast commercial space was aggregated into the land use categories: residential, institutional, retail, office space, and industrial. The transportation emissions do not account for vehicles passing through the study area, unless they are directly associated with the buildings being evaluated.

"Soil Carbon" Greenhouse Gas Emissions from Permanent Removal or Restoration of Biomass

All alternatives would add impervious surface and result in removal of biomass (i.e., grass, shrubs, trees, etc.). Therefore, total biomass within the study area would be reduced for the alternatives. The general term "soil carbon GHG emissions" refers to the effect of permanently removing existing vegetation for the purpose of constructing new development. This exacerbates global climate change by two mechanisms. First, the existing biomass consisting of aboveground vegetation and underground root mass is immediately removed and disposed of, which immediately causes the biomass to decay and release carbon dioxide to the atmosphere. Second, the aboveground vegetation that was permanently removed is no longer available to remove CO₂ from the atmosphere during natural photosynthesis. Likewise, the restoration and replanting of vegetation in areas that have already been cleared of vegetation is a way to recapture carbon by locking the carbon into the plant structure and releasing oxygen into the atmosphere.

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

Land Use Values for Greenhouse Gas Calculations

For the purposes of this analysis, the GHG emissions are expressed in terms of their increase above existing conditions and their increase between the future no-action alternative and future proposed land use conditions in the study area. Exhibit 3-10 lists these projected study area land uses values for calculating GHG emissions for each alternative. The values listed under "existing" represent current land use. The values listed for each alternative represent the net increase compared to existing conditions.

**Exhibit 3-10. Net Increase in Land Use and Population Growth for
Greenhouse Gas Emission Calculations**

Land Use Category	Unit	Existing	Net Increase Above Existing ^a		
			Alt. 1	Alt. 2	Alt. 3
Residential					
Single Family	#DU	3,002	2,008	2,008	2,008
Multi-Family	#DU	1,533	750	916	945
High Rise Condo	#DU	0	0	0	0
Institutional					
Grade School	1,000 SF	52	0	0	0
High School	1,000 SF	241.8	0	0	0

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Land Use Category	Unit	Existing	Net Increase Above Existing ^a		
			Alt. 1	Alt. 2	Alt. 3
College	1,000 SF	0	0	0	0
Industrial					
Light Industrial	1,000 SF	1.0	1,644.63	1,644.63	1,739.75
Manufacturing ^b	1,000 SF	830.4	1,644.63	1,644.63	1,739.75
Warehousing	1,000 SF	10,204.9	6,515	6,515	6,515
Retail					
General Retail	1,000 SF	929.3	546.445	546.445	757.608
Supermarket	1,000 SF	171.1	100.610	100.610	139.489
Bank	1,000 SF	20.7	12.172	12.172	16.876
Restaurant	1,000 SF	19.3	11.349	11.349	15.734
Fast-Food Restaurant	1,000 SF	4.5	2.646	2.646	3.669
Gas Station	1,000 SF	17.6	10.349	10.349	14.348
Auto Repair	1,000 SF	94.2	55.391	55.391	76.796
Office Space					
Non-Medical	1,000 SF	418.5	345	345	317
Medical	1,000 SF	91.3	0	0	0
Hotel	1,000 SF	76.7	0	0	0
Disturbed Area (Soil Carbon)	Acres	--	2089.7	2105.1	2114.1

^a Values are approximated

^b Not including stack emissions from process equipment

DU = dwelling unit; SF = square feet

Source: BERK Consulting, 2014; BERK Consulting, 2015.

Citywide

Action Alternatives 1 (No Action) and 2 (Minimal Zoning Action) have similar projected land use values with the industrial, retail, and office space growth areas. The increase, compared to No Action, for Alternative 2 is focused mainly on the multi-family unit development. Alternative 3 (Assertive Collaborative Action) is expected to change only slightly in residential, industrial, and office space but more growth within the retail sector due to the greater available developable land in East Sumner in this alternative.

East Sumner

Considering that the planned action is focused in the East Sumner area, the housing and employment growth should be similarly centralized to the eastside but dependent on the chosen alternative action. However, air quality impacts are regional; comparing both City-wide emissions and East Sumner emissions between each action alternative can be confounding. Therefore, this analysis considers future land use growth and future emission increases on a City-wide basis only. The expected impact for the East Sumner area may be qualitatively inferred based on the proportions of projected growth for East Sumner as displayed in

Exhibit 3-11.

**Exhibit 3-11. East Sumner Portion of Future Land Use Growth Estimates
Based on Each Action Alternative**

Anticipated Growth		Alt. 1	Alt. 2	Alt. 3
Housing Growth (DU)	City-wide	2,758	2,924	2,953
	East Sumner Area	246	355	500
	East Sumner's Contribution in Growth	8.9%	12.1%	16.9%

Anticipated Growth		Alt. 1	Alt. 2	Alt. 3
Employment Growth (Jobs)	City-wide	12,593	12,593	12,946
	East Sumner Area	418	418	581
East Sumner's Contribution in Growth		3.3%	3.3%	4.5%

^a Values are approximated

DU = dwelling unit

Source: BERK Consulting, 2014.

Calculated Greenhouse Gas Emissions

Exhibit 3-10 lists the projected study area land use inputs for estimating GHG emissions from each action alternative. Exhibit 3-12 lists the corresponding estimates for existing population area source emissions along with each action alternative's emission increase above that existing level. Stationary combustion and electricity represents energy consumption related to heat and power at future establishments. Transportation emissions represent the tail-pipe emissions related to operational transportation associated with new establishments. Soil carbon emissions represent the influence from vegetative loss during development of impervious surface structures.

Exhibit 3-12. Comparison of Predicted Annual Greenhouse Gas Emissions within the Study Area

GHG Emissions Estimates	Projected Average Annual GHG Emissions (metric tons CO ₂ e per year)		
	Alternative 1 No Action	Alternative 2 Min. Zoning	Alternative 3 Assertive Collaborative
Existing Emissions	1,091,789		
Forecast Emissions			
Increase Above Existing (Stationary Combustion)	21,214	21,830	22,476
Increase Above Existing (Electricity)	41,873	42,383	44,539
Increase Above Existing (Transportation)	675,208	675,934	690,048
Increase Above Existing (Soil Carbon)	92,939.3	93,624.2	94,024.9
Total Increase Above Existing	831,234	833,771	851,088
Increase Above No Action	--	2,537	19,853

CO₂e = greenhouse gas, carbon dioxide equivalents

Source: Landau Associates, 2015.

Alternative 1 (No Action) would maintain the current development plan and regulations within the City of Sumner. As shown in Exhibit 3-10, housing growth associated with Alternative 1 would be the least of all the studied alternatives. Commercial and minor industrial growth is equivalent to Alternative 2 and less than Alternative 3. As shown in Exhibit 3-13, localized GHG emissions resulting from Alternative 1 would be the least of all the alternatives.

Regional VMT Contributing to Regional Tailpipe Emissions

Daily VMT can be used as an indicator of regional on-road vehicle air pollutant emissions. Exhibit 3-13 shows the airshed contribution of the City of Sumner's 2035 VMT emissions to the 2040 Puget Sound regional forecast of daily VMT. As shown in Exhibit 3-13, Alternative 1 would result in approximately 105,069 VMT per day, which is only 0.12% of the total VMT within the airshed. This is inconsequential small compared to the Puget Sound regional VMT, therefore, the impact associated with tailpipe emissions and photochemical smog under growth by Alternative 1 would be minor compared to the total regional tailpipe emissions.

Exhibit 3-13. Contributions to Forecast Regional Vehicle Miles Traveled

	Alt 1	Alt 2	Alt 3
Forecast Daily VMT	No Action	Historic	MJR
2035 City of Sumner ^a	105,069	110,135	110,465
Puget Sound 2040 daily VMT ^b	85,280,704	85,280,704	85,280,704
Forecast Total Regional VMT	85,385,773	85,390,839	85,391,169
Sumner Contribution to Regional Tailpipe Emissions	0.12%	0.13%	0.13%

Sources: ^aTranspo, 2015; ^bPSRC, 2010.

Impacts Specific to the Minimal Zoning Action

Calculated Greenhouse Gas Emissions

As shown in Exhibit 3-10, housing growth associated with Alternative 2 would be slightly more than Alternative 1 (No Action) and slightly less than Alternative 3. Commercial and minor industrial growth is equivalent to Alternative 1 but less than Alternative 3. As shown in Exhibit 3-12, localized GHG emissions resulting from Alternative 2 would be only slightly more than Alternative 1 but an order of magnitude less than the action Alternative 3. This slight increase above No Action is less than what is considered significant (less than 25,000 metric tons CO₂e). Therefore, implementation of Alternative 2 should not require mitigation measures beyond those required to comply with existing air quality regulations.

Regional VMT Contributing to Regional Tailpipe Emissions

As shown in Exhibit 3-15, Alternative 2 would result in approximately 110,135 VMT per day, which is only 0.13% of the total VMT in the region. Therefore, the impacts of tailpipe emissions and photochemical smog to the airshed associated with Sumner VMT under Alternative 2 would be minor compared to the overall impacts associated with total regional VMT.

Impacts Specific to the Assertive Collaborative Action

Calculated Greenhouse Gas Emissions

As shown in Exhibit 3-10, housing, commercial, and minor industrial growth associated with Alternative 3 would be greater than both Alternatives 1 and 2. Likewise, as shown in Exhibit 3-12, actions under Alternative 3 are forecast to cause a “business as usual” emission increase of 19,853 metric tons CO₂e per year compared to No Action, Alternative 1. Although this estimated increase is higher than from Alternative 2, the forecast annual GHG emission rate increase does not exceed the significance threshold of 25,000 metric tons CO₂e per year. In accordance with the GHG significance threshold applied for this SEIS, the City of Sumner is not required to mitigate the GHG emissions (beyond those required to comply with existing air quality regulations) because the impacts are not significant. If desired by the City, a variety of supplemental voluntary measures to reduce GHG emissions could be implemented, therefore a number of potential GHG emission reduction measures, along with their estimated range of effectiveness, are presented in the section “Greenhouse Gas Reduction Measures”.

Regional VMT Contributing to Regional Tailpipe Emissions

As shown in Exhibit 3-13, Alternative 3 would result in approximately 110,465 VMT per day, which is only 0.13% of the total VMT in the region. Therefore, the impacts of tailpipe emissions and photochemical smog to the airshed associated with Sumner VMT under Alternative 3 would be minor compared to the overall impacts associated with total regional VMT.

Mitigation Measures

The forecast GHG emission increase compared to “business as usual” operation under action by any of the three alternatives evaluated in this EIS, are not considered significant in accordance with the threshold adopted for this EIS. Therefore, mitigation action to reduce GHG emission is not required. Regardless, this section presents a variety of GHG reduction measures the City could incentivize on a supplemental, voluntary basis.

Incorporated Plan Features

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

- Commuter Rail/Regional Transit Sub-Element
 - 1. Support regional transit connections in the Sumner Planning Area.
 - 1.6 Promote the use of the Sounder commuter train by the entire Sumner community. Provide housing near the train station for households desiring the close transit availability, and provide services and businesses that cater to residents and train commuters.
 - 1.9 Request that Sound Transit provide additional bicycle lockers at the station to encourage bicycle commuting to the station.
 - 1.10 Work with transit agencies to improve the frequency and location of transit service between high-density residential areas and the MIC, provide connections between the rail stations and the MIC, and encourage transit ridership through efforts such as prioritizing pedestrian improvements near transit stops and outreach efforts to industrial employers.
- Economic Development Element
 - 1.8 Encourage energy conservation and efficiency in building material and site design.
 - 2.6 In conjunction with transit providers, encourage an adequate transit system to serve the employment centers to allow connections to the transit centers within and outside the City and ensure transit access for those coming to work in the City.
- Community Character Element
 - 2.3 Together with Pierce Transit and other agencies, establish a network of transit stops and a transit system in the neighborhoods and districts, consistent with the Community Linkages Map, connecting to the commuter rail stations and neighborhoods.
- Environment Element
 - 1.1 Protect air quality from adverse impacts.
 - 1.1.1 In order to reduce reliance on the automobile as the primary method of transportation, encourage alternative modes of transportation.
 - 1.1.2 Require air-quality impact analysis for major new developments that could adversely impact the air quality levels in the vicinity.
 - 1.1.5 Encourage the use of alternative fuels.
- Transportation Element
 - 2. The City of Sumner will provide a transportation system that is compatible with State and regional plans, plans of adjacent jurisdictions, and with public transit providers.
 - 2.4 Continue to work with Pierce Transit and Sound Transit to support and enhance a multimodal transportation system by ensuring that the City's transportation plans and facilities are consistent with public transit plans and programs.
 - 3.6 Provide a highly interconnected network of streets, sidewalks, bicycle lanes, and trails for ease and variety of travel.
 - 4. Promote use of alternative transportation modes by providing an interconnected system of pedestrian and bicycle facilities.

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

Additionally, action alternatives would include new environmental element policies regarding climate change and sustainability.

Applicable Regulations and Commitments

- **National Ambient Air Quality Standards:** As described above in National Ambient Air Quality Standards, the EPA establishes NAAQS and specifies future dates for states to develop and implement plans to achieve these standards.
- **State Ambient Air Quality Standards:** Ecology establishes state ambient air quality standards for the same six pollutants that are at least as stringent as the national standards; in the case of SO₂, state standards are more stringent. Table 3.5-1 lists the state ambient air quality standards for six criteria pollutants.

- **Indoor Burning Smoke Reduction Zone:** PSCAA and Ecology's regulatory framework for wood smoke includes:
 - More stringent emission standards for new wood burning devices than the federal EPA standards
 - Opacity standards for wood-burning appliances
 - Prohibitions on burning of certain materials or non-certified wood stoves
 - Burn ban curtailment program
 - Special attainment area provisions
- **Outdoor Burning:** Burning yard waste and land-clearing debris is not allowed at any time in the City or in Pierce County. PSCAA enforces state outdoor burning regulations required by RCW 70.94.743.
- **Puget Sound Clean Air Agency Regulations:** All construction sites in the Puget Sound region are required to implement rigorous emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15: Fugitive Dust Control Measures. All industrial and commercial air pollutant sources in the Puget Sound region are required to register with PSCAA. Facilities with substantial emissions are required to obtain a Notice of Construction air quality permit before construction is allowed to begin.
- **State of Washington GHG Laws:** As described above in State of Washington Greenhouse Gas Requirements, Washington enacted a new law establishing GHG reduction limits.
- **City of Sumner Ordinance 1587:** This ordinance requires affected employers (e.g., employers with 100 employees or more at a single worksite) to implement a Commute Trip Reduction program for its employees.

Other Potential Mitigation Measures

Construction Emission Control

- The City should require all construction contractors to implement air quality control plans for construction activities in the study area. The air quality control plans should include Best Management Practices to control fugitive dust and odors emitted by diesel construction equipment.
- During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. The following Best Management Practices would be used to control fugitive dust:
 - Use water sprays or other non-toxic dust control methods on unpaved roadways.
 - Minimize vehicle speed while traveling on unpaved surfaces.
 - Prevent track-out of mud onto public streets.
 - Cover soil piles when practical.
 - Minimize work during periods of high winds when practical.
- Mobile construction equipment and portable stationary engines would emit air pollutants including NO_x, CO, and diesel particulate matter. These emissions would be temporary and localized. It is highly unlikely that the temporary emissions would cause ambient pollutant concentrations at adjoining parcels to approach the federal limits. Typical mitigation measures to minimize air quality and odor issues caused by tailpipe emissions include the following:

- Maintain the engines of construction equipment according to manufacturers' specifications.
- Minimize idling of equipment while the equipment is not in use.
- Burning of slash or demolition debris would not be permitted without express approval from the PSCAA. No slash burning is anticipated for any construction projects in the study area.

Greenhouse Gas Reduction Measures

The City could expand the zones to which incentives and standards are applied to reduce GHG emissions beyond the M-1 zone; the commercial and heavy industrial zones could be included. For example, the City could allow greater building heights or relaxed parking standards for new non-residential construction if the owner or operator adopts one or more of the following mitigation measures:

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

Additionally, the City could require the following mitigation measure for all new non-residential construction in all commercial and industrial zones and not just the M-1 zone:

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

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

As noted above, mitigation measures proposed for the action alternatives and development goals and policies within the City's Comprehensive Plan will help to mitigate GHG impacts within the study area. However, the City could also require or encourage future developers to implement additional mitigation, as presented in Exhibit 3-14. The measures presented in Exhibit 3-14 could reduce GHG emissions caused by transportation, facilities, building construction, space heating, and electricity usage (Ecology 2008). The table lists potential GHG reduction measures and indicates where the emission reductions might occur.

Exhibit 3-14. Potential Greenhouse Gas Reduction Mitigation Measures

Reduction Measures	Comments
Site Design	
Retain and enhance vegetated open spaces.	Retains or increases sequestration by plants.
Plant trees and vegetation near structures to shade buildings.	Reduces onsite fuel combustion emissions and purchased electricity, and enhances carbon sinks.
Minimize building footprint.	Reduces onsite fuel combustion emissions and purchased electricity consumption, materials used, maintenance, land disturbance, and direct construction emissions.

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Reduction Measures	Comments
Design water efficient landscaping.	Minimizes water consumption, purchased energy, and upstream emissions from water management.
Minimize energy use through building orientation.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Building Design and Operations	
Apply LEED standards (or equivalent) for design and operations.	Reduces onsite fuel combustion emissions and offsite/indirect purchased electricity, water use, waste disposal.
Purchase Energy Star equipment and appliances for public agency use.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Incorporate onsite renewable energy production, including installation of photovoltaic cells or other solar options.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Design street lights to use energy-efficient bulbs and fixtures.	Reduces purchased electricity.
Construct “green roofs” and use high-albedo roofing materials.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Install high-efficiency HVAC systems.	Minimizes fuel combustion and purchased electricity consumption.
Eliminate or reduce use of refrigerants in HVAC systems.	Reduces fugitive emissions. Compare refrigerant usage before/after to determine GHG reduction.
Maximize interior day lighting through floor plates, increased building perimeter and use of skylights, clerestories, and light wells.	Increases natural/day lighting initiatives and reduces purchased electrical energy consumption.
Incorporate energy efficiency technology such as super insulation motion sensors for lighting and climate-control-efficient, directed exterior lighting.	Reduces fuel combustion and purchased electricity consumption.
Use water-conserving fixtures that surpass building code requirements.	Reduces water consumption.
Reuse gray water and/or collect and reuse rainwater.	Reduces water consumption with its indirect upstream electricity requirements.
Use recycled building materials and products.	Reduces extraction of purchased materials, possibly reduces transportation of materials, encourages recycling and reduction of solid waste disposal.
Use building materials that are extracted and/or manufactured within the region.	Reduces transportation of purchased materials.
Use rapidly renewable building materials.	Reduces emissions from extraction of purchased materials.
Conduct third-party building commissioning to ensure energy performance.	Reduces fuel combustion and purchased electricity consumption.
Track energy performance of building and develop strategy to maintain efficiency.	Reduces fuel combustion and purchased electricity consumption.
Transportation	
Size parking capacity to not exceed local parking requirements and, where possible, seek reductions in parking supply through special permits or waivers.	Reduced parking discourages auto-dependent travel, encouraging alternative modes such as transit, walking, and biking. Reduces direct and indirect VMT.

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Reduction Measures	Comments
Develop and implement a marketing/information program that includes posting and distribution of ridesharing/transit information.	Reduces direct and indirect VMT.
Subsidize transit passes. Reduce employee trips during peak periods through alternative work schedules, telecommuting, and/or flex time. Provide a guaranteed-ride-home program.	Reduces employee VMT.
Provide bicycle storage and showers/changing rooms.	Reduces employee VMT.
Use traffic signalization and coordination to improve traffic flow and support pedestrian and bicycle safety.	Reduces transportation emissions and VMT.
Apply advanced technology systems and management strategies to improve operational efficiency of local streets.	Reduces emissions from transportation by minimizing idling and maximizing transportation routes/systems for fuel efficiency.
Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Reduces idling fuel emissions and direct and indirect VMT.
LEED = Leadership in Energy and Environmental Design; HVAC = heating, ventilation, and air-conditioning	

Source: Ecology, 2008.

In addition to the representative GHG reduction mitigation measures listed in Exhibit 3-14, additional GHG reduction measures have been published by the California Air Pollution Control Officers Association (CAPCOA) for purposes of assisting municipalities to develop land-use related GHG reduction measures. Trip reduction measures and GHG emission reduction measures suitable for California will likely also be suitable in Washington. For example, Exhibit 3-15 lists additional emission reduction measures that could be adopted or incentivized (CAPCOA 2010). The table lists CAPCOA's estimated range of effectiveness for reducing VMT or GHG emissions for each measure.

Exhibit 3-15. CAPCOA: Potential Mitigation Measures for Greenhouse Gas Reductions

Measure Number	Title	Description	Range of Effectiveness
Transportation			
TRT-1	Voluntary Commute Trip Reduction	A successful program will include all of the following: carpooling encouragement; ride-matching assistance; preferential carpool parking; flexible work schedules for carpools; half-time transportation coordinator; vanpool assistance; bicycle end-of-trip facilities.	1.0 – 6.2%
TRT-11	Provide Employer-Sponsored Vanpool/Shuttle	A successful program will entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at least program administration, if not more. The driver usually receives personal use of the van, often for a mileage fee.	0.3 – 13.4%
Building Energy			
BE-1	Use Building Insulation Methods That Surpass State Energy Code	Greenhouse gases (GHGs) are emitted as a result of activities in residential and commercial buildings when electricity and natural gas are used as energy sources. New buildings must be designed to meet the building energy efficiency standards of the state energy code, which regulates energy uses including space heating and cooling, hot water heating, and ventilation. By committing to a percent improvement over the state code, a development reduces its energy use and resulting GHG emissions.	0.2 – 5.5% for electricity usage 7-10% for natural gas usage
BE-2	Install Programmable Thermostat Timers	Building management can decrease heating energy use by lowering the wintertime thermostat setting by 10 – 15	BMP – In order to take

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Measure Number	Title	Description	Range of Effectiveness
		degrees for at least eight hours per day (during business/bed time hours). Likewise by increasing the summertime thermostat setting. There is large variability in individual building occupant programming behavior; therefore this mitigation measure is considered a Best Management Practice (BMP) to allow educated occupants to have the most efficient means of controlling their heating/cooling energy use.	quantitative credit, the project applicant would need to provide substantial evidence supporting reduction in energy use.
BE-4	Install Energy Efficient Appliances	To reduce GHG emissions from electricity use: For residential dwellings, typical builder-supplied appliances include refrigerators and dishwashers and, for commercial land use, energy efficient grocery store refrigerators. Energy use of a building is dependent on building type, size and climate zone but typical reductions with ENERGY STAR refrigerators, clothes washers, dishwashers, and ceiling fans use 15%, 25%, 40%, and 50% less electricity than standard appliances, respectively.	2 – 4% (residential) 17 – 22% (grocery stores)
Alternative Energy			
AE-2	Establish Onsite Renewable Energy Systems – Solar Power	Using electricity generated from photovoltaic (PV) systems displaces electricity demand that would ordinarily be supplied by the local utility. Since zero GHG emissions are associated with electricity provided by PV systems, the GHG emissions reductions are equivalent to the emissions that would have been produced had electricity been supplied by a local utility.	Variable
Water Use			
WUW-3	Design Water Efficient Residential & Commercial Landscapes	As an indirect decrease of GHG emissions through reduced energy consumption for pumping, treating, and distributing water, decrease water use by reducing lawn sizes, planting vegetation with minimal water needs, such as Washington native species, and choosing complimentary plants with similar water needs which can provide each other with shade and/or water.	0 – 70%
WUW-4	Use Water-Efficient landscape Irrigation System	“Smart” irrigation control systems use weather, climate, and/or soil moisture data to automatically adjust watering schedules in response to environmental and climate conditions, such as the change in temperature or levels of precipitation. Expected reductions have been as high as 30% with historical high water users.	1 - 6.1%
Vegetation			
V-1	Urban Tree Planting	Planting trees sequesters CO ₂ while the trees are actively growing. The amount of CO ₂ sequestered depends on the type of tree. Typically, the active growing period of a tree is 20 years and after this time the amount of carbon in biomass slows and will be completely offset by losses from clipping, pruning, and occasional death.	Variable by number of trees

Source: California Air Pollution Control Officers Association, 2010.

Significant Unavoidable Adverse Impacts

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

3.6 Land Use

This section addresses the potential impacts associated with changes in existing land uses and land use compatibility. Specifically, it examines the difference between the existing land use and the land uses proposed by the alternatives.

Affected Environment

Current Plan Area

Existing land use statistics were compiled based on the Pierce County Assessor records and aerial photos. Exhibit 3-16 indicates the number of acres by use for the current plan area as a whole and broken down by Sumner city limits and Urban Growth Area (UGA). The predominant land uses in the current plan area are single-family residential (16.5%), vacant (25.2%), civic/public (12.5%), and industrial (21.3%). Exhibit 3-17 depicts existing land use patterns.

Exhibit 3-16. Existing Land Use Statistics – Current Plan Area

Existing Land Use	Acres (City Limits)	Percent (City Limits)	Acres (UGA)	Percent (UGA)	Acres (Total)	Percent (Total)
Agriculture/Mining ⁴	468.5	11.0%	81.8	10%	550.30	10.3%
Commercial/Services ²	350.4	8.3%	26.2	3.13%	376.62	7.0%
Industrial	902.2	21.3%	6.5	1%	908.72	17.0%
Multi-Family Residential ¹	159.5	3.8%	13.6	2%	173.06	3.2%
Parks & Recreation	58.9	1.4%	16.9	2%	75.82	1.4%
Civic/Public ³	531.4	12.5%	176.2	21%	707.64	13.2%
Single Family Residential	702.2	16.5%	345.8	41%	1,048.00	19.6%
Vacant	1,070.1	25.2%	170.2	20%	1,240.34	23.2%
Total Acres (Approx.)	4,243.33	100%	1,112.36	100.00%	5,355.69	100%

Source: City of Sumner 2014.

¹ Includes manufactured home parks and subdivisions.

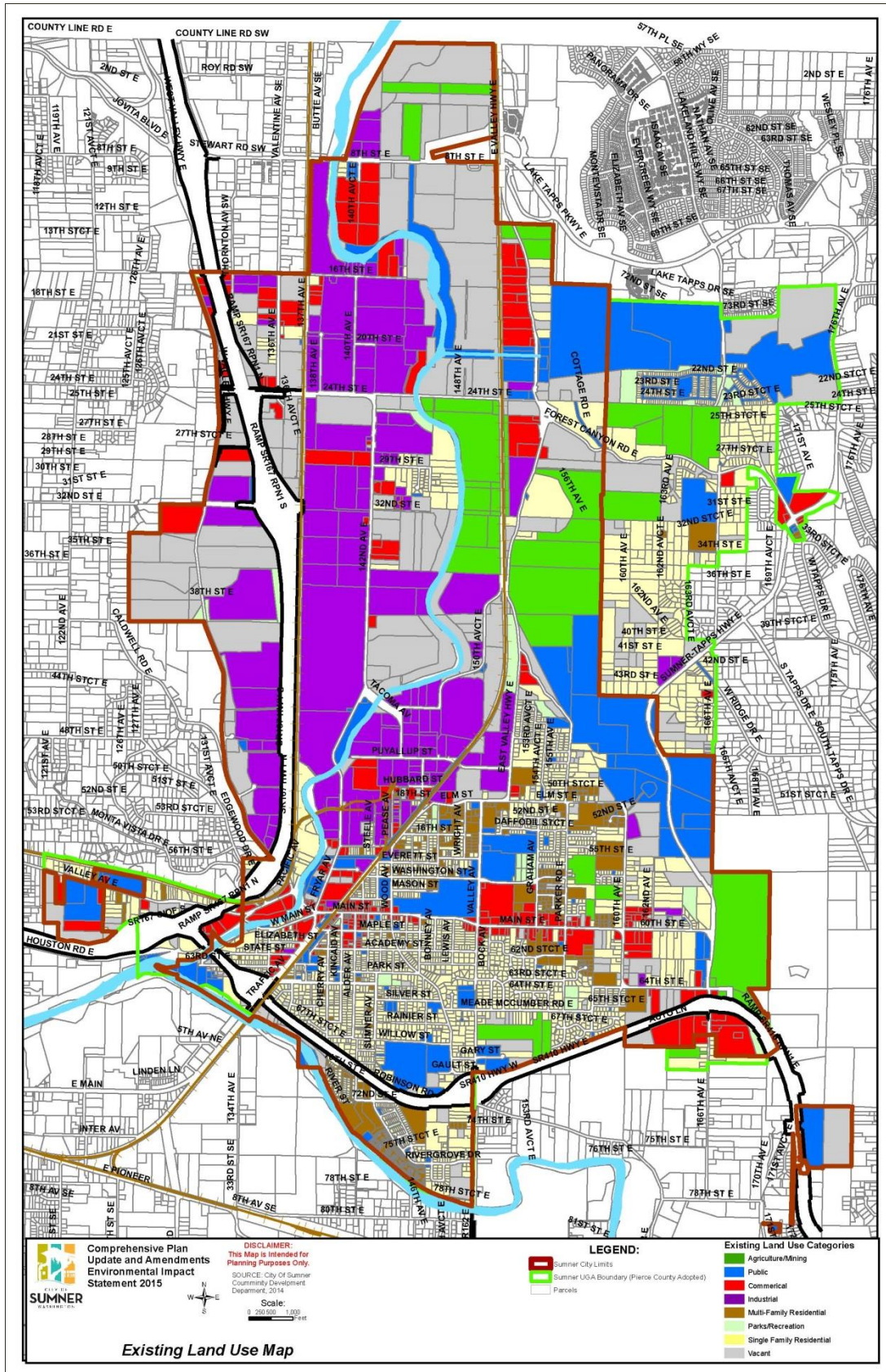
² Includes daycare businesses.

³ Also includes transportation/communication/utilities, churches, and similar uses.

⁴ Also includes forestry operations.

Source: City of Sumner 2014, BERK Consulting 2014

Exhibit 3-17. Existing Land Use Map



Source: City of Sumner 2015

Land Use-Development in the "Pipeline"

Development in the "pipeline" refers to development projects that are proposed, approved, or under construction. Exhibit 3-18 below lists the proposals in the city limits and their current status. The projects include a mix of commercial/non-residential and residential developments with the majority of the projects being commercial/non-residential with 27 projects and 9,682,290 square feet. Eight residential projects consisting of a total of 212 units are in the pipeline. Using a household size of 2.18 (PSRC, 2014, projected for the year 2035) approximately 462 persons could be added to the population within the city limits in the new developments. Non-residential projects will likely increase employment. Exhibit 3-19 shows their location generally in the city limits. There may be other projects in the "pipeline" in the UGA.

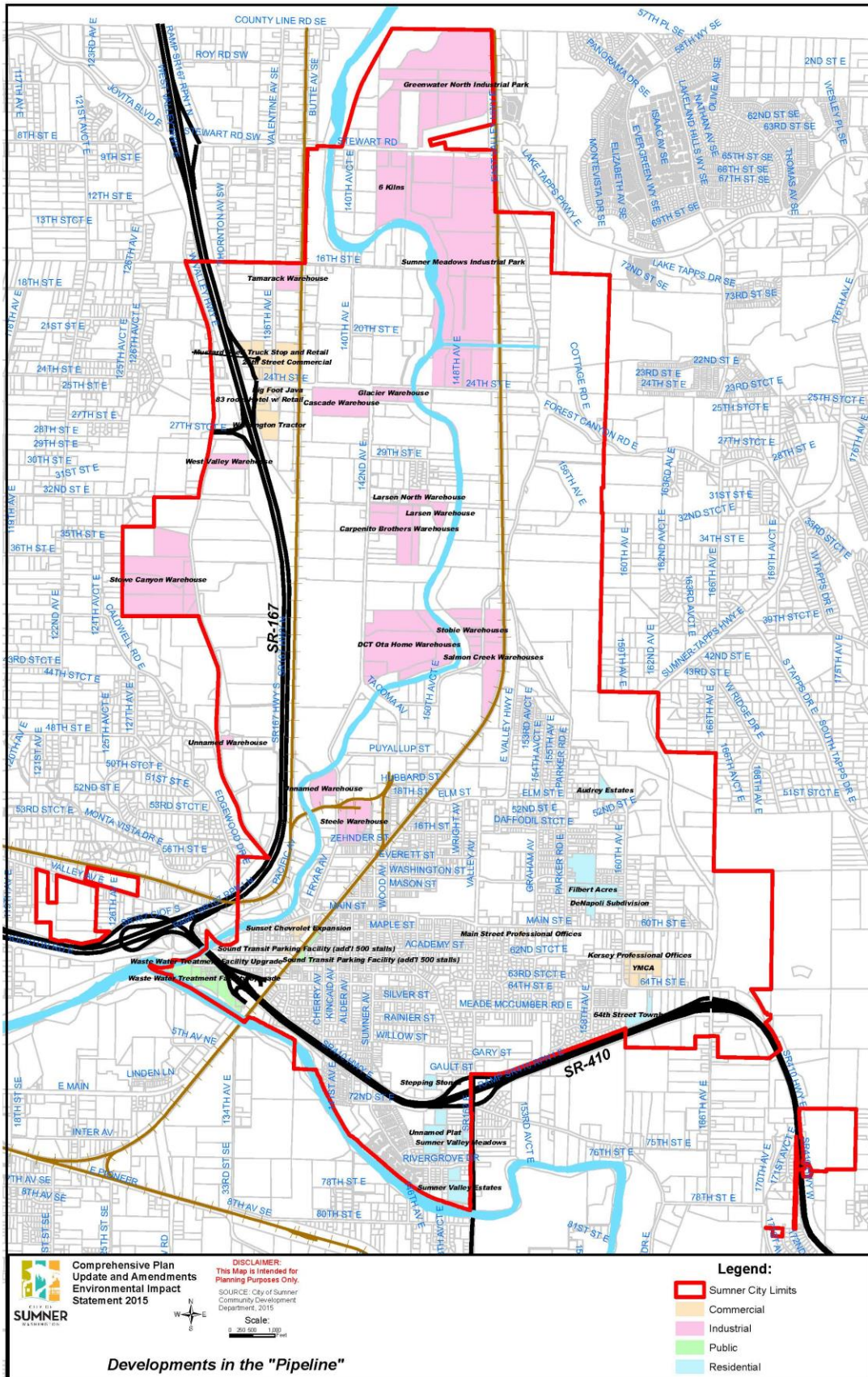
Exhibit 3-18. Development in the Pipeline

Project	Commercial/Non-Residential	
	Square Footage	Residential Units
YMCA	107,500	
Washington Tractor	30,000	
83 room Hotel w/ Retail	19,700	
Big Foot Java	600	
24th Street Commercial	112,375	
Mustard Seed Truck Stop and Retail	12,500	
Sound Transit Parking Facility (add'l 500 stalls)	n/a	
Main Street Professional Offices	5,866	
Kersey Professional Offices	31,200	
Waste Water Treatment Facility Upgrade	n/a	
Sunset Chevrolet Expansion	1,200	
Carpenito Brothers Warehouses	350,197	
Sumner Meadows Industrial Park	3,300,000	
6 Kilns	330,000	
Greenwater North Industrial Park	2,132,100	
Salmon Creek Warehouses	307,000	
Steele Warehouse	206,502	
Unnamed Warehouse	50,000	
Stowe Canyon Warehouse	605,000	
Larsen North Warehouse	62,000	
Larsen Warehouse	50,250	
Stobe Warehouses	157,000	
West Valley Warehouse	128,800	
DCT Ota Home Warehouses	1,102,500	
Tamarack Warehouse	176,000	
Cascade Warehouse	354,000	
Glacier Warehouse	50,000	
Stepping Stones		9
Sumner Valley Estates		34
Unnamed Plat		32
Sumner Valley Meadows		13
64th Street Townhouses		56
Audrey Estates		8
DeNapoli Subdivision		5
Filbert Acres		55
Total	9,682,290	212

Source: City of Sumner 2014, BERK Consulting 2014

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Exhibit 3-19. Development in the Pipeline Map



Source: City of Sumner 2015

Land Uses – Surrounding Vicinity

Determination of general use patterns of surrounding lands was based on review of aerial photos. In the areas immediately surrounding the current plan area, the following uses are predominately found:

- **Pacific and Auburn areas:** heavy commercial, residential, and vacant
- **Lake Tapps vicinity:** single-family residential, some commercial and vacant land (see “East Hill Reduction Area” for more detail on that specific area)
- **South along SR 162:** primarily agriculture and scattered housing (see “Orton Junction Expansion Area” for more detail on that specific area)
- **Southwest near Puyallup (Traffic Avenue vicinity):** commercial, multifamily and single-family residential, and agriculture
- **West in Edgewood:** primarily large-lot, single-family residential

Citywide

The following describes the existing land use at areas where the land use designations and/or zoning are proposed to change as part of any of the alternatives:

- **Neighborhood Commercial to Light Manufacturing (M-1):** The existing land use at 1418 Wood Avenue is a gutter installation construction company.
- **Add the former Sumner Meadows Golf Course to the Manufacturing/Industrial Center Overlay:** The former Sumner Meadows Golf Course is currently vacant and not being actively used for a land use.
- **Central Business District:** The Central Business District currently consists of a mix of land uses including office, retail, residential and services.
- **Add the Fleischmann’s Property to the Manufacturing/Industrial Center Overlay:** The current land use is a vinegar distillery.
- **East Valley Highway MDR Property change to M-1 Designation:** The property currently contains a mix of vacant and single-family residential properties.
- **AG Property to Residential Protection:** The property is largely in leased farming activities but is mostly under public ownership.

East Sumner

Exhibit 3-20

Exhibit 3-11 identifies the existing land use in the East Sumner Neighborhood. The predominant land uses are single-family (38%), commercial (29.3%) and vacant (19.8%). Other land uses include multi-family residential (6.5%), agriculture/mining (0.5%), parks and recreation (3.6%), and industrial (2.3%). Commercial development is concentrated along 64th St. E and 60th St. E. Commercial land uses include a mix of restaurants, services, offices and retail with associated surface parking areas. A new YMCA facility is current under construction at the northeast corner of the intersection of 160th Ave. E and 64th St. E. Significant wetland areas exist between 60th St. E and 64th St. E.

Exhibit 3-20. Existing Land Use Statistics – East Sumner Neighborhood

Existing Land Use	Acres (City Limits)	Percent (Total)
Agriculture/Mining ⁴	0.7	0.5%
Commercial/Services ²	37.6	29.3%
Industrial	3.0	2.3%
Multi-Family Residential ¹	8.3	6.5%
Parks & Recreation	4.6	3.6%
Civic/Public ³	0.0	0.0%
Single Family Residential	48.8	38.0%
Vacant	25.4	19.8%
Total Acres (Approx.)	128.40	100%

Source: City of Sumner 2015

Impacts

Impacts Common to All Alternatives

As development occurs over time existing land uses will convert to land uses consistent with the Comprehensive Plan. The following series of exhibits shows the existing land uses and what they could convert to under the alternatives. The current plan area has similar land conversion impacts under all alternatives with the most significant proposed changes occurring in the East Sumner Neighborhood under Alternatives 2 and 3. Only minor differences are proposed between land use designations between Alternatives 2 and 3. The land use conversions based on the comprehensive plan land use designations are consistent in the East Sumner Neighborhood for all alternatives.

For reference, the following sections refer to Comprehensive Plan and/or Zoning classifications:

AG	Agricultural
R-P	Residential-Protection
LDR	Low Density Residential (number extensions refer to differing densities/lot sizes)
MDR	Medium Density Residential
HDR	High Density Residential
NC	Neighborhood Commercial
MUD	Mixed Use Development
CBD	Central Business District
GC	General Commercial
IC	Interchange Commercial
M-1	Light Manufacturing
M-2	Heavy Manufacturing
UV	Urban Village
PPUF	Public and Private Utilities and Facilities

Vacant Land Conversions

Overall, approximately 1,055 acres of vacant land would convert to other uses within the current plan area under all alternatives (Exhibit 3-21. Vacant Land Conversions and Area). Approximately 86% of vacant land in the current plan area is located within the city limits. Most of the vacant land conversions in the current plan area (approximately 694 acres) would convert to industrial uses within the city limits. The next largest conversions would include residential (approximately 136 acres converting to either single family or multifamily) and commercial uses (approximately 101 acres). Smaller amounts would convert to other uses, including mixed uses (UV designation), and public uses (PPUF designation). A small amount of property currently vacant has two distinct land use designations.

Exhibit 3-21. Vacant Land Conversions and Area

Potential Change to Following Use Types	City Acres	UGA Acres	Total Acres	Overall Percentage
Commercial	100.8	1.2	102.0	8%
Industrial	694.5	0	694.5	57%
Multifamily	24.9	0	24.9	2%
Single family	111.5	92.2	203.7	17%
Mixed use	31.9	0	31.9	3%
Public/Civic	83.2	76.8	160.0	13%
Split Zone	7.6	0	7.6	0.6%
Total	1,054.4	170.2	1,224.7	100%

Source: City of Sumner 2014

Agricultural Land Conversions

In the current plan area, approximately 469 acres currently in agricultural, mining, or timber use (generally called resource uses for purposes of this analysis) would be converted to non-resource uses under all alternatives (Exhibit 3-22).

Approximately 260 acres would convert to residential uses (single family and multifamily). Approximately 26 acres of resource land (predominantly agricultural) within the city limits would convert to industrial use and 0.7 acres of resource land uses within the city limits would convert to mixed uses.

Exhibit 3-22. Agricultural Land Conversions and Area

Potential Change to Following Use Types	City Acres	UGA Acres	Total Acres	Overall Percentage
Commercial	0.7	0	0.7	0%
Industrial	25.7	0	25.7	5%
Multifamily	6.5	0	6.5	1%
Single family	244.9	81.8	326.7	59%
Mixed use	0.7	0	0.7	0%
Public/Civic	103.3	0	103.3	19%
Split Designation	86.7	0	86.7	16%
Total	468.5	81.8	550.3	100%

Source: City of Sumner 2014

Single-Family Residential Land Conversions

Approximately 196 acres of land currently under single-family residential use would convert to other uses under all alternatives: approximately 64 acres (29%) would convert to multifamily use, 64 acres (29%) would convert to mixed uses, and 12.9 acres (6%) would convert to industrial uses (Exhibit 3-23). The remaining acreage would convert to commercial and public uses. Most of these land use conversions would occur in the city limits, where single-family uses are found in multifamily, industrial, and commercial zones.

Exhibit 3-23. Single-Family Residential Land Conversions and Area

Potential Change to Following Use Types	City Acres	UGA Acres	Total Acres	Overall Percentage
Commercial	17.9	10.3	28.2	13%
Industrial	12.9	0	12.9	6%
Multifamily	85.3	0	85.3	39%
Single family	n/a	n/a	n/a	0%
Mixed use	63.8	0	63.8	29%
Public/Civic	0.0	10.4	10.4	5%
Split Designation	16.0	0	16.0	7%
Total	195.9	20.7	216.6	100%

Source: City of Sumner 2014

Multi-Family Residential Land Conversions

Approximately 52 acres of multifamily land within the current plan area would convert to other uses (Exhibit 3-24). Most of this conversion would occur on the approximately 25 acres of land converting to single-family uses. Approximately 14 acres would convert to mixed uses and another 11 acres would convert to commercial uses. The remainder (less than 1 acre) would convert to industrial uses under all alternatives.

Exhibit 3-24. Multi-Family Residential Land Conversions and Area

Potential Change to Following Use Types	City Acres	UGA Acres	Total Acres	Overall Percentage
Commercial	11.1	0.9	12.0	18%
Industrial	0.5	0	0.5	1%
Single family	25.0	12.7	37.7	58%
Mixed use	13.8	0	13.8	21%
Public/Civic	1.1	0	1.1	2%
Split Designation	3.6	0	3.6	6%
Total	51.5	13.6	65.1	100%

Source: City of Sumner 2014

Commercial Land Conversion

Approximately 161 acres would convert to industrial uses while another 46 acres would convert to mixed use and another 2 acres would convert to residential uses when properties redevelop and conform to the City or County land use designations (Exhibit 3-25).

Exhibit 3-25. Commercial Land Conversions and Area

Potential Change to Following Use Types	City Acres	UGA Acres	Total Acres	Overall Percentage
Multi-Family	1.6	0	1.6	1%
Industrial	161.2	0	161.2	73%
Single family	0.4	8.2	8.6	4%
Mixed use	45.9	0	45.9	21%
Public/Civic	2.5	0	2.5	1%
Split Designation	14.0	0	14.0	6%
Total	211.5	8.2	219.7	100%

Source: City of Sumner 2014

Industrial Land Conversions

Approximately 17 acres of industrial land in the current plan area is expected to be converted to other uses as redevelopment occurs that more closely aligns existing uses with their underlying zoning. Approximately 4.6 acres (27%) of this land would be converted to commercial uses with the remainder to public, mixed-use, or residential designations (Exhibit 3-26).

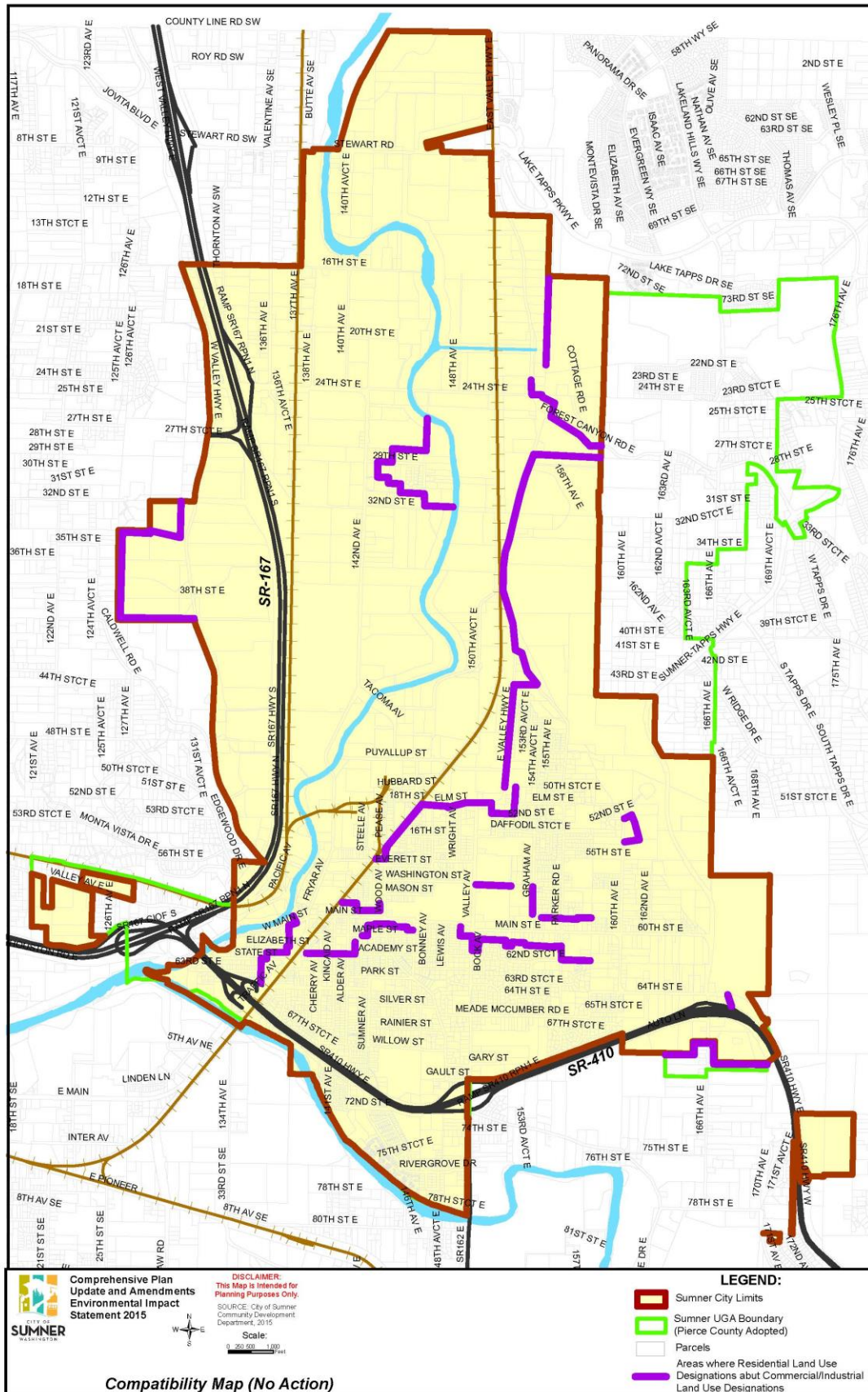
Exhibit 3-26. Industrial Land Conversions and Area

Potential Change to Following Use Types	City Acres	UGA Acres	Total Acres	Overall Percentage
Multi-Family	0.5	0	0.5	3%
Commercial	4.6	0	4.6	27%
Single family	0.0	6.5	6.5	38%
Mixed use	3.7	0	3.7	22%
Public/Civic	1.8	0	1.8	11%
Total	10.6	6.5	17.1	100%
Source: City of Sumner 2014				

Land Use Compatibility

Areas where residential uses abut commercial or industrial uses in the city limits would be generally the same under all alternatives with the minor differences highlighted in the analysis of impacts specific to the alternatives. Principal areas where land use compatibility between residential and commercial or industrial uses occurs are generally along East Valley Highway from the northern city limits to Elm Street and along an east-west line where commercial uses in Downtown meet with residential neighborhoods to the south. In addition to these areas, smaller pockets of residential-industrial adjacency occur in the north Valley area, and residential-commercial adjacency occurs in the southern part of the city limits. Exhibit 3-27 shows locations of land use compatibility between residential and industrial or commercial uses in the current plan area.

Exhibit 3-27. Land Use Compatibility (No Action)



Source: City of Sumner 2015

Surrounding Land Uses

Generally, very little conflict exists between planned land uses in the current plan area and surrounding jurisdictions. Land uses in the cities of Auburn, Bonney Lake, Pacific, and Puyallup are compatible with adjacent uses in the current plan area. Compatibility with unincorporated Pierce County is addressed below under impacts specific to each alternative.

Although residential uses, and in some cases future land use designations, in the City of Edgewood abut industrial and commercial designations along the western city limits, a steep hillside provides a natural buffer for the most part; in some areas of Sumner, future industrial development could produce noise but the City could apply SMC Chapter 8.14 Noise Control. In the remaining area where residential uses in Edgewood directly abut Sumner's commercial and industrial designations at the bottom of the hill (roughly between 20th Street East and 32nd Street East), the City of Edgewood has designated this area as commercial, and therefore, uses can be expected to transition from residential to more compatible commercial uses in the future.

East Sumner

Exhibit 3-28 compares the zoning between alternatives in the East Sumner Neighborhood. The largest proposed zoning district for Alternatives 2 and 3 will be the new Urban Village (UV) designation that allows for a mix of land uses with an emphasis on land uses that support a compact walkable environment with access to transit. The conversion of wetlands is less likely under Alternative 2 than 3 due to the lack of an off-site wetland mitigation bank and significant public improvements.

Exhibit 3-28. Comparison of Zoning in East Sumner by Alternative

Zoning Districts	Acreage		Difference
	No Action	Alts 2 and 3	
General Commercial (GC)	59	44	-15
Neighborhood Commercial (NC)	17	0	-17
Medium Density Residential	9	12	3
Low Density Residential 12000	25	32	7
Low Density Residential 8500	27	23	-4
Low Density Residential 6000	19	0	-19
Low Density Residential 4000	18	0	-18
Urban Village (New)	0	64	64
Total*:	174	175	
Wetlands	14	2	12
*Difference due to rounding			

Source: MAKERS 2015, BERK Consulting 2015

Impacts Specific to the No Action Alternative

Citywide

LAND CONVERSIONS

Under the No Action Alternative land use designations and zoning would be retained development would infill on vacant lands, notably employment uses along vacant properties in the vicinity of Stewart Road and on East Hill vacant and partially developed lots. Urban infill would occur on remaining scattered vacant and partially developed sites. Compared to the Action Alternatives, less land would convert from multi-family residential to manufacturing uses along the East Valley Highway. Less land in the downtown area would convert to residential use as existing land use designations, zoning and requirements for the condominium form of ownership continue the amount of residential development

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that will occur. Less land would convert from public-private utilities and facilities to residential uses by maintaining the existing comprehensive plan and zoning designations in all areas.

LAND USE COMPATIBILITY

The No Action alternative does not result in changes to land use and zoning designations that would have an effect on land use compatibility. Land uses are generally compatible under the No Action Alternative. There are areas of differential uses and densities as noted on Exhibit 3-27, and City zoning, design, and landscaping standards would provide for appropriate transitions.

East Sumner

LAND CONVERSIONS

Under the No Action Alternative less land would convert to uses consistent with the land use and zoning designations than under the two action alternatives. The lack of public improvements, including street improvements and off-site wetland mitigation, along with maintaining the existing zoning designations will continue to limit land use conversions in the East Sumner Neighborhood.

LAND USE COMPATIBILITY

Future land uses are generally compatible under the No Action Alternative and consistent with the Urban Village land use designation. The Urban Village Designation allows for a mix of residential, commercial and institutional uses in a compact and walkable environment.

Impacts Specific to the Minimal Zoning Action

Citywide

LAND CONVERSIONS

A minor amount of additional land (approximately 0.4 acres) would convert to manufacturing uses under the Minimal Zoning Action due to the designation of additional property to Light Manufacturing (M-1) from Neighborhood Commercial (NC). In addition approximately 96 acres will convert from Agricultural (AG) to Residential Protection (RP) and approximately 16.3 acres will convert from Public-Private Utilities and Facilities (PPUF) to Low Density Residential (LDR). Additional land would convert to residential uses and at higher densities in the Central Business District (CBD) due to the elimination of the condominium ownership requirements around the train station. Due to the inclusion of additional properties in the Manufacturing/Industrial Center (MIC) such as the Fleishmann's Property and the former Sumner Golf Course additional land may convert more rapidly to manufacturing and industrial use as a result of the incentives that are included for properties within the MIC District; underlying zoning continues to allow such uses. (See Exhibit 3-29 and Exhibit 3-30.)

Exhibit 3-29. Additional Land Use Conversions Statistics for Minimal Zoning Action Alternative

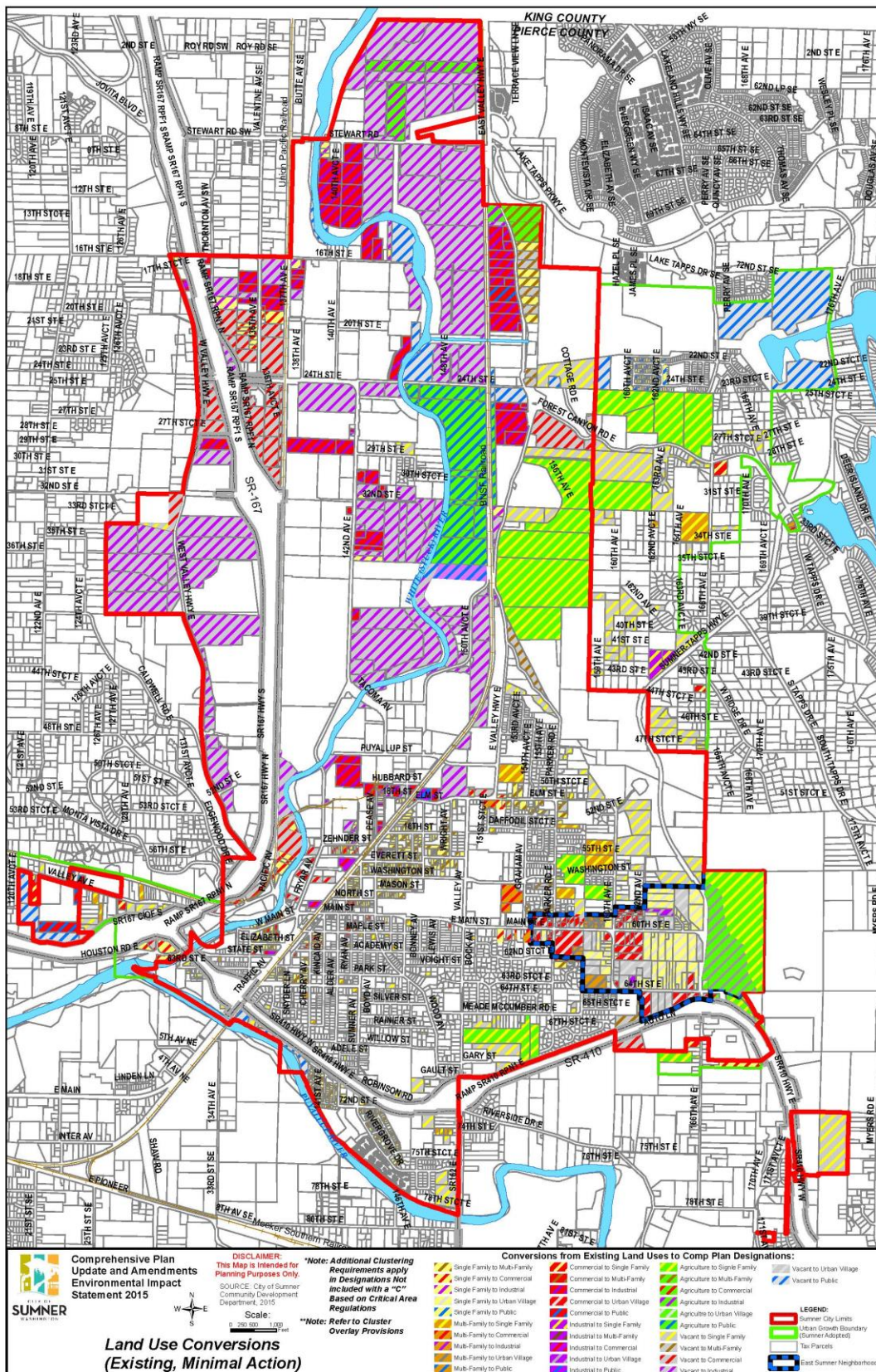
Existing Land Use	Proposed Land Use	Acres
Commercial	Light Industrial	0.4
Agricultural	Residential Protection	96.4
Public	Single-Family Residential	16.3
Total:		113.1

Source: City of Sumner 2015; BERK Consulting 2015

LAND USE COMPATIBILITY

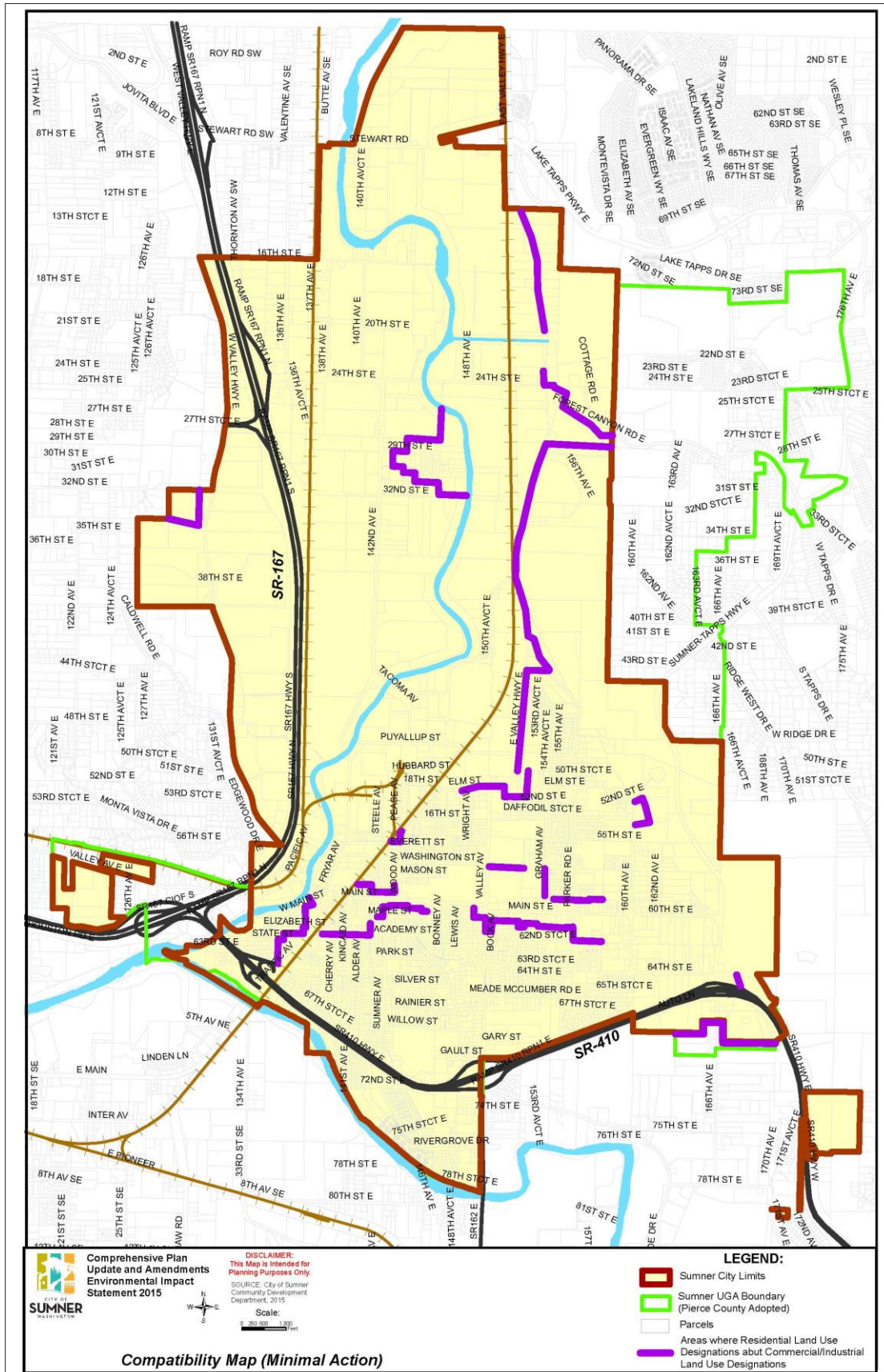
Land uses are generally compatible under this alternative with no amendments to land use designations that will significantly impact land use compatibility. See Exhibit 3-31.

Exhibit 3-30. Land Use Conversions for Minimal Zoning Action



Source: City of Sumner 2015

Exhibit 3-31. Land Use Compatibility for Minimal Zoning Action



Source: City of Sumner 2015

East Sumner

LAND USE CONVERSION

Additional land will convert to uses consistent with the comprehensive plan Urban Village designation and proposed zoning under this alternative. The zoning and minor public improvements included in this alternative will spur additional land conversions in the East Sumner Neighborhood.

LAND USE COMPATIBILITY

Land uses are generally compatible under this alternative with no amendments to land use designations that will significantly impact land use compatibility. The Urban Village Comprehensive plan land use designation is intended to accommodate a mix of uses in a compact walkable environment.

Impacts Specific to the Assertive Collaborative Action

Citywide

LAND CONVERSIONS

This alternative includes all of the land use changes discussed above for Alternative 2. Additional land use changes include several properties along the East Valley Highway (approximately 26.1 acres) that will be changed from MDR to M-1. In the CBD the elimination of the condominium ownership requirement may increase the rate of land conversion. See Exhibit 3-32, and Exhibit 3-33.

Exhibit 3-32. Additional Land Use Conversion Statistics for Assertive Collaborative Action

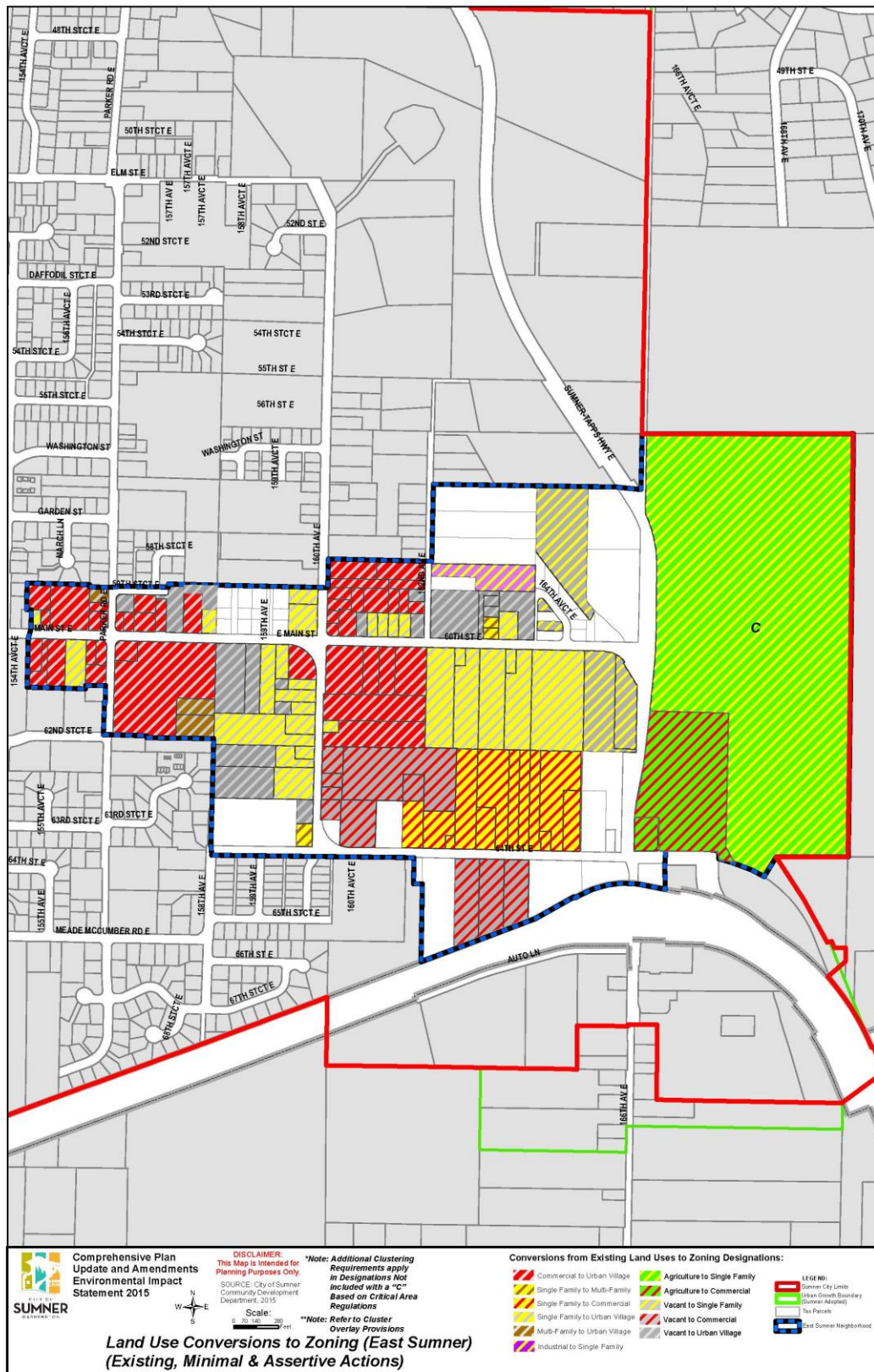
Existing Land Use	Proposed Land Use	Acres
Commercial	Light Industrial	0.4
Agricultural	Residential Protection	96.4
Public	Single-Family Residential	16.3
Multi-Family Residential	Industrial	26.1
Total:		139.2

Source: City of Sumner 2014; BERK Consulting 2014

LAND USE COMPATIBILITY

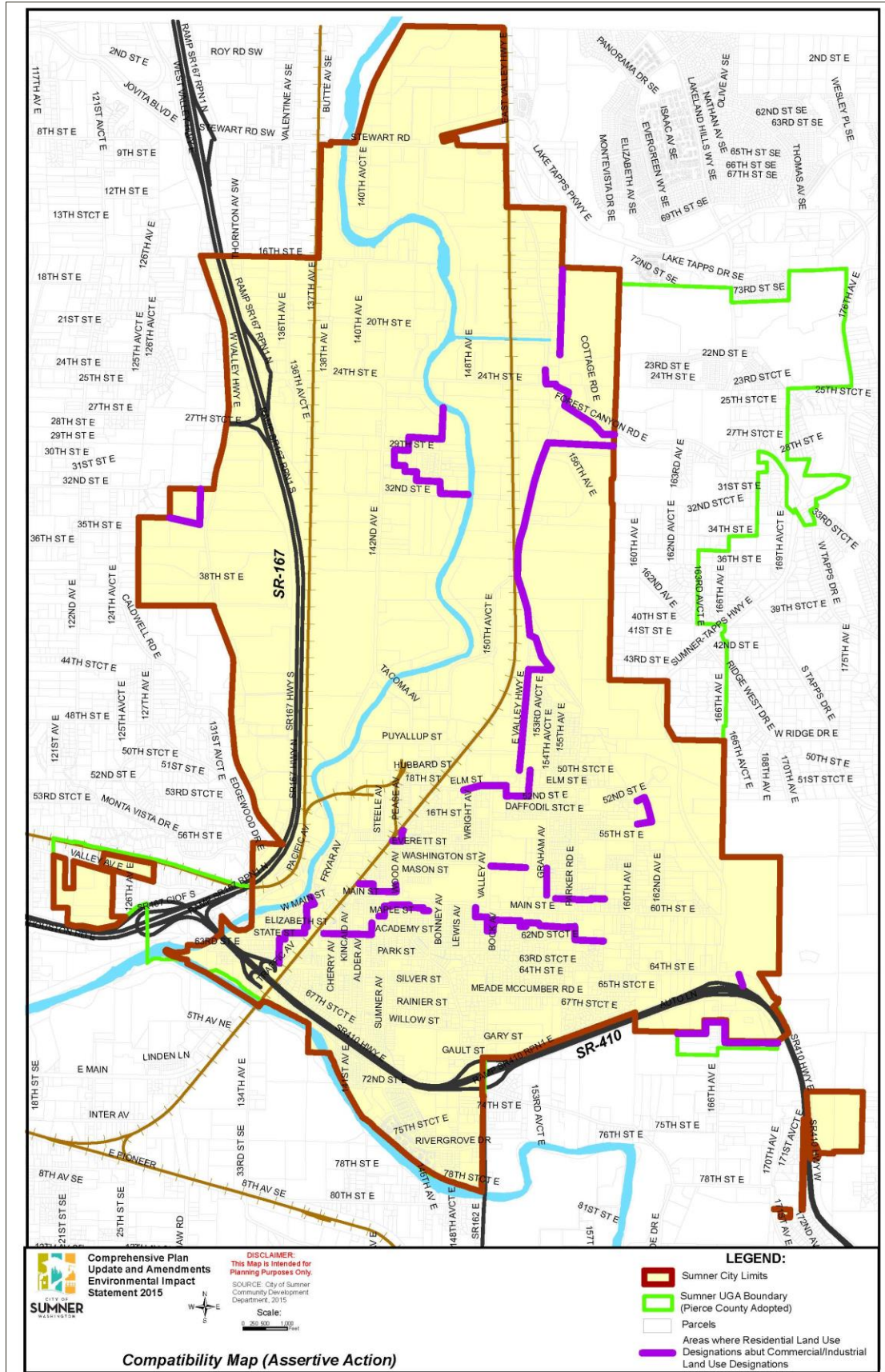
Land uses are generally compatible under this alternative with no amendments to land use designations that will significantly impact land use compatibility. The change from MDR to M-1 along the East Valley Highway will increase the area of residential zoned land abutting M-1 industrial zoned properties just east of East Valley Highway. If the rezone were accomplished there would no longer be a separation of M-1 and LDR zones by the roadway. See Exhibit 3-34.

Exhibit 3-33. Land Conversions for Assertive Collaborative Action



Source: City of Sumner 2015

Exhibit 3-34. Land Use Compatibility for Assertive Collaborative Action



Source: City of Sumner 2015

East Sumner

LAND USE CONVERSION

The rate of land use conversions in East Sumner would be increased under this alternative due to the significant infrastructure investments by the City including new and existing street improvements, an off-site wetland mitigation bank, and open space and trail improvements. See Exhibit 3-35.

Exhibit 3-35. Land Conversions for East Sumner

Existing Land Use	Proposed Land Use	Acres
Commercial	Urban Village	35.1
Commercial	Single Family Residential	2.0
Multi-Family Residential	Urban Village	1.3
Single-Family Residential	Urban Village	27.3
Total:		38.4

Source: City of Sumner 2015

LAND USE COMPATIBILITY

Land uses are generally compatible under this alternative with no amendments to land use designations that will significantly impact land use compatibility. The Urban Village Comprehensive Plan land use designation is intended to accommodate a mix of uses in a compact walkable environment.

Mitigation Measures

Incorporated Plan Features

- The new Urban Village Zoning Designation in East Sumner would promote a mix of compatible land uses in a compact and walkable environment in Alternatives 2 and 3.

Applicable Regulations and Commitments

- 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.
- Per the City of Sumner's Zoning Code development is subject to setback, buffer and landscaping requirements to minimize impacts on adjacent land uses, particularly between commercial/industrial and residential development.
- Certain land uses are subject to conditional use review, which includes a more detailed review of land use compatibility.

Other Potential Mitigation Measures

- The City could review zoning and subdivision regulations to ensure that adequate setbacks, landscaping, and buffering are required where land use conflicts may occur.
- The City could consider implementing performance standards that would have to be met prior to approval of certain commercial/industrial developments to minimize any potential impacts on adjacent land uses.

Significant Unavoidable Adverse Impacts

All alternatives result in new construction to accommodate population and employment growth. New construction will result in changes of use and the characteristics of parcels of land, including potential demolition and displacement. These impacts could be mitigated by development regulations including design review and buffer requirements.

3.7 Population, Employment, and Housing

Affected Environment

The purpose of this section is to identify current and forecast population, employment, and housing conditions and to compare forecast growth allocations to the capacity for growth under the alternatives.

Citywide

Population Growth

According to OFM forecasting, the current estimated population in 2014 was 9,545. In recent years, there has been slow population growth, with a compound annual growth rate of 1% between 2000 and 2010 and 0.25% between 2010 and 2014. This is similar to Pierce County's compound annual growth rate of 1% and 0.81% in the same periods respectively. See Exhibit 3-36.

Exhibit 3-36. Population Growth (1990 – 2014)

Jurisdiction	Population Estimates				Compound Annual Growth Rates		
	1990	2000	2010	2014	1990 - 2000 CAGR	2000 - 2010 CAGR	2010-2014 CAGR
Sumner	6,459	8,504	9,451	9,545	3%	1%	0.25%
Pierce County	586,203	700,820	795,225	821,300	2%	1%	0.81%

Source: US Census Bureau 1990, 2000, 2010 and PSRC 2014

Charged with regional planning programs, the Puget Sound Regional Council (PSRC) makes regular population, housing, and employment forecasts. Population allocations to the year 2035 equal 12,570 for the city limits (PSRC 2014) based on the Land Use Targets Worksheet that advances the 2030 Pierce County Countywide Planning Policy targets to 2035; this is a 33% increase over 2010 population estimates, with an annual growth rate of 2% over the 14-year period. See Exhibit 3-37.

Exhibit 3-37. PSRC Total Population Forecasts—Sumner

Year	2010	2025	2030	2031	2035
PSRC Population Forecasts	9,451	11,370	11,970	12,090	12,570

Source: PSRC 2014, OFM 2014

The population within the city limits has grown, as noted above, but its characteristics are similar to those of the population in 2000 in many respects. Exhibit 3-38 identifies the 2000 and 2010 Census (or 2013 American Community Survey [ACS]) information for Sumner compared with information for Pierce County as a whole. Areas of similarity between Sumner populations in 2000 and 2010 include sex, and household size. Areas of change between 2000 and 2010 include age, race and Hispanic origin as the community is becoming a little more diverse; education since greater educational attainment has taken place; and income, which has increased, but is still below the County median.

Exhibit 3-38. Summary of Population Characteristics—Sumner and Pierce County

Characteristic	2000 Sumner	2010 Sumner	2000 Pierce County	2010 Pierce County
Total Population	8,504	9,451	700,820	795,225
Median Age	35.4	38.2	34.1	35.9
Percent under 18 years old	26.50%	24.40%	27.20%	24.20%
Percent 65 years +	13.40%	14.90%	10.20%	12.30%
Percent Female	51.60%	51.80%	50.30%	50.30%
One Race				
Caucasian	90.30%	87.30%	78.40%	76.50%
African American	0.90%	1.20%	7.00%	7.30%
American Indian/Alaskan Native	1.40%	1.00%	1.40%	1.70%
Asian	1.70%	2.40%	5.10%	6.40%
Native Hawaiian/Pacific Islander	0.20%	0.40%	0.80%	1.50%
Other	2.40%	3.40%	2.20%	4.30%
Two or More Races	3.00%	4.30%	5.10%	6.70%
Hispanic/Latino of Any Race	6%	10.10%	5.50%	9.90%
Household Size	2.4	2.37	2.6	2.59
Education and Income Characteristic	2000 Sumner	2013 Sumner	2000 Pierce County	2013 Pierce County
Education: High School Diploma or Greater	85.80%	91.30%	86.90%	90.50%
Education: Bachelor's Degree or Higher	19.60%	18.80%	20.60%	24.00%
Median Household Income	\$38,598	\$50,206	\$45,204	\$59,478

Source: U.S. Census Bureau 2000 and 2010; ACS 2009-2013 5-Year Estimates

Employment

The Sumner economy is made up of businesses in food manufacturing, wood product manufacturing, and warehousing and distribution, as well as retail and services.

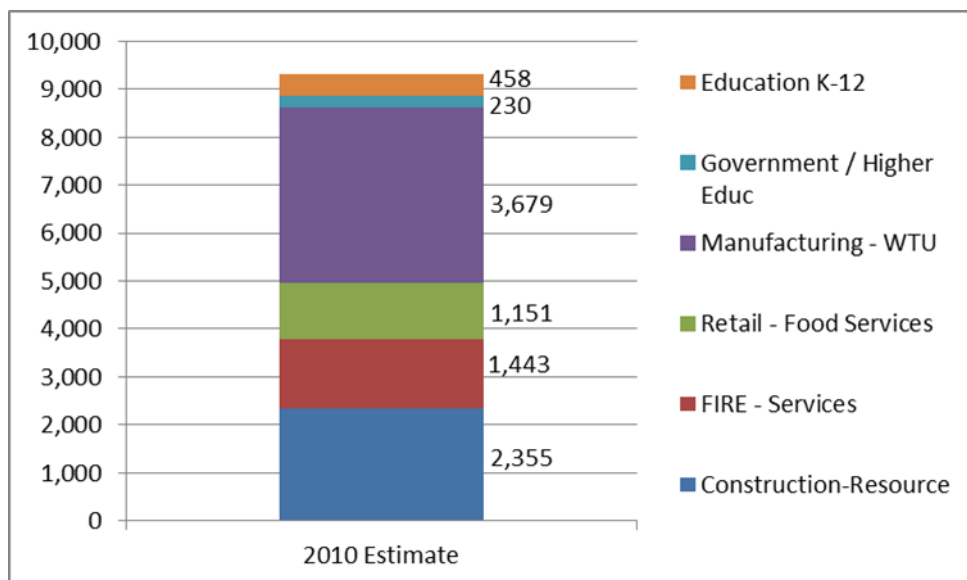
Headquartered businesses and major industrial operations include:

- **Headquarters:** Bellmont Cabinet Company, Parsons Construction, Shining Ocean, Dillanos Coffee, Investco, Brooks Shoes
- **Major industrial centers:** REI Distribution Center, Costco Distribution Center, Target Distribution Center, Golden State Foods, Maersk, Medline, Green Mountain Coffee Roasters, Inc.

(Puyallup/Sumner Chamber of Commerce 2009; Keurig.com 2014)

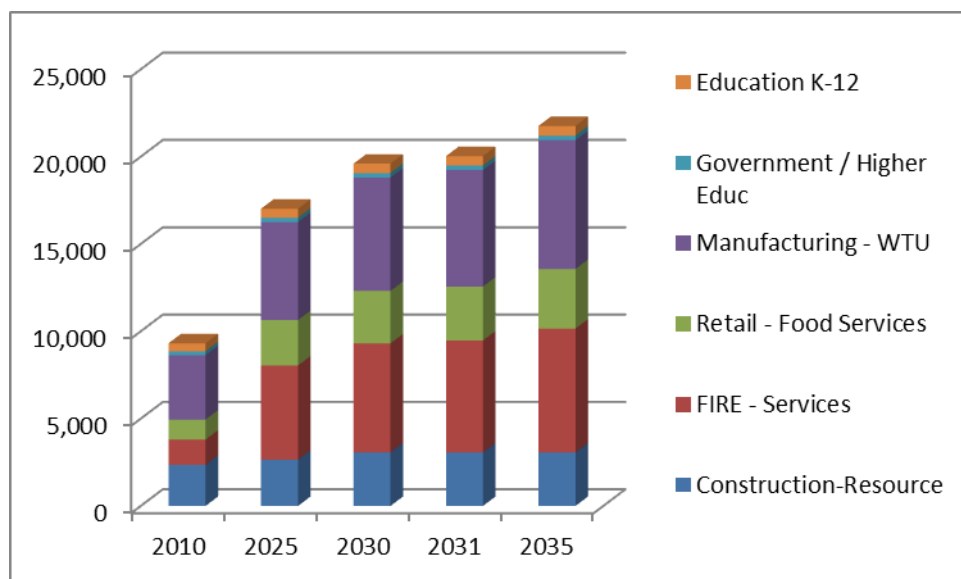
Current employment estimates provided by PSRC indicate that manufacturing/warehousing, construction/resources, and services are the largest employment sectors in the Sumner city limits, which comprise 39% of all current employment. 2035 forecasts expect the larger categories of employment to be wholesale trade, services, and retail (33% of jobs), and for the total number of jobs to more than double, from 2010 estimate of 9,316 to 21,762 in 2035. See Exhibit 3-39 and Exhibit 3-40.

Exhibit 3-39. 2010 Employment—Sumner



Source: PSRC 2014

Exhibit 3-40. Forecast Employment—Sumner



Source: PSRC 2014

The majority of Sumner residents age 16 and over are in the labor force: 70.1%, compared to 66.8% in Pierce County. Sumner has slightly lower unemployment rate. See Exhibit 3-41

Most workers commute to work, but the percentage of workers taking alternative forms of transportation has increased and is higher than in Pierce County as a whole. In 2013, most Sumner residents commuted to work by single-occupant vehicles (76%), compared to 78% of Pierce County. In terms of alternative forms of transportation, 21% of Sumner residents drove in a carpool, took transit, or walked to work compared to 18% in Pierce County. Approximately 4% worked at home in both the City and County.

Exhibit 3-41. Current Labor Force, 2009-2013 5-Year Estimates

	Population 16+ Years Old	% in Civilian Labor Force	Employed	Percent Unemployed
Sumner	7,100	70.1%	61.3%	8.8%
Pierce County	630,800	62.80%	56.0%	10.9%

Source: 2009-2013 American Community Survey 5-Year Estimates

Exhibit 3-42. Means of Transportation to Work, 2009-2013 5-Year Estimates

	Sumner	Pierce County
Total Workers 16 and Older	4,198	362,381
Car, truck, or van - drove alone:	75.5%	78.2%
Car, truck, or van - carpooled:	11.2%	9.9%
Public transportation (excluding taxicab):	6.3%	3.4%
Walked:	2.5%	2.7%
Taxicab, motorcycle, bicycle, or other means:	1.0%	1.6%
Worked at home:	3.5%	4.2%

Source: 2009-2013 American Community Survey 5-Year Estimates

Existing Households

According to the 2010 Census, a total of 3,980 households were located within the Sumner city limits. The average household size is 2.37 persons per household (U.S. Census Bureau 2010); according to PSRC the average household size is 2.37 in 2010 expected to decrease to 2.18 by 2035 (PSRC 2014). Since 1990, average household size is declining. Families comprised 2,454 of the total households in the city limits (3,980) or 61.7% of all households, as of 2010. Exhibit 3-43 provides a breakdown of characteristics of households in the city limits.

Exhibit 3-43. Household Characteristics and Trends—City of Sumner

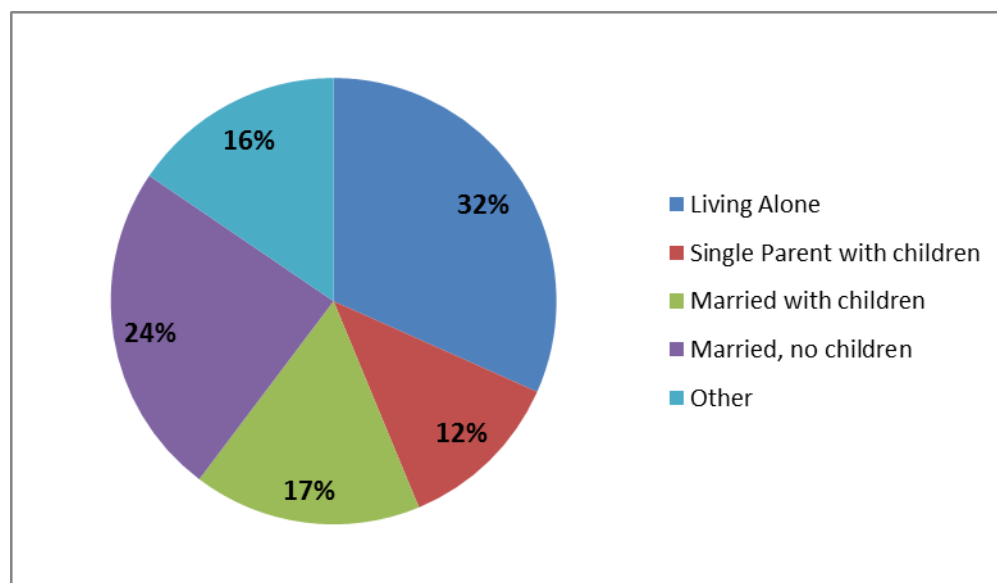
Characteristics	1990	%	2000	%	2010	%	Percentage Change 1990–2000	Percentage Change 2000–2010
Number of Households								
Total population	6,281	100%	8,504	100%	9,451	100%	35%	11%
Household population	6,213	99%	8,438	99%	9,445	100%	36%	12%
Average household size	2.47	—	2.4	—	2.37	—	3%	-1%
Total households	2,519	100%	3,517	100%	3,980	100%	40%	13%
Special Needs Groups								
Elderly 65+	920	15%	1,137	13%	1,407	15%	24%	24%
Elderly 75+	451	7%	572	7%	719	8%	27%	26%
Small households (2–4 persons)	1,473	59%	2,145	61%	2,387	60%	46%	11%
Large households (5+ persons)	209	8%	292	8%	333	8%	40%	14%
Single person	703	28%	1,080	31%	1,260	32%	54%	17%
Female-Headed household	310	12%	482	14%	584	15%	55%	21%

Source: U.S. Census Bureau 1990, 2000 and 2010

While Sumner clearly has a family-oriented character, its households are generally smaller with a collective majority in those that live alone or are married with no children (combined 56%). See Exhibit 3-44.

Exhibit 3-44. Sumner Household Composition: 2010 Census

Total households 2010: 3,980



Source: U.S. Census Bureau 2010

Special Needs Groups

ELDERLY

Elderly population³ within the city limits has increased steadily. According to 2010 Census data, the number of residents over the age of 65 was 1,407 persons, or 15% of the total population. From 1990 to 2000, the elderly population increased by 24% (from 920 to 1,137 persons). From 2000 to 2010, the elderly population increased also by 24% (from 1,137 to 1,407).

Local assisted living, adult family, and boarding homes include the following:

- Franklin House, 5713 Parker Road
- Mountain View Adult Family Home, 15922 66th St East
- Stafford Suites, 15519 62nd St East
- Sumner Cottage, 209 Mountain Circle Drive
- Sumner Meadows, 7417 166th Ave East

GROUP QUARTERS

According to 2010 Census information, a total of 6 people live in group quarters, or less than 1% of Sumner's total population and in 2013, the American Community Survey estimated 20 persons; this may not address more recently constructed assisted living facilities. Group quarters include institutional housing such as nursing homes, assisted living facilities, hospices, schools for the mentally or chronically ill, and correctional institutions; and non-institutionalized population such as college dormitories, military quarters, group homes, religious group quarters, agricultural workers dormitories, or other non-institutional group quarters. Compared to total population, the number of persons in group quarters likely remains very low.

FEMALE-HEADED HOUSEHOLDS

Female-headed households with children tend to have lower incomes than married couple families or single male-headed households, and oftentimes have higher demand for affordable housing units. As of 2010, the total number of female-headed households was 584, roughly 15% of total households. The percentage of households that are female-headed households slightly increased from 14% of all households in 2000 to 15% of total households in 2010.

SMALL HOUSEHOLDS

Small households (2 to 4 persons) make up the predominant household type in the city limits, 2,387 households or 60% of total households as of 2010. Between 2000 and 2010, the number of small households increased by 11% (from 2,145 to 2,387).

LARGE HOUSEHOLDS

Large households (five or more persons) in the city limits equaled 333 households or 8% of total of households in 2010. The number of large households has increased by 40% since 2000 (292 in 2000 to 333 in 2010). Larger households are often difficult to accommodate because of difficulties with financing the purchase of large enough housing. In addition, large units are often less affordable and rental units with 4 bedrooms or more can be difficult to find. Within the city limits, only 12% of housing units have 4 bedrooms or more (ACS 2009-2013 5 Year estimates).

HOMELESS POPULATION

According to a 1-day count in January 2012, there are 1,997 homeless persons in Pierce County (including individuals not housed, in emergency shelters and in transitional housing). The number of homeless children under the age 18 totaled 752. Approximately 1 of the homeless persons stated their

³ The U.S. Department of Housing and Urban Development (HUD) considers the elderly to be 62 years or older. The Census defines the elderly as 65 years or older. The information presented in this section uses the Census definition of elderly.

SUMNER COMPREHENSIVE PLAN UPDATE SEIS AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION

origin as Sumner. Within Pierce County, 43 non-profit community-based agencies provide housing opportunities and services to homeless individuals and families (Pierce County 2012).

According to the “McKinney-Vento” homeless student count, there are 251 homeless students in the Sumner School District area (which is larger than the Comprehensive Plan area). This definition of homeless includes students living doubled up, staying in a hotel/motel, living in a shelter, substandard housing, campground, living in a car, park, public place, or awaiting Foster Care placement (Personal communication from Carlene Hurd, Sumner/Bonney Lake Family Center, 2015).

SHELTER PROGRAMS AND OTHER AFFORDABLE HOUSING

Agencies providing housing for the homeless or low-income households in the Sumner area include but are not limited to Exodus Housing, Helping Hand House, Phoenix Housing, Archdiocesan Housing Authority, and Mi Casa. These agencies are described below.

Exodus Housing provides transitional housing and services to families in South King and eastern Pierce County communities. The organization is based in Sumner. Exodus serves 125 people annually scattered in Pierce and South King counties. They currently serve four families that are located in Sumner in three different complexes. Exodus manages 41 units for extremely low-income domestic violence families. The families, having experienced homelessness and domestic violence, are placed in apartments for 12 to 24 months. They receive transitional housing, individualized case management services and resources to assist them to become self-sufficient (www.gtcf.org).

Helping Hand House based in Puyallup serves families residing in Pierce County with at least one child, in situations where the family is homeless or nearly homeless. Helping Hand House provides the following services (Helping Hand House 2014):

- **Diversion/Rapid Re-housing** provides housing relocation and stabilization services and short-term and medium-term rental assistance from 3-12 months to assist families with children who are homeless or at imminent risk of homelessness to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.
- **Emergency Housing.** This program offers single-family housing and addresses basic needs for up to 90 days including case management and classes. It serves Puyallup and Sumner.
- **Transitional Housing.** This program provides single-family housing and intensive case management for up to 24 months emphasizing budgeting and saving money, life skills, and workforce training. It serves Orting, Eatonville, Sumner, Puyallup, Buckley, and Bonney Lake.
- **Permanent Supportive Housing.** This program provides single-family housing support, life-skills training, and intensive case management that taper as financial resources and skills improve. It serves Sumner and Tacoma.

Catholic Community Services (CCS) Family Housing Network, formerly Phoenix Housing Network, is a program of CCS Southwest. It serves low-income homeless families in Pierce County. The program offers a shelter program rotating to 24 different churches and schools, a day center for services and classes, rental assistance to at-risk families, employment workshops, transitional housing at 73 apartments throughout Pierce County, family counseling, and life skills classes (Catholic Community Services and Catholic Housing Services 2014).

In addition to emergency or transitional dwellings, Catholic Community Services and Catholic Housing Services operate the following low-income and special needs housing developments in Sumner:

- Kincaid Court: 39 units of senior housing
- Pomona Villa: 40 units of housing for seniors age 62 and older and the disabled
- Sumner Commons: 34 units for men and women age 62 and older
- Sumner Townhomes: 8 units of low-income housing for families

In addition, Mi Casa, a non-profit based in Edgewood, provides safe affordable housing for low-income people. It operates 38 units of permanent low-income housing in Puyallup, Sumner, and Edgewood (Mi Casa 2014). Mi Casa is a small organization with the purpose of providing low-income/affordable housing in the Sumner and Puyallup area. Mi Casa owns three triplexes in Sumner.

SUBSIDIZED HOUSING

According to PSRC subsidized housing data, there are a total of 149 subsidized housing units in 11 complexes within Sumner (PSRC 2013).

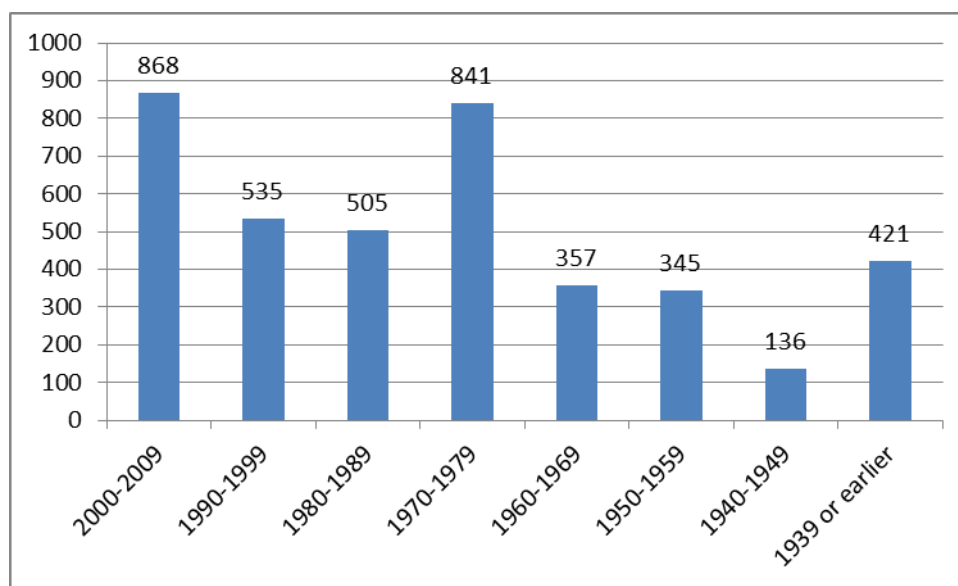
Housing Stock

According to the 2010 Census, approximately 4,279 housing units are located within Sumner city limits. Based on Washington State Office of Financial Management (OFM) information (OFM 2014), there are 4,305 dwellings in the city limits: 58% single family, 36% multifamily, and 6% mobile home and specials—similar to the 2010 Census.

Age of Housing

In terms of housing age, growth has been relatively steady over the decades. Approximately 22% of housing units were constructed between 2000 and 2009, 13% of housing units in the 1990s; 13% in the 1980s; 21.0% in the 1970s; 9% in the 1960s; 12% between 1940 and 1959; and 11% before 1939 (ACS 2009-2013 5-Year Estimates). See Exhibit 3-45.

Exhibit 3-45. Age of Housing Units



Source: 2009-2013 American Community Survey 5-Year Estimates

According to *Pierce County Buildable Lands Report for 2014* 13 multifamily units were constructed in 2006 representing a density of 17.35 units per acre.

Vacancy Rates

According to 2009-2013 ACS 5-Year Estimates, the overall vacancy rate is approximately 5%; in other words, 95% of housing units are occupied. The rental vacancy rate is about 3%, while the homeowner vacancy rate is about 1%. Rental vacancy rates have slightly increased by 0.2% and homeowner vacancy rates have decreased by 0.8% between 2010 and 2013. The national rental vacancy rate for metropolitan areas was around 7% in the third quarter 2014 (US Census Bureau 2014). Vacancy rates below 4% tend to indicate economic distress in the market, a recession, and/or a lack of available housing units for the local population.

Existing Housing Conditions

According to 2009-2013 ACS 5-Year Estimates, of the 3,813 dwelling units within the city limits, approximately 3.8%, or 144 units, were considered overcrowded (more than one occupant per room). In terms of selected housing characteristics, there were no housing units that lacked complete plumbing facilities. 2.8% lacked complete kitchen facilities, and 4.10% lacked telephone service. Of the housing units within the city limits, approximately 95% were heated via utility gas or electricity. Approximately 5% of units are heated via fuel oil, kerosene, or another source.

Household Income

Understanding household incomes in Sumner and in Pierce County as a whole provides a basis for measuring whether housing is affordable to residents. The median household income in the city limits was \$50,206 as of 2013 (ACS 2009-2013, 2013 dollars), lower than the estimated 2013 Pierce County median household income of \$59,204.

Exhibit 3-46 provides a breakdown of household income for both the City and Pierce County based on American Community Survey 2009-2013 5-Year Estimates.

Exhibit 3-46. Household Income—Sumner City Limits and Pierce County

Household Income	City 2000	%	City 2013	%	Pierce County 2000	%	Pierce County 2013	%
Total households	3,513	100.0%	3,813	100.0%	260,897	100.0%	300,623	100.0%
Median household income—all households	\$38,598	—	\$50,206	—	\$45,204	—	\$59,204	—
Less than \$10,000	207	5.9%	160	4.9%	18,639	7.1%	16,763	5.6%
\$10,000-\$14,999	251	7.1%	158	5.1%	13,841	5.3%	11,889	3.9%
\$15,000-\$24,999	456	13.0%	468	13.6%	30,639	11.7%	26,139	8.6%
\$25,000-\$34,999	651	18.5%	345	8.8%	34,324	13.2%	28,461	9.5%
\$35,000-\$49,999	708	20.2%	769	15.8%	46,521	17.8%	42,410	14.4%
\$50,000-\$74,999	736	21.0%	523	15.5%	58,734	22.5%	61,602	20.5%
\$75,000-\$99,999	296	8.4%	617	16.6%	30,989	11.9%	42,498	14.3%
\$100,000-\$149,000	183	5.2%	552	15.1%	19,130	7.3%	45,642	15.1%
\$150,000-\$199,999	14	0.4%	185	4.2%	4,081	1.6%	15,068	4.9%
\$200,000 or more	11	0.3%	36	0.4%	3,999	1.5%	10,151	3.2%

Source: U.S. Census Bureau 2000 and ACS 2009-2013 5-Year Estimates.

Exhibit 3-47 depicts income categories based on the County's median household income levels and compares it to the number of households in the city limits that would classify under that income category. Approximately 12% of city households were between 0% and 30% of the county median income. About 25% of city households had incomes equal to or below 50% of the county's median household income, and a total of 46% of city households met U.S. Department of Housing and Urban Development (HUD) definition of low income (80% of median income or lower).

Exhibit 3-47. Household Estimates by Percent of Pierce County Median Income*

	Income Ranges		Rounded (1,000s)		Estimated Households			
	Low	High	Low	High	Sumner	Sumner %	Pierce County	Pierce County
Under 30%	\$0	\$17,761	\$0	\$18,000	458	12.0%	36,494	12.1%
30 - 50%	\$17,761	\$29,602	\$18,000	\$30,000	501	13.1%	32,529	10.8%
50 - 80%	\$29,602	\$47,363	\$30,000	\$47,000	787	20.6%	48,159	16.0%
80 - 100%	\$47,363	\$59,204	\$47,000	\$59,000	342	9.0%	30,658	10.2%
100 - 120%	\$59,204	\$71,045	\$59,000	\$71,000	251	6.6%	29,569	9.8%
120% or Over	\$71,045	\$1,000,001	\$71,000	\$1,000,001	1,474	38.7%	123,213	41.0%
Total					3,813	100%	300,622	100%

Source: U.S. Census Bureau ACS 2009-2013

*Pierce County 2009-2013 median income: \$59,204.

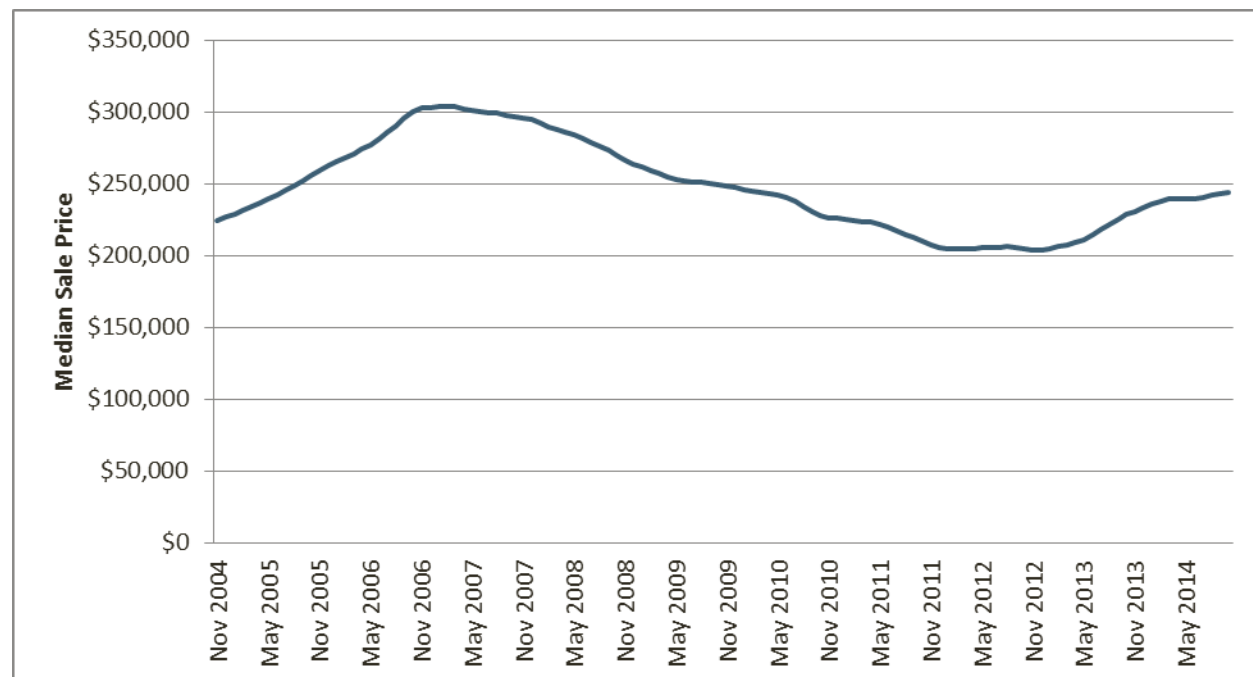
Housing Costs

OWNERSHIP HOUSING

According to the 2013 American Community Survey, the median home price within city limits was \$242,300, which is slightly higher than the median value of owner-occupied housing units in Pierce County of \$240,200 (U.S. Census Bureau, ACS, 2013). Approximately 43.8% of homes within the city limits fell within the \$200,000 to \$300,000 price range (U.S. Census Bureau, ACS, 2013).

According to recent sales information, the November 2014 home value in Sumner is approximately \$247,500, an increase of approximately 7.3% over the past year (Zillow 2014).

Exhibit 3-48. Sumner Median Sale Price of All Homes



Source: Zillow.com (accessed December 16, 2014).

RENTAL HOUSING

According to 2009-2013 American Community Survey, roughly 46% of all housing units within the city limits (1,859 units out of a total of 4,008 units) were rental units. The median gross rent was \$889 per month; about 60% of rental units had a gross rent that ranged from \$500 to \$999 per month; and 35% of rental units had a gross rent were over \$1,000.

Housing Cost Burden

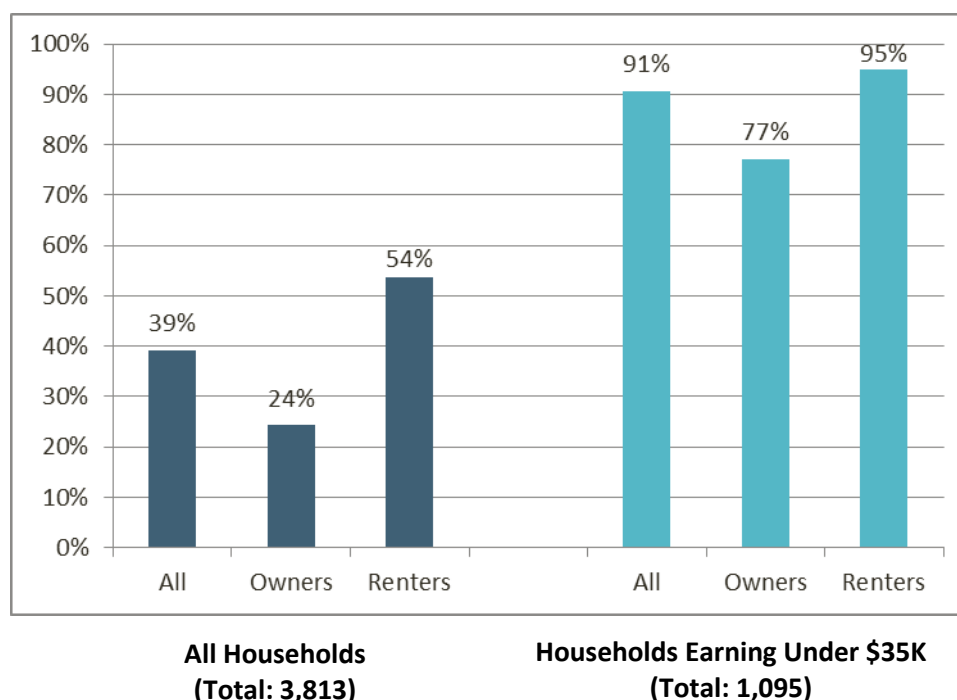
The generally accepted definition of affordability is for a household to pay no more than 30% of its annual income on housing. Housing affordability is a function of income, housing costs, and interest rates. Housing affordability measures the burden of expenditures for housing relative to a resident's income. Families who pay more than 30% of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation, and medical care. Housing affordability can be measured in several ways. The U.S. Census provides data on gross rent and monthly owner housing costs as a percentage of household income. For housing assistance purposes, HUD income limits are used for families of various sizes by county and metropolitan statistical area.

Approximately 39% of all households regardless of income are spending more than 30% of their income on housing, including 54% of all renters and 24% of all owners.

A vast majority of Sumner's households (91%) earning under \$35,000 a year are spending more than 30% of their income on housing, including nearly 95% of low-income renter households and 77% of low-income owner-occupied households.

Sumner's housing cost burden is similar to Pierce County, where 43% of all households are spending more than 30% of income on housing, and 85% of households earning less than \$35,000 are housing cost burdened.

Exhibit 3-49. Percent of Sumner Households Spending More than 30% of Income on Housing, 2009-2013 ACS 5-Year Average



Source: American Community Survey 5-Year Estimate, 2009-2013.

Affordability Gap: Owner Occupied Housing

The National Association of Home Builders/Wells Fargo Housing Opportunity Index identifies "the share of homes sold in that area that would have been affordable to a family earning the local median income, based on standard mortgage underwriting criteria." Information for the third quarter of 2014 indicates that 70.4% of the homes in the Tacoma Metropolitan Division are affordable to those earning the median family income, estimated by the index to be \$69,700, similar to HUD's estimates (National Association of Home Builders 2014).

In Sumner, more than half (about 58%) of owner occupied households have an income greater than \$71,000. See Exhibit 3-50.

Exhibit 3-50. Household Estimates of Owners by Percent of Median Income

	Income Ranges		Rounded (1,000s) Income Ranges		Pierce County		City of Sumner	
					Estimated HHs	Percent	Estimated HHs	Percent
	Low	High	Low	High				
Under 30%	\$0	\$17,761	\$0	\$18,000	11,615	6%	81	4%
30 - 50%	\$17,761	\$29,602	\$18,000	\$30,000	12,944	7%	123	7%
50 - 80%	\$29,602	\$47,363	\$30,000	\$47,000	23,469	13%	258	14%
80 - 100%	\$47,363	\$59,204	\$47,000	\$59,000	18,178	10%	169	9%
100 - 120%	\$59,204	\$71,045	\$59,000	\$71,000	18,437	10%	157	8%
120% or Over	\$71,045		\$71,000		100,283	54%	1,076	58%
Total					184,926	100%	1,864	100%

Source: American Community Survey 5-Year Estimates, 2009-2013.

Affordability Gap: Renter Occupied Housing

Breaking out renter occupied housing units according to income levels; households that rent housing in Sumner and Pierce County tend to have lower incomes. For example, estimated households earning 30% or below AMI represent 19% of Sumner renter households and 22% of all households in Pierce County. In general, Sumner has higher percentages of households in lower income categories and lower percentages of households in higher income categories compared to Pierce County. See Exhibit 3-51.



Exhibit 3-51. Household Estimates of Renters by Percent of Median Income

	Income Ranges		Rounded (1,000s) Income Ranges		Pierce County		City of Sumner	
					Estimated HHs	Percent	Estimated HHs	Percent
	Low	High	Low	High				
Under 30%	\$0	\$17,761	\$0	\$18,000	24,879	22%	378	19%
30 - 50%	\$17,761	\$29,602	\$18,000	\$30,000	19,585	17%	377	19%
50 - 80%	\$29,602	\$47,363	\$30,000	\$47,000	24,690	21%	530	27%
80 - 100%	\$47,363	\$59,204	\$47,000	\$59,000	12,479	11%	173	9%
100 - 120%	\$59,204	\$71,045	\$59,000	\$71,000	11,134	10%	94	5%
120% or Over	\$71,045		\$71,000		22,930	20%	397	20%
Total					115,697	100%	1,949	100%

Source: American Community Survey 5-Year Estimates, 2009-2013.

Exhibit 3-52 shows the number of renter households in each income category, and the estimated units that were reported to have rents that are affordable to that income category. Exhibit 3-52 compares renters (people) with housing rents (unit costs) and does not speak to the housing burden of any particular household or group. Very low income households may be renting at prices much more than they can afford, and median and upper income households may be paying a smaller proportion of their monthly income on rent.

Exhibit 3-52. Sumner Renter-Occupied Income and Current Rents

Ratio to Pierce County AMI \$59,204	Income Ranges		Monthly Housing Budget*		 Estimated Renter HHs		 Estimated	Gap
	Low	High	Low	High	Count	Percent	Units	over/(under)
Under 30%	\$0	\$18,000	\$0	\$450	378	19%	98	(280)
30 - 50%	\$18,000	\$30,000	\$450	\$750	377	19%	792	415
50 - 80%	\$30,000	\$47,000	\$750	\$1,175	530	27%	723	193
80 - 100%	\$47,000	\$59,000	\$1,175	\$1,475	173	9%	198	25
100 - 120%	\$59,000	\$71,000	\$1,475	\$1,775	94	5%	35	(58)
120% or Over	\$71,000		\$1,775	\$0	397	20%	13	(384)
Total					1,949		1,859	

Source: Figures based on American Community Survey 2009-2013 5-year average; BERK 2015. Figures may not add to total due to rounding.

Accounting for all the non-market factors that may reduce the rent a household pays, the gap analysis shows:

- There are approximately 378 renting households in Sumner with incomes under 30% of AMI. There is a gap in housing units affordable to this Housing Need category of 280 units.
- Sumner has more units with rents affordable to households with annual incomes of \$18,000 to \$30,000 than there are households earning those annual incomes (+415). Due to the gap in units available at the extremely low income level, it is likely that many households in the very low-income category (less than \$18,000 annual income) are renting in the \$450- \$750 monthly rent range. These households would be considered “rent burdened” because they are spending more than 30% of their income on rent.
- About 27% of Sumner’s renting households can afford rentals in the range of \$750 - \$1,175 per month. In this market bracket, there is a surplus of units (+193). These units are likely occupied by households with lower incomes and are rent burdened, as well as households in higher income brackets who are paying less than 30% of their income on rent. Households in the median income ranges (80 – 120% of AMI) are good candidates for entry-level homeownership housing.

Affordable Housing and Fair-Share Allocation

Pierce County’s Countywide Planning Policies also require that a jurisdiction indicate the demand for housing, establish the projections by type of units, and ensure that the projections are reflective of a jurisdiction’s fair share of countywide housing need.

According to 2012 Pierce County Planning policies, “it shall be the goal of each jurisdiction in Pierce County that a minimum of 25% of the growth population allocation is satisfied through affordable housing (AH-3.3).” Affordable housing is defined in the County Planning Policies as “shall mean the housing affordable to households earning up to 80 percent of the countywide median income” (Pierce County Planning Policies 2012).

Based on the Buildable Lands Report, Sumner’s estimated remaining housing allocation growth for the years 2010 to 2030 equals: 1,591.

The 25% goal applied to the 2030 growth allocation would mean 398 dwelling units planned for affordable levels; applied to the 2035 projected growth allocation would mean 454 dwelling units planned for affordable levels. This would be in addition to the need to assist those with a current cost burden – about 42% of current households.

East Sumner

Population

Using 2010 census block data for the East Sumner area, 17 blocks intersect within the East Sumner Neighborhood boundary. Within these census blocks, there is a total population of 2,066. The East Sumner population is also slightly more diverse than the city population as a whole. In East Sumner, 85.6% of the population identifies as white, compared to 87.3% of the population for the whole city.

Housing

According to 2010 Census block data, there are approximately 974 housing units in the East Sumner area. Of these units, 92% are occupied, and 8% are vacant. This is twice as high as the vacancy rates of the city as a whole (4.9% according to 2009-2013 American Community Survey 5-Year Estimates).

According to Pierce County parcel data, a majority of the land use among parcels in the East Sumner area is in single family residential land use. There is also a significant amount of vacant land within East Sumner, particularly the land east of 166th Ave E/ Sumner-Tapps Highway, which is currently a sand rock quarry.

Employment

According to 2011 Census data, East Sumner has a job density of 227-889 jobs per square mile (U.S. Census Bureau 2011). There is a significant concentration of workers in the “goods producing” industry class in East Sumner, particularly near the sand rock quarry. There is also a relative concentration of jobs in this area that earn more than \$3,333 per month.

Impacts

Impacts Common to All Alternatives

Population and employment would increase under all alternatives, though locations of growth would differ, as noted below. The ability of each alternative to accommodate the population and employment forecasts is described below by alternative. See Exhibit 3-53.

Exhibit 3-53. Growth Allocations and Alternative Capacity for Growth: City Limits

	2010	2035 Growth Target	2010-2035 Growth	Alternative 1 Growth Capacity	Diff Alt 1 2010-2035	Alternative 2 Growth Capacity	Diff Alt 2 2010-2035	Alternative 3 Growth Capacity	Diff Alt 3 2010-2035
Population	9,451	12,570	3,119	3,733	614	4,096	977	4,159	1,040
Housing	4,279	6,093	1,814	1,709	(105)	1,876	62	1,904	90
Employment	9,316	21,762	12,446	12,593	147	12,593	147	12,946	500

Source: PSRC 2014; BERK Consulting 2014

All alternatives would provide the same level of growth in the UGA. See Exhibit 3-54.

Exhibit 3-54. Growth Allocations and Alternative Capacity for Growth: UGA

	2010	2035	Net 2035
Population	1,112	3,394	2,282
Housing	509	1,554	1,045
Employment	68	346	278

Source: Pierce County 2014; BERK 2014

Secondary, indirect impacts of growth under each alternative would likely include potential encroachment near natural environmental resources and increases in demand for facilities and infrastructure. These secondary impacts are described in other sections of this document.

Impacts Specific to the No Action

Citywide

Alternative 1 can meet 2035 population and employment targets, but not housing targets. As described in Chapter 2, this alternative would result in surplus capacity for year 2030 population, housing, and jobs allocation.

The No Action Alternative would provide less population and housing than Alternative 2 and Alternative 3. In addition, the No Action Alternative would provide the same amount of jobs as Alternative 2 but fewer jobs than Alternative 3.

East Sumner

The East Sumner area is currently a mix of residential and commercial zoning. Residential uses are allowed in mixed use (NC, GC) and medium and low density residential zones. Current land use as of 2015 is mainly single family residential uses with commercial along SR 410 and a mining operation east of Sumner Tapps Highway. Under this alternative, there would not be any significant change to the existing zoning.

Land conversion to other uses consistent with existing zoning, infill development and platting of larger single family and vacant lots may occur. Additional multi-family housing consistent with existing zoning will likely occur. The redevelopment of older housing stock and other infill development may increase the cost of housing in the neighborhood and affect housing affordability.

Impacts Specific to the Minimal Zoning Action

Citywide

Alternative 2 can meet population, housing and employment estimates at 2035. This Alternative would result in a higher population and more housing units than the No Action Alternative, but the same amount of employees. It would result in a lower population, fewer housing units, and fewer employees than the Assertive Collaborative Action Alternative. This alternative would result in a land capacity of approximately 977 more people than the 2035 allocation of 12,570, and 62 more housing units than the 1,814 allocated for 2035. However, it also provides 147 more employees than needed to meet the 2035 employment allocation. This alternative would also meet 2030 Countywide Planning Policy targets which are lower than the 2035 estimates (see Chapter 2).

East Sumner

The East Sumner area is currently a mix of residential and commercial zoning. Residential uses are allowed in mixed use (UV, NC, and GC) and medium and low density residential zones. Under this alternative, most of the land would be re-zoned to Urban Village or General Commercial while maintaining the Urban Village land use designation, to provide additional housing densities and greater commercial development intensities. LDR would be retained and extended on the east and northern portions of the study area.

The upzoning of areas in the East Sumner Neighborhood could increase land values in the neighborhood and may increase the costs of development and eventually housing. Newer housing stock will provide an opportunity to increase energy efficiency, which is a stated goal in the City's Comprehensive Plan. The conversion of the existing housing stock to higher density residential development may increase the cost of housing and affect housing affordability by replacing older and more affordable housing choices. Increased density will also increase the variety of housing choices within the East Sumner Neighborhood.

Impacts Specific to the Assertive Collaborative Action

Citywide

Alternative 3 can meet population, housing and employment targets at 2035. This Alternative would result in a higher population and more housing units than the Alternative 1 No Action Alternative and the Alternative 2 Minimal Action Rezoning Alternative. It would also result in a higher number of employees than the other two alternatives. This alternative would result in a land capacity of approximately 1,040 more people than the 2035 allocation of 12,570, and 90 more housing units than the 6,093 allocated for 2035. It also provides 500 more employees than needed to meet the 2035 employment allocation of 21,762. This alternative would also meet 2030 Countywide Planning Policy targets which are lower than the 2035 estimates (see Chapter 2).

East Sumner

Alternative 3 involves the same rezoning proposal under Alternative 2, but includes significant public investments in infrastructure to facilitate mixed-use development in the district. Due to the investments in infrastructure more development and land conversions to higher intensity residential and commercial development is likely to occur. The infrastructure investments and rezoning together would increase land values in the neighborhood and may increase in the costs for development and ultimately the cost of residential and commercial space. Because the upzoning allows development at higher density and intensities the existing neighborhood character will change over time; newer housing may be more costly than present older housing stocks. Similar to Alternative 2, newer housing stock will provide an opportunity to increase energy efficiency. Mixed-use development with a more walkable connected street pattern will also provide an opportunity for greater proximity between jobs and housing resulting improved walkability and access to transit.

Mitigation

Incorporated Plan Features

- **Growth Targets:** The action alternatives would provide updated capacity estimates to the year 2035 and help the City meet its population, housing, and employment targets.
- **Action Alternatives** would update housing and economic development policies as described in Chapter 2.
- **Housing Element Policies**
 - **Policy 1.1:** Encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing, such as temporarily waiving permit fees, completing public works projects, etc.
 - **Policy 1.4:** In order to balance the protection of viable neighborhoods and the need to provide a range of housing to all life stages and economic segments, allow for some attached single-family units, small scale multi-family developments such as duplex and triplex, and accessory units in single-family neighborhoods.
 - **Objective 1.4.1:** Maintain Design Guidelines to ensure new multi-family is consistent with the character of the existing neighborhoods. Maintain design standards for neo-traditional single-family developments.
 - **Policy 2.1:** Strive to meet the City's fair share of housing needs by planning that 25% of the growth population allocation is satisfied through affordable housing.
- **Economic Development Policies**
 - **Policy 1.7:** Encourage industries, which are "clean" and do not degrade the natural and built environment in the community.

- **Policy 2.1:** Provide protection of natural amenities such as riparian corridors and vital open spaces for enjoyment by workers and to enhance the work and business environment.
- **Policy 2.10:** Coordinate economic development policies and activities with other Comprehensive Plan Elements.
- **Policy 2.11:** Monitor demographic trends to ensure City policies and direction correspond.
- **Objective 3.0:** Assure that adequate public facilities and public services are available to support industrial and commercial development.

Applicable Regulations and Commitments

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

Other Potential Mitigation Measures

The SEIS describes the current and future needs for affordable housing. Therefore additional mitigation measures are provided below.

- Since Sumner currently has housing affordable to all ranges, it is important that the existing housing stock is preserved to the greatest extent feasible.
- Alternative housing types, such as small-lot single-family, multifamily development, and senior housing will help to create a wider range of housing options.
- The City could coordinate with the Pierce County Housing Authority and local non-profit agencies that provide affordable and transitional housing in the Sumner area.
- State law allows cities to attract housing to urban centers that lack sufficient residential uses by offering a multifamily tax exemption (MFTE) (Revised Code of Washington 84.14. When a city defines residential target areas within an urban center, and allows for applications for the exemption, approved project sites are exempt from ad valorem property taxation for a period of 8 to 12 years. A greater number of exempt years is possible where a certain percentage of low-income housing is provided. The City could adopt MFTEs for market-rate and affordable dwellings in the Town Center to promote the compact development form in the area of the community that is well served by transit and a range of public services.
- The City could implement other funding and regulatory measures, such as; potential development of an inclusionary housing program; fast track permit processing; fee waivers; and reduction in development standards (e.g., density bonus, reduced parking requirements) for affordable housing. These implementation measures will require detailed review if, for example, development regulations are revised subsequent to this Comprehensive Plan update.
- The City could take further action to meet its affordable housing targets by providing affordable housing incentives and supporting affordable housing programs sponsored by Pierce County Housing Authority and/or other regional housing agencies.
- The City could provide materials for public use that describe federal non-profit housing programs such as the Federal Housing Administration's homebuyer programs, community development block grants, and Section 8 Housing Assistance Program can help Sumner residents with access to affordable housing.
- The City could provide information to citizens about State programs and general assistance for financially needy families, pregnant women, and unemployable persons can also help Sumner residents with access to affordable housing.
- The City could coordinate with nonprofit programs or provide information about location programs such as those administered by the Pierce County Housing Authority and partner non-profit agencies

such as Mi Casa, Helping Hand, and Phoenix Housing Network provide assistance at the local level to help Sumner residents with access to affordable housing.

Significant Unavoidable Adverse Impacts

Population, housing and employment would increase under the alternatives, although the location of residential and employment growth and the extent of that growth would vary by alternative. Additional population growth would increase the demand for housing. Additional population and employment growth would result in secondary impacts on the natural and built environment and on the demand for public services. These impacts are addressed in other sections of this document.

The number of housing units would increase under all alternatives to differing degrees. Additional population growth anticipated under all alternatives would increase the demand for housing and may impact housing affordability, which can be mitigated with affordable housing policies and incentives. The need for affordable housing would increase as well. Additional population and housing growth would result in secondary impacts on the natural and built environment and on the demand for public services. These impacts are addressed in other sections of this document.

3.8 Plans and Policies

Affected Environment

State Goals

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

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

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

VISION 2040

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

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

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

Countywide Planning Policies for Pierce County

In accordance with GMA, Pierce County and the cities and towns located in the County prepared Countywide Planning Policies (CPPs). CPPs are written policy statements establishing a "countywide" framework from which county and municipal comprehensive plans are developed and adopted. The framework is intended to ensure that the municipal and county comprehensive plans are consistent. The CPPs were amended several times including in 2004 to include an update to the designation of Urban Centers and Manufacturing/Industrial Centers (MIC), relevant to the northern Sumner valley which has been designated as a regional candidate MIC. A major update to CPPs also occurred in 2012. The CPPs address required topics outlined in the GMA as well as optional topics considered important to the region:

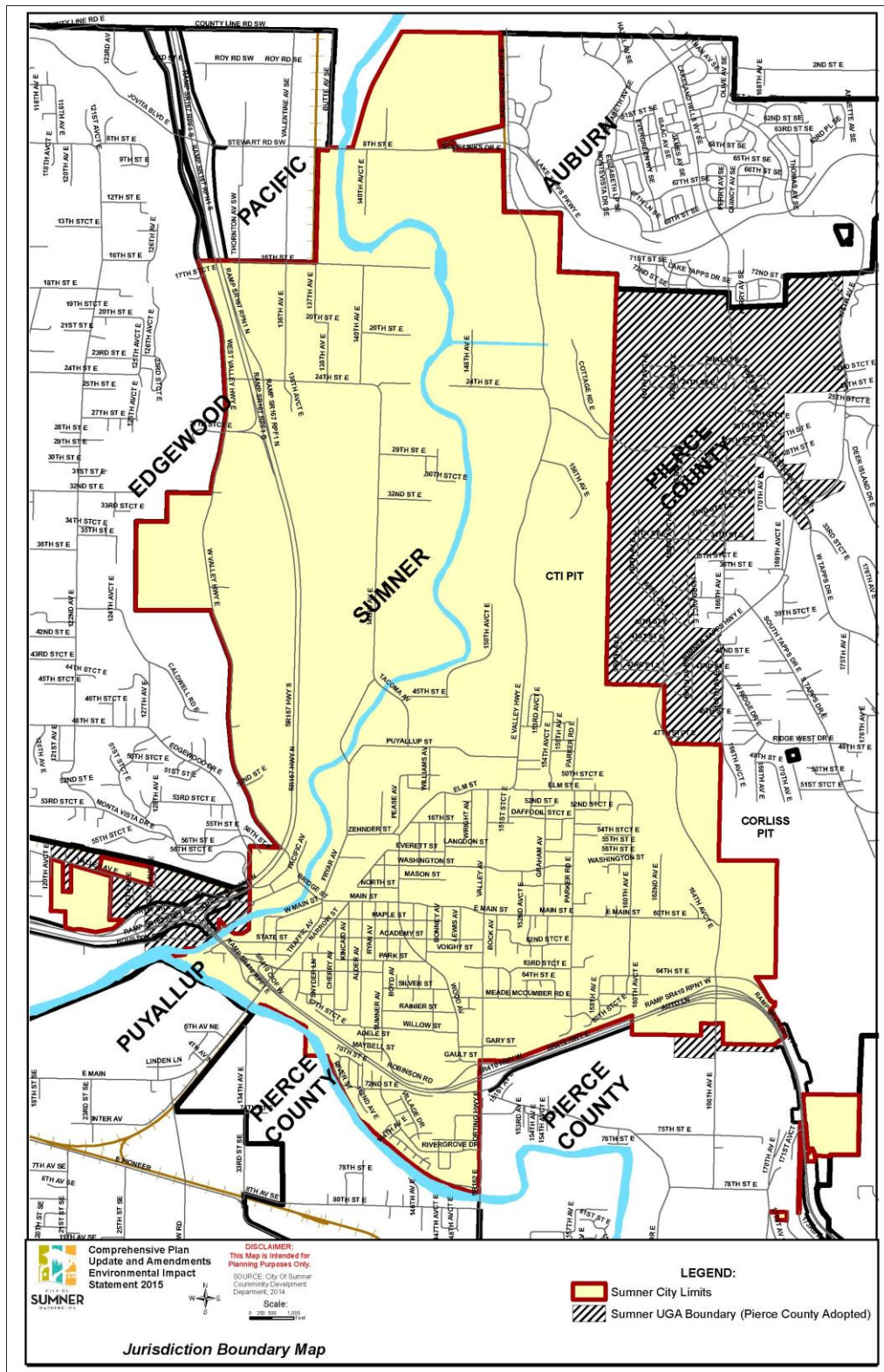
- Preamble to Countywide Planning Policies
- Affordable Housing
- Agricultural Lands
- Amendments and Transition
- Buildable Lands
- Community and Urban Design
- Economic Development and Employment
- Education
- Fiscal Impact
- Health and Well-being
- Historic, Archaeological and Cultural Preservation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

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

Adjacent Jurisdictions' Plans

This section analyzes the land use plans of adjacent jurisdictions. Exhibit 3-55 depicts the location of these jurisdictions relative to Sumner.

Exhibit 3-55. Jurisdictional Boundaries



Source: City of Sumner 2015

City of Auburn

The City of Auburn borders Sumner to the northeast and takes in Lakeland Hills, a large planned unit development that contains residential and commercial areas. Auburn has a population of about 74,860 based on the 2013 American Community Survey from the US Census (ACS, 2013). Lakeland Hills land uses are compatible with those planned in the Sumner UGA, which is predominately single-family residential. Traffic increases associated with the City of Auburn have resulted from the recently completed Lake Tapps Parkway that brings traffic from SR 167, across the valley floor via Stewart Road (formerly 8th Street) and through Sumner.

Growth and development within the City of Auburn would have the following effects on the Sumner current plan area:

- Increased traffic on the Lake Tapps Parkway via Stewart Road to SR 167.
- Commuters from southeast Auburn using the Sumner Commuter rail station rather than the Auburn station, increasing demand for commuter parking at the station.
- Coordination of stormwater management infrastructure needs for development within the City of Auburn that drains to the White (Stuck) River within the City of Sumner.

City of Bonney Lake

The City of Bonney Lake lies to the east of Sumner on the Elhi Hill and is accessed via SR 410. The population of the City of Bonney Lake is estimated at 18,289 according to the 2013 American Community Survey population estimates from the US Census (ACS, 2013). Bonney Lake is rapidly growing and is estimated to have a population of 23,455 by 2030, representing an increase of 28% over the existing population (US Census, 2010; Pierce County, 2014). The two cities share a border that is predominately single-family residential.

Growth and development in Bonney Lake would have the following effects on the Sumner current plan area:

- The City of Bonney Lake is part owner of the Sumner wastewater treatment plant and thus growth in Bonney Lake will share in the demand for waste water treatment.
- Growth in Bonney Lake increases traffic in and through the Sumner from SR 410.
- Bonney Lake provides water service within parts of the Sumner UGA at a higher elevation than the City's water tanks.
- Continued hillside development in Bonney Lake will impact views from Sumner of Mt. Rainier and surrounding rural/undeveloped areas.
- Commuters living in the City of Bonney Lake access the Sumner commuter rail station via transit or driving to the station. Parking at the station continues to be an impact and greater population in Bonney Lake will lead to more commuters using the station.
- Bonney Lake and the City of Sumner are both served in part by the Sumner School District and increased development in Bonney Lake may impact school capacity.

City of Edgewood

The City of Edgewood is located to the west of Sumner bordering generally along the West Valley Highway. The City of Edgewood population is estimated at 9,591 according to the 2013 American Community Survey from the US Census (ACS, 2013). The City is estimated to grow to a population of 15,955 by 2030 (US Census, 2010; Pierce County, 2014). The land use and zoning that is adjacent to Sumner is mostly residential with a small commercial area in the north portion of the city adjacent to Sumner. In most instances the zoning is compatible with light manufacturing found in Sumner because the West Valley Highway forms a separation between these uses as does the steep slopes between the

light manufacturing area in Sumner and most of the residential on the hill. Growth and development in the City of Edgewood may have the following effects on the City of Sumner:

- Increased development on the south and eastern sections of the City would increase traffic congestion in and through Sumner at Valley Avenue East, West Valley Highway, and Traffic Avenue. This is the most efficient route to major freeways in the area.
- Increased development and population would increase demand for parking at the Sumner commuter rail station.
- Increased development would cause aesthetic impacts if development is allowed on the hillsides.
- Increased development results in a need to coordinate sewer and water service to areas on the valley floor and west of the West Valley Hwy, especially in light of any new commercial zoning and development.
- The City of Edgewood and the City of Sumner are both served in part by the Sumner School District and increased development in Edgewood may impact school capacity.

City of Pacific

The City of Pacific is located along the northern border of Sumner and the population is estimated at 7,034 according to the 2013 American Community Survey (ACS, 2013). The population is expected to grow to 7,427 by the year 2031 (US Census 2010, King County 2014). The City is split between King and Pierce County. Portions of the city limits within Pierce County and adjacent to Sumner are zoned industrial and commercial and no future population growth is planned. All future population growth will occur in King County. The industrial/commercial land uses and zoning in the City of Pacific borders light manufacturing that is in the Sumner current plan area. The City of Pacific and City of Sumner share the Sumner-Pacific MIC designation, which has been designated as a regional manufacturing and industrial center in the CPPs.

The following issues may affect the Sumner current plan area as growth continues:

- Coordination is important between the two cities on planning and development of Stewart Road (formerly 8th Street East) particularly improving/replacing the bridge on the White River.
- Coordination of connections to non-motorized regional trail plans.
- Coordination of compatible development and standards along 136th Avenue (Valentine).
- Coordination of sewer and water service to the area.
- The City of Pacific and the City of Sumner are both served by the Sumner and Dieringer School Districts and increased development in Bonney Lake may impact school capacity.

City of Puyallup

The City of Puyallup is located to the south and west of Sumner across the Puyallup River. The city population is estimated at 38,609 according to the 2013 American Community Survey (ACS, 2013). The City is estimated to grow to 57,671 by 2030 (US Census, 2010; Pierce County 2014). Land uses along and adjacent to the City of Sumner include commercial, multifamily and single-family residential, which are compatible with commercial uses in Sumner due to the separation of the uses by the Puyallup River. The City's wastewater treatment plant is northeast across the Puyallup River from Puyallup.

Key areas of impact and coordination with Sumner are as follows:

- Coordination of transportation access from development near, which will significantly increase traffic in and through Sumner, especially impacts to the SR 410/Traffic Avenue interchange.
- Coordination of regional trail system particularly a connecting route from the Puyallup River Bridge on East Main Street to the Foothills Trailhead on 80th Street East.

- Coordination of flood control and flood management projects including setback levees.

Sumner: The Vision

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

Key ideas in the Vision Statement include:

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

The Vision Statement is under review with the 2015 Comprehensive Plan Update.

City of Sumner Comprehensive Plan

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

The Comprehensive Plan includes the following elements consistent with GMA:

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

- Environment
- Housing
- Transportation
- Capital Facilities and Public Services
- Utilities
- Family and Human Services
- Shoreline

Sumner Zoning Code

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

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

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

Shoreline Master Program

The *Sumner Shoreline Master Program* was updated by the City in December 2014 and approved by the Washington State Department of Ecology (Ecology) on December 12, 2014. The SMP became effective on December 26, 2014. Its purpose is to protect the shorelines within 200 feet of the White (Stuck) and Puyallup Rivers, protect fish and wildlife habitat, and increase public access

The *Shoreline Master Program* includes three shoreline designations:

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

The plan includes policies and development standards for each category (City of Sumner 2003).

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

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

The plan includes policies and development standards for each category (City of Sumner 2014).

Impacts

This section studies the effects of either maintaining the current Comprehensive Plan and development regulations (No Action) or amendment of the plans and regulations to address land use, transportation, environment and other topics.

Growth Management Act

Each alternative is weighed in relation to the GMA goals in the following Exhibit 3-56. As noted in the Washington State Administrative Code, each jurisdiction is to harmonize the goals, and differences in emphasis are expected:

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

Exhibit 3-56. Growth Management Act Goals and Alternative Evaluation

GMA Goal	Legend:			Discussion
	Alternative 1 No Action	Alternative 2 Minimum Change	Alternative 3 Assertive Collective Action	
Guide growth in urban areas	✓	✓	✓	All alternatives would allow for growth in an urban growth area.
Reduce sprawl	✓	✓	✓	All alternatives would allow for urban level employment and residential uses in city limits.
Encourage an efficient multimodal transportation system	✓	+	+	All alternatives would support the land use plan with multimodal transportation changes. Alternatives 2 makes improvements to East Main Street and Alternative 3 would improve the road system in Easter Sumner, particularly Alternative 3, resulting in enhanced safety at intersections and greater connectivity. Alternatives 2 and 3 update concurrency and impact fees.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION**

GMA Goal	<p>Legend: ✓ = generally meets; + = greater emphasis; ○ = partially meets; N/A = not applicable; TBD = to be determined</p>			Discussion
	Alternative 1 No Action	Alternative 2 Minimum Change	Alternative 3 Assertive Collective Action	
Encourage a variety of housing types including affordable housing	○	+	+	Alternative 1 would not meet housing target estimates in 2035. It would maintain present policies and zoning. Alternatives 2 and 3 would implement greater housing variety, particularly in East Sumner. Barriers to housing variety would be removed in the Town Center. Alternative 3 would remove MDR zoning along East Valley Highway but this would be offset by increases in housing in the Town Center and East Sumner.
Promote economic development	✓	+	+	All alternatives provide for employment growth. Alternatives 2 and 3 would apply the Manufacturing Industrial Center (MIC) to the Sumner Meadows and Fleishmann sites.
Recognize property rights	✓	✓	✓	Under all alternatives, all properties are zoned to allow for reasonable use of property.
Ensure timely and fair permit procedures	N/A	N/A	N/A	The Alternatives do not affect development regulations that address permit procedures.
Protect agricultural, forest, and mineral lands	✓	✓	✓	Alternatives 2 and 3 would amend City planning maps to remove the Agricultural Resource Land Map designation. The conversion of the agricultural land north of Stewart Road, and in residential areas along Valley Avenue or along the edge of the East Hill would reduce the use in the city. While the resource designation would be removed from the Sumner AG zoned property, protective zoning would continue in the form of the Residential Protection zone, and the property would be subject to the federal biological opinion that limits impervious areas. Collectively, 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. See Appendix D which reviews classification criteria.
Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat	✓	✓	✓	Alternative 1 retains land in public ownership along the White River, particularly the City-owned property south of Sumner Meadows. Alternatives 2 and 3 would similarly retain public land, improve critical area regulations allow for offsite wetland mitigation from East Sumner to other potential bank sites such as the City's AG zoned property or Salmon Creek.
Protect the environment, including air and water quality	✓	+	+	All alternatives would be subject to City critical area and stormwater regulations including low impact development requirements. Alternatives 2 and 3 would establish a zero rise floodplain policy, and include climate change policies.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION**

GMA Goal	Legend:			Discussion
	Alternative 1 No Action	Alternative 2 Minimum Change	Alternative 3 Assertive Collective Action	
Ensure adequate public facilities and services	✓	✓	✓	All alternatives increase the demand for public facilities and services. All would require mitigation measures to ensure adequate facilities and services per Public Services and Utilities sections of this SEIS.
Encourage historic preservation	✓	✓	✓	All alternatives would be subject to Comprehensive Plan policies and federal and state laws that promote the protection and preservation of historic and cultural features. Alternatives 2 and 3 propose minor policy modifications to promote local historic character such as through murals.
Foster citizen participation	✓	✓	✓	All alternatives are undergoing public review as part of the SEPA process. Chapter 2 describes the public participation efforts to date.

Source: BERK Consulting, 2014.

Multicounty Planning Policies

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

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

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

Environment: The region will care for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, reducing greenhouse gas emissions and air pollutants, and addressing potential climate change impacts. The region acknowledges that the health of all residents is connected to the health of the environment. Planning at all levels should consider the impacts of land use, development patterns, and transportation on the ecosystem.

Discussion: All alternatives would be required to comply with the City's critical area and shoreline regulations. All alternatives would contribute to greenhouse gas emissions but are similar to one another and do not exceed SEIS thresholds. This SEIS addresses the impacts of land use, development patterns, and transportation and provides mitigation measures to reduce impacts.

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

Discussion: All alternatives focus growth in the city limits. Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed-use developments as proposed under Alternatives 2 and 3 could reduce trips internally in East Sumner as well as in the Town Center where housing in proximity to commercial and transit use.

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

Discussion: Alternatives 2 and 3 in particular update the Housing Element and propose measures to increase housing variety in East Sumner through changes to zoning as well as through condominium and parking changes in the Town Center. Alternative 3 would remove MDR zoning along East Valley Highway but this would be offset by increases in housing in the Town Center and East Sumner.

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

Discussion: All alternatives provide for employment growth. Alternatives 2 and 3 consider trends towards a more dense mix of jobs in the future, and both would expand the MIC overlay to Sumner Meadows and Fleishmann properties.

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

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

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

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

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

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

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

Discussion: All alternatives would add traffic to the road system, but would be required to meet City concurrency standards. The traffic model tests the City's planned improvements in its Comprehensive Plan and TIP. Alternatives 2 and 3 would update the Transportation Element including concurrency and impact fee regulations.

Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed use developments could reduce trips internally such as under Alternatives 2 and 3 that promote additional mixed use opportunities in East Sumner and Town Center.

Environmental Health. A key focus of the plan is to protect and improve the region's environmental health. This includes ensuring that the region has healthy air that meets all standards, ensuring that transportation projects improve the handling of stormwater runoff to protect Puget Sound and other surface waters, and addressing emerging issues such as transportation's role in reducing

greenhouse gas emissions and adapting to climate change. The plan includes a specific strategy to address state greenhouse gas goals and VMT reduction benchmarks. The four-part strategy includes Land Use, Transportation Pricing, Transportation Choices, and Technology. In addition, the plan builds on current efforts to protect natural areas and support vibrant, livable communities.

Discussion: All alternatives would contribute to greenhouse gas emissions though results are similar to one another and would not exceed thresholds established in the SEIS. All alternatives would be subject to City critical area and stormwater regulations including low impact development requirements. Alternatives 2 and 3 would establish a zero rise floodplain policy, and include climate change policies.

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

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

Countywide Planning Policies

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

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

Discussion: Alternative 1 would not meet housing estimates in 2035. It would maintain present policies and zoning. Alternatives 2 and 3 would implement greater housing variety, particularly in East Sumner. Barriers to housing variety would be removed in the Town Center. Alternative 3 would remove MDR zoning along East Valley Highway but this would be offset by increases in housing in the Town Center and East Sumner.

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

Discussion: Alternatives 2 and 3 would amend City planning maps to remove the Agricultural Resource Land Map designation. The conversion of the agricultural land north of Stewart Road, and in residential areas along Valley Avenue or along the edge of the East Hill would reduce the use in the city. While the designation would be removed from the Sumner AG zoned property, protective zoning in the form of the Residential Protection zone would continue, and the property would be subject to the federal biological opinion that limits impervious areas. Collectively, 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. See Appendix D which reviews classification criteria.

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

Discussion: These policies do not apply to the Alternatives.

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

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

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

Discussion: All alternatives focus growth in the city limits. Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed-use developments could reduce trips internally such as under Alternatives 2 and 3 that would update plans and regulations for East Sumner and the Town Center.

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

Discussion: All alternatives provide for employment growth. All alternatives meet employment targets. Alternatives 2 and 3 would apply the MIC to the Sumner Meadows and Fleishmann sites.

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

Discussion: All Alternatives allow for growth and would generate students; see the public services analysis in section 3.10 of this SEIS. Alternatives 2 and 3 update the Capital Facility Plan and integrate school district capital plans.

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

Discussion: The City has not conducted a fiscal analysis. Private or public development under any studied alternative will be required to meet City standards for public facilities and services.

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

Discussion: Alternatives 2 and 3 would update policies to promote health and activity.

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

Discussion: All alternatives would be subject to Comprehensive Plan policies and federal and state laws that promote the protection and preservation of historic and cultural features. Alternatives 2 and 3 propose minor policy modifications to promote local historic character such as through murals.

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

Discussion: See Agriculture. All alternatives would contribute to greenhouse gas emissions though results are similar to one another and would not exceed SEIS thresholds. All alternatives would be subject to City critical area and stormwater

regulations including low impact development requirements. Alternatives 2 and 3 would establish a zero rise floodplain policy, and include climate change policies.

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

Discussion: All alternatives address land in the city limits and do not alter UGA boundaries. This policy is not applicable.

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

Discussion: Alternatives 2 and 3 include Title 18 amendments to address the siting of essential public facilities.

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

Discussion: All alternatives would add traffic to the road system, but would be required to meet City concurrency standards. The traffic model tests the City's planned improvements in its Comprehensive Plan and TIP. See also Community and Urban Design. Alternatives 2 and 3 would update the Transportation Element including concurrency and impact fee regulations.

Employment development of greater than 100 employees would be subject to commute trip reduction requirements. Mixed use developments could reduce trips internally such as under Alternatives 2 and 3 that promote additional mixed use opportunities in East Sumner and Town Center.

Urban Growth Areas, Orderly Development, and Provision of Urban Services: Encouragement of development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner, reduction of sprawl and the provision of adequate public facilities and services necessary to support urban development at the time the development is available for occupancy and use; designate an "urban growth area" (UGA) or areas within which urban growth shall be encouraged and outside of which growth shall occur only if it is not "urban" in character; establish growth targets consistent with the requirements of the Growth Management Act; Centers will become focal points for growth within the county's UGA and will be areas where public investment is directed. Each community is to provide sufficient land capacity to achieve the growth targets.

Per Ordinance 2011-36s, net growth allocations to the city limits for the 2008-2030 period are: Population 2,910; housing: 1,770; and employment: 9,307. Buildable Lands Report results update the remaining growth targets to the 2010-2030 period: Population 2,519; housing: 1,464; and employment: 10,283. If carrying these estimates forward to 2035 in a straight-line method, the net figures would equal 3,119 population, 1,814 dwellings and 12,446 jobs.

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

The City has applied the Pierce County buildable lands results for the City with adjustments reflecting the recent Sumner Meadows areawide rezone that reduced housing capacity, and removed housing capacity from the City-owned AG properties, and other similar adjustments. The City has also calculated the results of capacity due to the proposed zoning changes in East Sumner and the potential to better achieve the Town Center Plan through adjustments to height and condominium restrictions.

Results are presented in Exhibit 3-57 and show:

- All alternatives meet 2030 growth targets in the Countywide Planning Policies.
- Alternative 1 can meet 2035 population and employment targets but not 2035 housing targets.

- Alternatives 2 and 3 meet all population, housing, and employment targets with Alternative 3 having the greater cushion of capacity.

Exhibit 3-57. Base Year, Growth Targets, and Land Capacity

a. Base Year and Growth Targets: City

	2010	2030	2035	Net 2030	Net 2035
Population	9,451	11,970	12,570	2,519	3,119
Housing	4,279	5,743	6,093	1,464	1,814
Employment	9,316	19,599	21,762	10,283	12,446

b. No Action Land Capacity

	2010	2030	2035	Net 2035	Alternative 1	Diff Alt 1 2010-2035
Population	9,451	11,970	12,570	3,119	3,733	614
Housing	4,279	5,743	6,093	1,814	1,709	(105)
Employment	9,316	19,599	21,762	12,446	12,593	147

c. Action Alternative 2 Capacity

	2010	2030	2035	Net 2035	Alternative 2	Diff Alt 2 2010-2035
Population	9,451	11,970	12,570	3,119	4,096	977
Housing	4,279	5,743	6,093	1,814	1,876	62
Employment	9,316	19,599	21,762	12,446	12,593	147

d. Action Alternative 3 Capacity

	2010	2030	2035	Net 2035	Alternative 3	Dif Alt 3 2010- 2035
Population	9,451	11,970	12,570	3,119	4,159	1,040
Housing	4,279	5,743	6,093	1,814	1,904	90
Employment	9,316	19,599	21,762	12,446	12,946	500

e. Urban Growth Area Capacity: All Alternatives

	2010	2030	2035	Net 2030	Net 2035
Population	1,112	2,020	3,394	908	2,282
Housing	509	925	1,554	416	1,045
Employment	68	144	346	76	278

Adjacent City Plans

None of the three alternatives would result in significant impacts to adjacent city plans. The City of Sumner is not proposing significant amendments to existing land use and zoning designations along the borders with adjacent communities.

Generally, very little conflict exists between planned land uses in the current plan area and surrounding jurisdictions. Land uses in the cities of Auburn, Bonney Lake, Pacific, and Puyallup are compatible with adjacent uses in the current plan area. Compatibility with unincorporated Pierce County is addressed below under impacts specific to each alternative.

Although residential uses, and in some cases future land use designations, in the City of Edgewood abut industrial and commercial designations along the western city limits, a steep hillside provides a natural buffer for the most part; in some areas of Sumner, future industrial development could produce noise but the City could apply SMC Chapter 8.14 Noise Control. In the remaining area where residential uses in Edgewood directly abut Sumner's commercial and industrial designations at the bottom of the hill (roughly between 20th Street East and 32nd Street East), the City of Edgewood has designated this area as commercial, and therefore, uses can be expected to transition from residential to more compatible commercial uses in the future.

Sumner Vision and Comprehensive Plan Elements

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

- In 2024, Sumner shows strongly its unique "small town" characteristics and appeal even in the face of a changing world. Today, Sumner is bound together by its community pride, respect for neighbors, agricultural and small town heritage, and support for small businesses as well as industry, and concern for the environment. We recognize that there are community needs -- the improvement of the Downtown business area, repair of streets and sidewalks, management of traffic, along with adequate public services and parks. Our vision for the coming decades enhances our positive community ties, quality of life, and addresses community needs.

Discussion: The Vision would be implemented by focusing growth in the city limits and promoting a gridded, walkable mixed use character such as in the Town Center and East Main Street. Infrastructure and services would support growth through an updated Capital Facilities Plan. While Alternatives 2 and 3 would remove the Agriculture Resource designation map, none of the sites mapped are considered lands of long-term commercial significance. The City is still retaining a large property in protective zoning (Residential Protection would be applied to the current AG zoned property).

Land Use Element/Plan: The Comprehensive Plan includes a Land Use Map and text describing the use of land. Alternative 1 would keep all land use designations and overlays as is. The following categories may be amended as part of the Action Alternatives.

- **Medium Density Residential (MDR):** The medium density designation is intended to provide for multi-family living to ensure that opportunities to obtain reasonable-cost housing exist for community residents. Primary uses include multi-family housing of various types including zero-lot line structures, townhouses, condominiums, etc. Secondary uses can include single-family dwellings, adult family homes, day care, public and private educational facilities, utilities subject to compatibility criteria, churches and religious institutions, convalescent care and rest homes, limited office/professional buildings, and manufactured home subdivisions. Medium density developments may require design review to ensure diversity of building types/avoidance of building form repetition, plan goal consistency, and neighborhood compatibility.

Discussion: Alternative 3 includes amending the comprehensive plan land use designation and zoning from MDR to Light Manufacturing (M-1) for property along the East Valley Highway. The MDR designation is maintained under Alternative 2 to provide sufficient capacity to accommodate growth targets for housing. Sufficient capacity for residential development exists under all the alternatives with the exception of Alternative 1, which lacks sufficient housing capacity.

- **Neighborhood Commercial (NC):** This designation is intended to provide for neighborhood centers that include convenient retailing, small offices, and other commercial activities principally oriented to adjacent residential areas and neighborhoods. Primary uses include convenience stores, personal service shops, day care, dry cleaners, Laundromats, video stores, and others deemed to be neighborhood serving. Secondary uses include public/quasi-public uses such as parks and other similar facilities as well as utilities subject to compatibility criteria. Higher density residential developments may also be allowed in the neighborhood commercial areas where integrated appropriately with the commercial uses and surrounding neighborhood.

Discussion: A small parcel at 1418 Wood Avenue is proposed to change from NC to Light Manufacturing (M-1). Due to the small size of the property and lack of proximity to other NC areas the property may not be viable for land uses allowed under the NC district. The M-1 designation is consistent with nearby properties designated for industrial use.

- **Light Industrial:** Principle uses include light manufacturing (particularly assembling and manufacturing of products from previously prepared material), office, warehouse/distribution, and packaging plants. Secondary uses include service retail, restaurant, government, agricultural activities, and utilities subject to compatibility criteria.

Discussion: The property at 1418 Wood Avenue will be designated from NC to M-1 thereby expanding the land base for industrial development in the city. The designation to M-1 is appropriate given adjacent industrial lands and lack of demand for NC uses in that area of the city.

- **Public Private Utility Facility:** Public and Private Utility Facilities are designated on the existing comprehensive plan land use map. The zoning for these sites varies with many designated for low-density residential use.

Discussion: Where such facilities are surplus and no longer being used for utility purposes the city will update the existing land use map for the comprehensive plan. The Cascade Water Alliance has surplus some properties and made them available for sale. These properties are in the UGA and would be designated as LDR.

- **Design Districts:** The Design District designations establish areas where design review is important due to the surrounding neighborhood context.

Discussion: The proposal includes the elimination of the design district designations. Design review will still be required for certain types of developments and actions as outlined in the City of Sumner Zoning Code. The present Design District designation on the Comprehensive Plan does not have a regulatory purpose and presents an interpretation challenge as it was developed before the City's design codes and is no longer relevant.

- **PMUD:** The Planned Mixed Use Development overlay area requires a mix of commercial and residential development that will undergo extensive public process including design review, hearing examiner recommendation, and City Council approval. The PMUD offers greater flexibility to develop a mix of ground floor commercial, walkable neighborhoods, increased density as appropriate, adequate open space, complete street designs and opportunities for green and environmentally friendly development. The result is a development that fits the character of the surrounding neighborhood as a whole and is an asset to the community. A PMUD may have a mix of commercial, mixed use structures, and stand-alone multi-family residential in a variety of configurations from live/work units, residential over ground floor commercial, to townhouses, and cottages. Buffer areas can also be configured within a PMUD to minimize conflicts between uses such as agriculture and large-lot single-family or, between more intense uses such as industrial, depending on the neighborhood.

Discussion: The Fleischmann's property will be removed from the PMUD and added to the Manufacturing/Industrial Center (MIC). The Fleischman property has historically been used for industrial and manufacturing purposes and its base zone allows heavy industrial uses. The City has sufficient capacity to accommodate population and housing targets without mixed-use development occurring on the Fleischmann's Property.

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

Discussion: The Fleischman Property and the former Sumner Golf Course will be added to the MIC. The golf course has been planned for industrial development and is a key site for future employment growth in the city. The addition of these properties to the MIC will facilitate further development and job creation at these sites consistent with the goals of the comprehensive plan.

Historic and Cultural Resources Sub-Element: The Historic and Cultural Resources Sub-Element identifies goals, policies and objectives to preserve and enhance the historic and prehistoric cultural resources of Sumner, to enhance and improve the cultural arts environment and recognize the heart and historic meaning of downtown.

Discussion: The proposal includes additional language in support of maintaining the Sumner Historic District.

Essential Public Capital Facilities Sub-Element: The Essential Public Capital Facilities Sub-Element allows for the appropriate siting of essential public capital facilities of a state-wide or countywide nature in compliance with the requirements of the Growth Management Act.

Discussion: All three alternatives maintain the existing policies and procedures for the siting of essential public capital facilities. The siting of essential public capital facilities are not significantly impacted by any of the studied alternatives.

Commuter Rail/Regional Transit Sub-Element: The Comprehensive Plan includes a Commuter Rail/Regional Transit Sub-Element promoting the Sounder Station in the Town Center.

Discussion: All three alternatives maintain the existing policies regarding commuter rail and regional transit. Increasing housing opportunities in the downtown by removing the condominium provision will support the development of housing in the downtown area and proximity to the commuter train.

Permit Process, Plan Monitoring and Amendment, and Governance Sub-Elements: These sub elements ensure efficiency, timeliness and fairness in the permitting, plan update and other government processes.

Discussion: The two action alternatives include new policies related to Spanish speaking population and the goal of the city to be a leader in bi-lingual publications and similar outreach methods.

Economic Development Element: The Economic Development Element focuses on creating and maintaining a strong and diverse economy, providing necessary infrastructure and protecting against the proximity of incompatible land uses. The element emphasizes the importance of the existing and planned manufacturing and industrial economy in the City.

Discussion: The two action alternatives include provisions to strengthen the manufacturing and industrial base in the city by adding additional properties in the MIC overlay and converting additional lands to Industrial (M-1) zoning along East Valley Highway (Alternative 3 only). Amendments to the Economic Development Sub-Element include several goals and policies to strengthen the local economy including, increasing manufacturing jobs, promoting tourism and branding the city for business promotion.

Community Character Element: The Community Character Element emphasizes maintaining Sumner's high quality of life and friendly small town atmosphere. The city should be designed so that housing, jobs, daily needs and other activities are within easy walking distance of each other through planning for urban villages and reinforcing the downtown as the town center, commercial and cultural center of the City.

Discussion: The two action alternatives include public improvements and zoning changes to support development of the East Sumner Neighborhood Urban Village in conformance with the Community Character Element. The third alternative, which includes the most significant public improvements to support development in East Sumner will advance the goal of the community character element to support urban villages where housing, jobs, and daily needs are in close proximity and accessible by walking.

Parks and Open Space Element: The Parks and Open Space Element establishes the provision and maintenance of a safe, attractive, enjoyable and diverse park system as a goal for the City. The preservation of significant open space, including urban forest and agricultural lands, is also a goal. The city has established a goal of maintaining 35% of the land in the city as open space.

Discussion: The two action alternatives include several policy amendments to the Parks and Open Space Element including support for small gathering places downtown, a dog park, a nature center, an obstacle course and a spray park. Other considerations will be opportunities for connecting the community to the rivers, clarification of the 35% open space policy, a significant tree ordinance or policy and a policy regarding updating the functional plan in 2015-16. These policies will strengthen the Parks and Open Space Element in terms of better defining specific types of open space amenities that should be developed or preserved. Alternative 3 includes the development of a new park and open space amenities in East Sumner that will further support development of the area as an urban village.

Environmental Element: The Environmental Element emphasizes the importance of protecting, enhancing and promoting the natural environment in and around the City. Protecting natural resource lands for agricultural and mining use, maintaining water quality, maintaining water quality, protecting groundwater, and protecting critical plant and wildlife species are goals of this element. The protection of people and properties from natural disasters is also important.

Discussion: The two action alternatives include several new policies for the Environmental Element including strengthening the flood damage prevention policy, establishing a zero rise policy to prevent flooding, a policy on climate change, policies to protect raptors, conducting a "best available science" review of Critical Area Regulations, and referencing the Ecology stormwater manual. Alternative 3 is consistent with the Environmental Element by mitigating for wetland impacts associated with the development of the East Sumner Neighborhood and providing open space habitat as part of the open space improvements.

Housing: The Housing Element establishes several goals for the city including maintaining the existing housing stock and residential neighborhoods, encouraging diverse housing options, support for affordable housing, and providing a variety of housing types and densities in the town center and close to the train station.

Discussion: The two action alternatives will result in the redevelopment of existing housing, but the East Sumner Neighborhood Plan is supported by the other comprehensive plan elements. The development of new and diverse housing choices in East Sumner will provide greater opportunities for walking to jobs, services and open space areas consistent with the goals of the comprehensive plan. Increasing the allowable building heights and removing the requirement for condominium ownership in the downtown is consistent with the comprehensive plan goal to provide higher density and diverse housing choices in the downtown. Amendments to the housing element will provide further support for manufactured housing, senior housing and further support housing affordability.

Transportation Element: The Transportation Element supports an efficient and safe multimodal transportation system for residents, employees and visitors to the City while maintaining small town quality of life and economic vitality. Public involvement and education are key strategies in this element to support implementation of transportation projects and programs in the City. Support for a highly interconnected network of streets, sidewalks, bicycle lanes and trails are also included. The City further promotes alternative transportation modes by providing adequate facilities for biking and walking.

Discussion: The two action alternatives include several updates to the Transportation Element including updated traffic modeling and forecasts, a new policy related to transit, promoting healthy living through design, support for connections to the hills, a policy to update the trail plan, policies to allow electric vehicle charging stations and requirements for concurrency per GMA. The two action alternatives support development of the East Sumner Neighborhood Urban Village, which furthers many of the goals in the transportation element such as providing an interconnected transportation network that supports multimodal use. Alternative 3 includes new street improvements and improvements to Main Street consistent with the goals and policies of the transportation element.

Capital Facilities and Public Services: The Capital Facilities and Public Services Element supports the provision of effective, efficient and quality capital facilities and public services necessary for a growing community. The element establishes level of service standards for each type of capital facility to assist in the planning for new growth and to maintain adequate service for existing development. The element supports green development practices in all buildings to be constructed, remodeled or renovated by the city.

Discussion: Alternative 3 includes major investments in public infrastructure to support development of the East Sumner Neighborhood including new streets, off-site wetland mitigation and open space and trail amenities. These investments meet the goals of the Capital Facilities and Public Services to support a growing community. Proposed policy amendments to the element include those related to capital budget decisions, updating the capital facilities plan, clarifying policies related to the GMA requirement to reassess the land use element if funding for capital facilities is insufficient, and to review policies regarding impact fees.

Utilities Element: The Utilities Element supports development of natural gas utilities to support growth in the City. The element further supports regional and local improvements to electric facilities and to coordinate service plans for facility development. Adequate telephone services and high speed technology are also goals for the community.

Discussion: The Utilities element is being updated based on input from utility providers to see what future plans there are and how they reflect any changes from the 2010 Comprehensive Plan Update.

Family and Human Services: The Family and Human Services Element is an optional element under GMA. The element policies include support for cost-effective human services to meet community needs. The city's approach supports human service programs that focus on prevention, education and families. Intervention and treatment through education and counseling services for a variety of issues are also supported.

Discussion: The proposal includes new policies in the Family and Human Services Element including support for a grocery store downtown, a policy to prevent the exclusion of medical clinics and promote affordable medical care, a policy referencing other programs and direction them to other agencies, support for family friendly events, and healthy living policies as proposed by the health department.

Sumner Shoreline Master Program: The amended SMP (2014) would be integrated as an Element of the Sumner Comprehensive Plan under Alternatives 2 and 3; it would remain a related but separate document with Alternative 1 and consistency amendments in the Comprehensive Plan would not be made.

Discussion: All alternatives would be subject to the use standards and shoreline development regulations in the SMP.

Town Center Plan

Vision, Goals and Policies: The Town Center Plan establishes the following vision:

- Sumner, a city of excellence reinforcing its role as classic, small town Americana that goes beyond nostalgia, and
- Sumner, a community that retains/strengthens a fully functional, “everyday” downtown

The plan establishes policies to support economic development, job growth, housing development, and creating an enjoyable and identifiable downtown atmosphere.

Discussion: The proposed elimination of the condominium ownership requirements in the downtown and amendment to parking standards will create additional development capacity and encourage more residential and other commercial development downtown. Additional resident’s downtown will reinforce the vision statement emphasis on the “everyday” downtown. Updates to the transportation element to emphasize the importance of the transit service to the city and the downtown specifically are consistent with the Town Center Plan. Other policy amendments related to the Town Center Plan include the desire to obtain a grocery store downtown, additional small public spaces, additional public art opportunities, and promoting healthy living. The proposed changes to the East Sumner Neighborhood Plan as part of Alternatives 2 and 3 support an urban village in East Sumner while maintaining the downtown as the city’s primary urban center.

East Sumner Neighborhood Plan

The East Sumner Neighborhood Plan and EIS was completed in 2001 and established the East Sumner Neighborhood as a future urban village with a mix of land uses with design elements consistent with neo-traditional development. The plan calls for the development of an integrated street network, a range of commercial and residential land uses, and open space amenities all within a walkable environment.

Discussion: The East Sumner Neighborhood Plan update associated with Alternatives 2 and 3 is generally consistent with the original East Sumner Plan from 2001. The plan update maintains the key elements of the vision established in the original plan for a walkable mixed-use urban village. The plan update modifies the zoning designations to increase development capacity for housing and jobs in the neighborhood in part to meet future growth targets in compliance with GMA. The plan update also includes a more defined plan and timing for major investments in public facilities including new and existing street improvements, off-site wetland mitigation, and open space and trails. Alternative 2 would be a moderate implementation of the plan vision and Alternative 3 would provide a greater implementation of the vision with greater infrastructure investment and off-site wetland mitigation. These investments are likely to serve as a catalyst for development in the neighborhood and make progress towards achieving the vision for the East Sumner Neighborhood Plan as conceived during the original neighborhood planning process from 2001.

Sumner Zoning Code

The Sumner Zoning Code establishes zoning districts, land use and development standards, and design and development guidelines. Zoning districts include agricultural, single-family residential, multi-family residential, commercial and manufacturing. The districts include a range of residential densities for single and multi-family, mixed-use urban village areas, light and heavy manufacturing and industrial districts, and commercial districts specific to general, interchange and neighborhood commercial areas. The code has two overlay districts for clustered development and urban villages along with allowances for planned residential development and planned mixed-use development that provides greater flexibility in the design of development projects. Development regulations address height, setback and yard area regulations in addition to requirements for off-street parking, signage, landscaping, historic preservation, and non-conforming lots, structures and uses.

Discussion: The No Action Alternative would not warrant any immediate changes to the Sumner Zoning Code.

Alternatives 2 and 3 include amendments to the zoning code including an updated zoning scheme for the East Sumner Neighborhood that increases capacity for jobs and housing; reduced off-street parking requirements for residential development downtown, and the rezoning of several properties consistent with the goals and policies of the comprehensive plan and other city plans. The proposed new street improvements as part of Alternative 3 are consistent with the existing purpose of the Urban Village (UV) Overlay District to establish a gridded street and driveway network in mixed-use areas. The rezoning strategy and public improvements included in Alternative 3 will advance the urban village planning effort for the East Sumner Neighborhood as described in the purpose section of the UV Overlay District.

Other amendments to zoning designations that are part of Alternatives 2 and 3 are relatively minor in nature including the rezoning of the AG property to Residential Protection to simplify the City's zoning map while retaining low intensity standards, rezoning of a small parcel on Wood Avenue from NC to M-1 and the rezoning of property along the East Valley Highway from MDR to M-1 (Alternative 3). The Fleischmann's Property and the former Sumner Golf Course will be added to the MIC Zone for Alternatives 2 and 3. These properties are already planned for employment uses.

Mitigation Measures

Incorporated Plan Features

- All of the plan alternatives have sufficient capacity to accommodate the growth targets for population, housing and employment to the year 2035 with the exception of Alternative 1, which lacks sufficient capacity to meet the housing target for 2035.
- Policy and code amendments related to the downtown are consistent with and further the goals of the Town Center Plan including, reducing on-site parking requirements, eliminating the condominium ownership requirement, and promoting livability enhances in the downtown such as small public open spaces, public art and healthy living initiatives.
- Alternative 3 includes significant investments in public infrastructure include new and existing street improvements, off-site wetland mitigation, and public open space and trail improvements. These improvements advance the goals of the Growth Management Act and city and county plans that support dense mixed-use urban villages with multi-modal transportation options.
- The City is conducting a “best available science” review as part of the update to the critical areas regulation consistent with GMA requirements.
- The City is performing a SEPA planned action for the East Sumner Neighborhood Plan update.
- The City is reviewing policies and practices related to long-term agricultural lands within the City limits.
- Policy amendments include referencing the Ecology Stormwater Manual and low impact development techniques.
- Alternative 3 includes off-site wetland mitigation and supports development of the mixed-use urban village in the East Sumner Neighborhood.
- The East Sumner Neighborhood Plan Update will guide development and public investments in the East Sumner Neighborhood.

Applicable Regulations and Commitments

- The City of Sumner Municipal Code includes the following land development regulations:

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- The Sumner Zoning Code (Title 18) includes zoning and design standards intended to allow for compatible development.
- The Sumner Environment Regulations (Title 16) address environmental review, shoreline use and development, and natural resource and critical areas to ensure development is planned and designed to minimize impacts on the environment
- The Sumner Subdivision Regulations (Title 17) include standards for land division to ensure development is supported by adequate infrastructure and public facilities and consistent with the City's plans and policies
- The Town Center Plan guides development in the downtown.
- The Design and Development Guidelines ensure detailed site, building, and parking design is consistent with the City's vision.
- The Shoreline Master Program addresses development and land use within 200' of shorelines of the state.

Other Potential Mitigation Measures

- Improve communication and coordination with Pierce Transit to provide increased transit service to the East Sumner Neighborhood as it develops into an urban village as well as other areas of the city or consider developing a long-term community transit system.

Significant Unavoidable Adverse Impacts

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

3.9 Public Services, Capital Facilities and Utilities

The analysis of public services, capital facilities, and utilities examines how each of the three alternatives impacts Sumner's public services, capital facilities, and utilities by building upon the analysis performed as part of the 2010 Comprehensive Plan EIS.

The 2010 EIS analyzed the impacts of several growth Alternatives for 2030: No Action, UGA Expansion, and UGA Modification. The 2030 population and employment capacity for each 2010 EIS Alternative is shown in Exhibit 3-58.

Exhibit 3-58. 2010 EIS Population and Employment Capacity by Alternative

Feature	No Action	UGA Expansion	UGA Modification
Population Capacity	15,495	16,459	14,706
Employment Capacity	19,072	20,975	20,975

Source: City of Sumner, 2010

The current SEIS analyzes three alternatives for growth in Sumner, as described in Chapter 2. The 2035 population and employment capacity figures for each alternative are shown in Exhibit 3-59 and include both the city limits and the approved UGA without the modifications studied in 2010.

Exhibit 3-59. Current Study Population and Employment Capacity by Alternative

Feature	Alternative 1	Alternative 2	Alternative 3
Population Capacity	16,578	16,941	17,004
Employment Capacity	22,255	22,255	22,608

Source: BERK Consulting 2014

The current plan alternatives have similar population and employment capacities in the city limits as those analyzed in 2010. The most significant change in growth is in employment capacity to meet the increased employment target for 2035; the increased growth was studied in 2014 as part of the City's 2013 Docket addressing the Sumner Meadows Golf Course surplus.

The 2035 targets include the full capacity of the UGA outside of the city limits; while the 2030 UGA target provided by Pierce County is significantly less than the capacity of the UGA since it is based on past growth trends, the 2035 UGA growth estimate conservatively addresses the total land capacity for the area.

Therefore, the analysis of impacts for public services, capital facilities and utilities focuses on services and facilities that will likely be impacted by increases in land capacity or due to changing conditions such as new school enrollment projections. The studied topics in Section 3.9 include: City Facilities, Law Enforcement, Fire and Emergency Medical Services, Libraries, Schools, Sewer, Water, Stormwater, Solid Waste, and Utilities such as power and telecommunications. Parks and Recreation is addressed separately in Section 3.10 below.

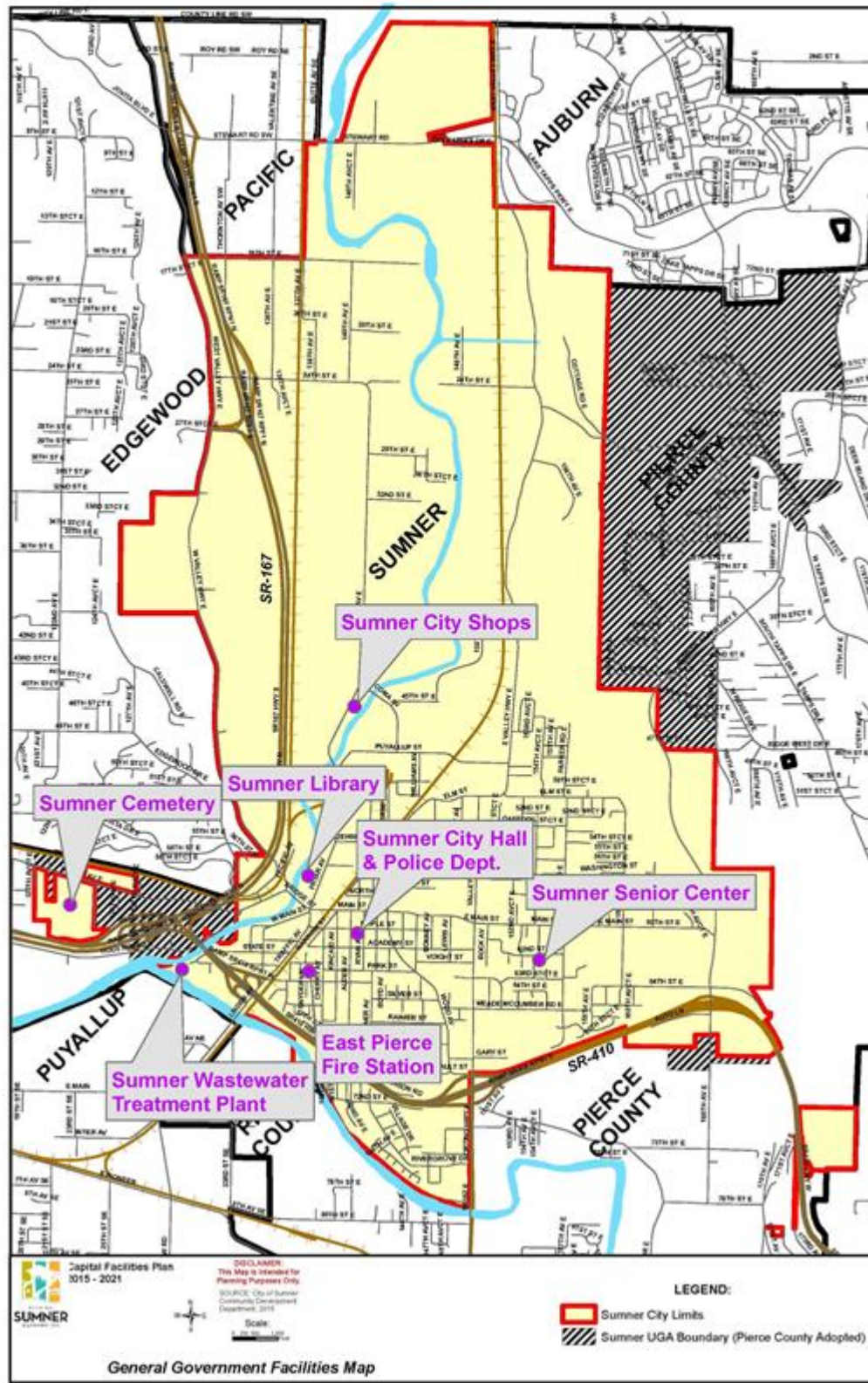
City Facilities

Affected Environment

Citywide

The major city facilities in the plan area, excluding parks and fire and emergency medical facilities, are the Sumner Cemetery, City Hall, City Public Works Facilities (City Shops), and multi-purpose center. Major city facilities are shown in Exhibit 3-60.

Exhibit 3-60. General Government Facilities Map



Source: City of Sumner 2015

The existing space for general government facilities is shown in Exhibit 3-61.

Exhibit 3-61. City General Government Buildings

Facility	Building Area (sf)
General Government	14,577
Police	7,654
Public Works Shops	17,136
Total	39,367

Source: City of Sumner, 2015

City Hall is located at 1104 Main Street and houses offices for Administration, Municipal Court, Finance, Community Development, City Attorney, Human Resources, and Public Works Department (City of Sumner 2015). The building area for these services is 14,577 square feet, which does not include the Police Department, located in the same building. More detailed information on city facilities is provided in the 2010 City of Sumner Comprehensive Plan Update and Amendments EIS.

The City's 2012 Comprehensive Plan adopted levels of service for city facilities to meet the needs of city operations, as shown in Exhibit 3-62.

Exhibit 3-62. City Facilities Adopted Level of Service (LOS)

City Facility	LOS (Square Feet Per Capita)
General Government	1.13
Police	0.44
City Shops (buildings only)	1.8

Source: City of Sumner, 2012

East Sumner

None of the above-mentioned city facilities are located in East Sumner. The City owns land along Salmon Creek for stormwater and habitat management purposes.

Impacts

Impacts Common to All Alternatives

As shown in Exhibit 3-63, the City currently has enough facility space to meet the LOS standard for general government and police, but has a small deficit of space for city shops. Under each Alternative there will be a deficit of space for general government facilities and city shops in 2035, and a surplus of space for police.

Exhibit 3-63. City Facility Space: Existing and 2035 Demand (square feet)

	Existing Space	Existing Demand ¹	Surplus/ Deficit	2035 Surplus/Deficit		
				Alt 1	Alt 2	Alt 3
General Government	14,577	10,786	3,791	(4,156)	(4,566)	(4,638)
Police	7,654	4,200	3,454	360	200	172
City Shops	17,136	17,181	-45	(12,704)	(13,358)	(13,471)

Source: City of Sumner 2010, BERK 2015

¹ Based on OFM 2014 Sumner population estimate of 9,545.

Impacts specific to the No Action

Under the No Action Alternative, the City would have a deficit of 4,156 square feet of general government facility space and a deficit of 12,704 square feet of space for city shops.

Impacts Specific to the Minimal Zoning Action

Under the Minimal Zoning Action Alternative, the City would have a deficit of 4,566 square feet of general government facility space and a deficit of 13,358 square feet of space for city shops.

Impacts Specific to the Assertive Collaborative Action

Under the Assertive Collaborative Action Alternative, the City would have a deficit of 4,638 square feet of general government facility space and a deficit of 13,471 square feet of space for city shops.

Mitigation

Incorporated Plan Features

- All alternatives propose retaining the existing City Hall, City Shops, and Multi-Purpose Center in public use land use designation. If additional sites are acquired to meet city facility needs, they should be designated similarly.
- Under Alternatives 2 and 3 the City is preparing an updated Capital Facilities Plan.

Applicable Regulations and Commitments

- The City has committed to maintaining the Sumner Cemetery for perpetuity.

Other Potential Mitigation Measures

- The City should initiate a study of space at the Public Works Shops, including a review of LOS, to determine if changes to LOS are warranted or if planning for additional space for Public Works, Parks, and Police departments would be needed.
- The City could continue to monitor space utilization for City facilities as the City grows. As utilization increases, the City should seek additional space to maintain LOS or change LOS.
- The City should initiate review of city facilities, growth, and demand to calibrate the analysis of space needs.

Significant Unavoidable Adverse Impacts

With identified mitigation measures, no significant unavoidable adverse impacts are anticipated under any of the alternatives.

Law Enforcement

Affected Environment

Citywide

The Sumner Police Department provides law enforcement services with city limits. Sumner Police Department headquarters are located at Sumner City Hall at 1104 Maple Street. The Police Department has 23.5 authorized full-time employees for the 2015-2016 biennium (City of Sumner, 2014). These staffing levels include 19 commissioned officers, 3.5 limited commission officers, 12.5 civilians. The Sumner Municipal Court is the court of limited jurisdiction for the City and has jurisdiction over traffic infractions and criminal matters including misdemeanors, gross misdemeanors, criminal traffic violations, and other violations of City ordinances.

Level of Service Standards

The City of Sumner has adopted a Level of Service (LOS) standard of one police officer per 500 residents (City of Sumner, 2012). Based on the City's estimated population of 9,545 in 2014, the City would require 19 officers to meet its adopted LOS standard. As such, the City is currently meeting its adopted LOS standard for police staffing. However, due to increased development in the north industrial area and thus an increase in the assessed valuation in the City, the department's traffic and calls are increasingly disproportionate to the population size, and thus may not be the most effective measure for Police Department service levels (City of Sumner 2010).

The 2014 Comprehensive Plan update proposes additional new LOS standards for police staffing. In addition to a standard of two commissioned officers per 1,000 population, the plan proposes:

- Maintain a ratio of at least one commissioned patrol officer for every 1,000 calls for service each year.
- Provide one sergeant for every 6-7 commissioned patrol officers.
- Provide and maintain one detective position at a ratio of 1/400 part A offenses.

These additional LOS standards, if adopted, could ensure that police staffing levels are adequate to serve the needs in the City, based on both population and employment.

As described in the City Facilities section above, the City's Comprehensive Plan has an adopted LOS standard for police building space of 0.44 square feet per capita. Based on estimated City population of 9,545 in 2014, the City would require 4,200 square feet of building space to meet its adopted standard. With a current space allocation of 7,654 square feet, the City is currently meeting its adopted LOS standard for police building space.

East Sumner

East Sumner is served by the Sumner Police Department.

Impacts

Impacts Common to All Alternatives

All alternatives accommodate growth in Sumner with the primary difference in the distribution and location of that growth. It is anticipated that additional growth accommodated within the current plan area under all alternatives would result in increased demand for public safety services. In particular, additional police services would likely require additional personnel compared to existing conditions to meet demand. New development would likely enhance assessed valuation, tax base, and revenues available to the affected jurisdictions and special districts for providing police and emergency services. Availability of services will be dependent on allocated budgets. As portions of the City's UGA are annexed to the City, fire providers remain the same, but police service would transfer from Pierce County Sheriff's Office to the Sumner Police Department.

As described above, the 2012 Comprehensive Plan contains a LOS standard of one officer per 500 residents. Applying that standard to the population capacity of Sumner's city limits and UGA in 2035 under each alternative provides estimates of additional police staffing needed above the 2015-2016 budgeted level of 19 officers, as shown in Exhibit 3-64. The additional staff required to meet LOS ranges from 14 to 15, of which seven are for the UGA population.

Exhibit 3-64. Projected 2035 Police Staffing Required to Meet Level of Service

Measure	2014 Population	Alternative 1	Alternative 2	Alternative 3	UGA
Total Officers Required	19	33	34	34	7
Additional Officers Required	0	14	15	15	N/A

Source: City of Sumner 2012, City of Sumner 2014, BERK 2015

EAST SUMNER

No impacts specific to law enforcement are expected in East Sumner.

Impacts Specific to the No Action

Impacts for this alternative are consistent with the impacts common to all alternatives. No Action would result in slightly less demand for police staff as the other alternatives, but still a large increase of 14 officers.

Impacts Specific to the Minimal Zoning Action

Impacts for this alternative are consistent with the impacts common to all alternatives. The increased capacity for population, housing and employment compared to the No Action are slightly higher and still show a large increase in the demand for officers. Demand for police services may increase in the East Sumner Neighborhood as development occurs and greater calls for service come from a more dense residential and commercial development pattern.

Impacts Specific to the Assertive Collaborative Action

Impacts for this alternative are similar to Alternative 2. Demand for police services may increase in the East Sumner Neighborhood as development occurs similar to but greater than Alternative 2.

Mitigation

Incorporated Plan Features

- The Capital Facilities Element of the City Comprehensive Plan includes goals, policies, and objectives, which establish LOS standards and provision of services to meet the community's public safety needs. This Element is being updated under Alternatives 2 and 3.

New LOS measures for police staffing proposed in the 2014 Comprehensive Plan would help ensure staffing levels are adequate to serve the needs of the City based on both population and employment. These include: one commissioned patrol officer for every 1,000 calls for service each year; one sergeant for every 6-7 commissioned patrol officers; and one detective position at a ratio of 1/400 part A offenses. Applicable Regulations and Commitments

- The Sumner Police department enforces various regulations of the City such as Title 9 Criminal Code, Title 10, Vehicles and Traffic

Other Potential Mitigation Measures

- The City could develop an "adequacy of public facilities" standard to address the sizing and concurrency of needed capital facilities in relation to growth.
- The City could implement Crime Prevention through Environmental Design principles to allow for appropriate lighting, landscaping, and visibility.
- The City could consider implementing or revising SEPA mitigation fees to help pay for other needs and services.

Significant Unavoidable Adverse Impacts

Future population growth and development will continue to increase the need for police services and facilities under all alternatives. Regular capital facility and staffing need planning can minimize impacts and meet future demand.

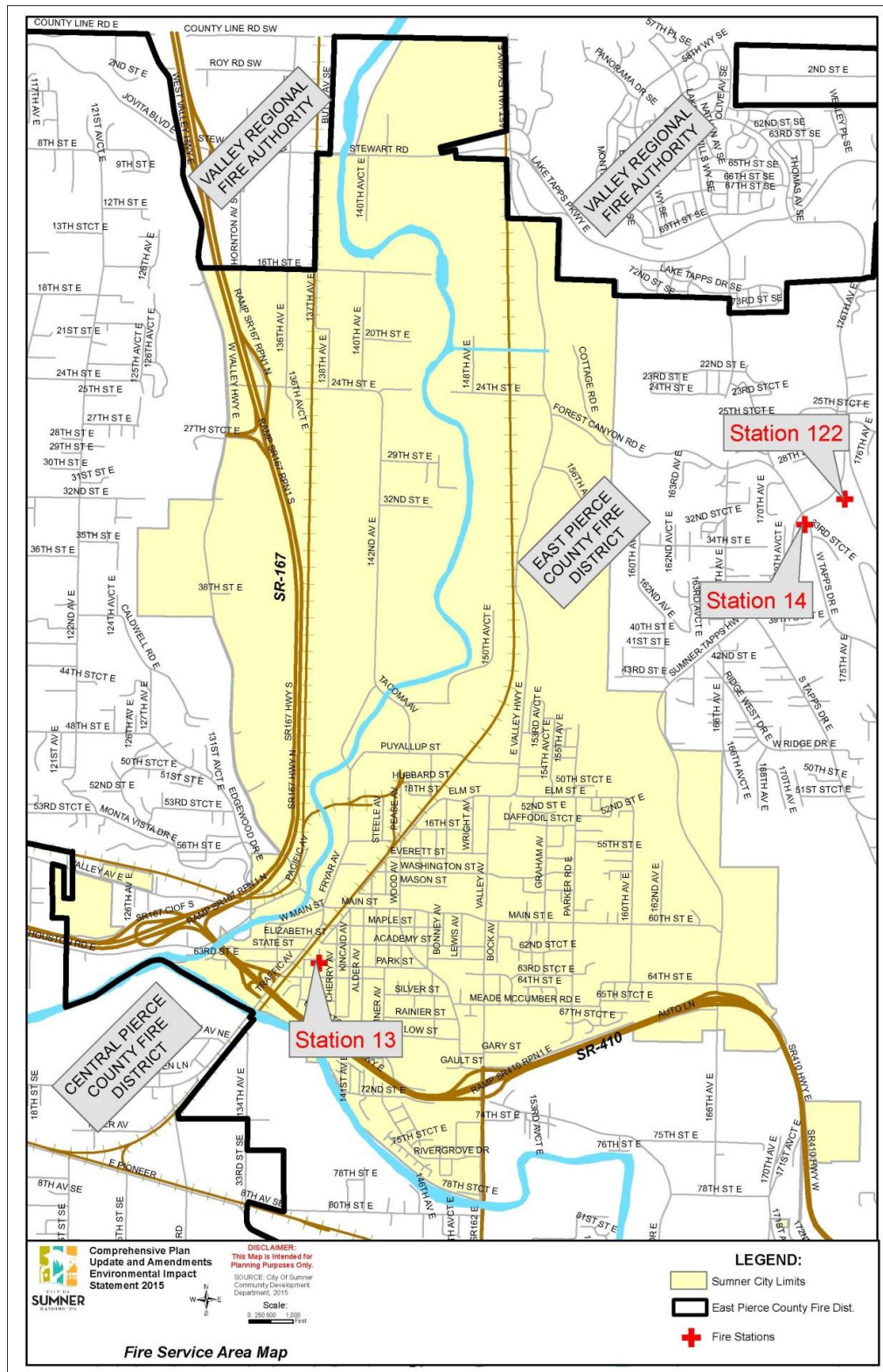
Fire and Emergency Medical Services

Affected Environment

Citywide

The City of Sumner was formally annexed to East Pierce Fire and Rescue (EPF&R) by a vote of the citizens of the City of Sumner in 2008. EPF&R provides fire, rescue and emergency medical services to more than 88,200 people living in and around Sumner, Edgewood, Milton, Bonney Lake, South Prairie, Wilkeson and the unincorporated communities in between. The EPF&R service area, as shown in Exhibit 3-65 covers approximately 151 square miles (City of Sumner, 2015).

Exhibit 3-65. East Pierce Fire and Rescue Service Area Map



Source: City of Sumner 2015

EPF&R currently operates 12 fire stations, one of which is located within the current plan area. Station 13 (Sumner Station) is located at 800 Harrison Street in Downtown Sumner. In 2013, East Pierce responded to 8,519 calls for emergency services, with 74% consisting of EMS incidents. Average response time for the first unit to arrive on scene was 6 minutes, 34 seconds (EPF&R 2013).

Level of Service Standards

As the fire service provider for the City of Sumner, EPF&R has standards of coverage document that addresses LOS standards from two different perspectives: time to arrival of the first unit and time to the arrival of a minimum acceptable (effective) response force. The goal is for first-due response units to arrive at incidents in urban areas served by staffed fire stations within 5 minutes to the 90th percentile and to provide a minimum acceptable response force arriving at incidents within 10 minutes to the 90th percentile.

As of 2009, EPF&R was meeting its 5-minute response time goal only 60% of the time for fire response, though its 90% performance was 5 minutes and 37 seconds. For EMS-only responses, the district met its goal only 59% of the time, and its 90% performance was 6 minutes and 4 seconds. (City of Sumner 2010)

In 2013, East Pierce responded to 8,519 calls, with 74% consisting of EMS incidents. Average response time for the first unit to arrive on scene was 6 minutes, 34 seconds (EPF&R 2014). At this time, data is not available on actual performance regarding assembly of minimum acceptable response forces by incident type, due to limitations in the structure of the data and software used for data collection and reporting by East Pierce Fire & Rescue.

East Sumner

East Sumner is served by East Pierce Fire and Rescue.

Impacts

Impacts Common to All Alternatives

New development and population growth associated with the update of City Comprehensive Plan population allocations will result in an increased demand for fire protection and related services; in particular there would be greater increases in light industrial uses on vacant lands along Stewart Road and East Valley Highway, and more mixed uses in the Town Center and East Sumner, in particular.

The specific need for services, equipment, and facilities would be determined through ongoing planning by EPF&R and would be based on response time goals and/or the timing and location of future development that would be allowed under the current comprehensive plan (No Action Alternative), the Minimal Rezoning Alternative, or the Assertive Collaborative Action Alternative. Greater infill development in urban areas will allow for greater efficiency of fire protection service as compared to UGA expansion or rural growth, which could increase driving distance and response time to the larger population. See Impacts by alternative below for how the location of future development and anticipated infill affects fire and EMS service provision.

Impacts Specific to the No Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives.

Impacts Specific to the Minimal Zoning Action

Under the Minimal Zoning Action Alternative, there would be more growth in East Sumner and less access and connectivity compared to Alternative 3, but no adverse impacts on fire responses are expected.

Impacts Specific to the Assertive Collaborative Action

Under the Assertive Collaborative Action Alternative, the street system would be more gridded and there would be improved access, including reconfiguration of the difficult intersection at Sumner-Tapps Highway. This could improve the safety of motorists and reduce responses needed. In addition, demand for fire service in the East Sumner Neighborhood may increase as development occurs.

Mitigation

Incorporated Plan Features

The City of Sumner Comprehensive Plan has policies that establish a Level of Service (LOS) for fire services in the city. Under Alternatives 2 and 3 the City is updating the Capital Facilities Element and considering appropriate LOS in conjunction with EPF&R.

Applicable Regulations and Commitments

- EPF&R has adopted response time objectives and prepares regular reports.
- The City and EPF&R will continue to work with mutual aid partners for backup response to emergency incidents.
- All new development is required to meet City development regulations as well as the International Building Code and International Fire Code.
- National and state industry standards address fire district response times and staffing minimums (Fire Protection Association Standard 1710 and State's Labor & Industries safety requirements (WAC 296-305-05001)).

Other Mitigation Measures

- The City could hold regular meetings with EPF&R to coordinate fire services with new growth and demand for services.
- EPF&R should use updated population and employment allocations and land capacity in this EIS as part of their ongoing capital facility planning process.
- The City and EPF&R could consider an agreement that implements impact fees for capital improvements in city limits and revises the SEPA mitigation fees to help pay for other needs and services.

Significant Unavoidable Adverse Impacts

Future population growth and development will continue to increase the need for fire services and facilities under all alternatives. Regular capital facility and staffing planning can minimize impacts and meet future demand.

Libraries

Affected Environment

Citywide

The Pierce County Library System (PCLS) provides library services in the current plan area. In 2013 it served a population of 555,285 persons in unincorporated Pierce County and the cities and towns of Bonney Lake, Buckley, Dupont, Eatonville, Edgewood, Fife, Gig Harbor, Lakewood, Milton, Orting, South Prairie, Steilacoom, Sumner, University Place, and Wilkeson. (Pierce County Library System 2014) Existing branch library facility data is shown in Exhibit 3-66.

Exhibit 3-66. Pierce County Library System Facilities

Branch	Floor Space (Square Feet)
Bonney Lake	6,480
Buckley	4,100
DuPont	3,610
Eatonville	4,100
Fife	6,000
Gig Harbor	15,214
Graham	7,152
Key Center	3,949
Lakewood	32,592
Milton-Edgewood	6,583
Orting	2,700
Parkland Spanaway	15,576
South Hill	20,100
Steilacoom	4,039
Summit	7,424
Sumner	10,600
Tillicum	2,100
University Place	15,000

Source: Pierce County Library System, 2014

Sumner Regional Branch Library

The Sumner Library is a regional branch library, located at 1116 Fryar Avenue. The library is open 7 days and 63 hours per week. The 10,600 square foot building was constructed in 1979 and expanded in 1995. The land on which the library is located is owned by the City of Sumner and leased to the Library. The City and the PCLS each own a one-half interest in the building.

Level of Service

The 2012 Sumner Comprehensive Plan sets a Level of Service for library services based on the Pierce County Library District standard (Policy 1.4). PCLS's long-term capital facilities plan, *Pierce County Library 2030*, recommends an LOS standard of 0.61 to 0.71 square foot per capita.

Based on the City of Sumner's estimated 2014 population of 9,545 and library facility space of 10,600 square feet at the Sumner Library, the existing effective level of service is 1.11 square feet per person, well above the range of LOS recommended by the Pierce County Library District. Over time as growth occurs, the space per person will decline. Under the proposed PCLS LOS standard, the Sumner library can serve between 14,930 and 17,377 people.

Planned Improvements

Pierce County Library 2030 describes updates to LOS standards, industry best practices for library facilities and services, and proposes improvements to PCLS. It proposes adding one new library in Frederickson, and relocating or expanding the remaining libraries in the system. Additional improvements to the system include more seating, more meeting space, and increasing capacity for circulation among other things.

Pierce County Library 2030 proposes to relocate and expand the Sumner Library. The plan includes options for expanding the library on its current site or preferably relocating it more central to Downtown Sumner. The plan proposes to expand the Sumner Library to a facility in the range of 27,200 to 31,700 square feet to meet the needs of the Sumner community to the 2030 planning horizon. A

potential joint-use/mixed use development with the City of Sumner is mentioned at “Sumner Site 1” or another location downtown. (Pierce County Library System 2010).

East Sumner

East Sumner is served by the Sumner Regional Branch Library.

Impacts

Impacts Common to All Alternatives

As described above, PCLS recommends an LOS standard of 0.61 to 0.71 square foot per capita. The current library space in Sumner of 10,600 square feet is anticipated to meet the 0.61 LOS standard in 2035 under all Alternatives, but not the 0.71 standard, as shown in Exhibit 3-67. With the expansion of the Sumner Library identified in *Pierce County Library 2030*, library space would be sufficient to meet demand under all Alternatives.

Exhibit 3-67. Library Space Needed to Meet 2035 Level of Service (Square Feet)

	Alternative 1	Alternative 2	Alternative 3	UGA
Low-end LOS (0.61)				
Library space needed	10,113	10,334	10,372	2,070
Surplus/deficit space	487	266	228	N/A
High-end LOS (0.71)				
Library space needed	23,349	23,861	23,949	4,780
Surplus/deficit space	(12,749)	(13,261)	(13,349)	N/A

Source: Pierce County Library System 2014, BERK 2015

EAST SUMNER

There are no impacts on library facilities specific to East Sumner. Growth in East Sumner will contribute to a cumulative demand for library services.

Impacts specific to the No Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives.

Impacts Specific to the Minimal Zoning Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. The increase in population capacity for this alternative does not have a significant impact on library services compared to the No Action. Demand for library services in the East Sumner Neighborhood may increase as development occurs.

Impacts Specific to the Assertive Collaborative Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. The increase in population capacity for this alternative does not have a significant impact on library services compared to the No Action. Demand for library services in the East Sumner Neighborhood may increase as development occurs, and would have the greater level of demand of the three alternatives.

Mitigation

Incorporated Plan Features

- The Capital Facilities Element references the Pierce County Library District plans to provide access to library services consistent with the Library District’s LOS standards.

Applicable Regulations and Commitments

- *Pierce County Library 2030* includes a capital project to more than double the Sumner Library space which would resolve future demands calculated in this SEIS.

Other Potential Mitigation Measures

None proposed.

Significant Unavoidable Adverse Impacts

Under each Alternative, future population growth and development will continue to increase the need and demand for public services such as libraries. Coordination with service providers and regular review of capital plans by the City, school districts, and the Pierce County Library District will help avoid impacts.

Schools

Affected Environment

The City of Sumner is served by the Sumner and Dieringer School Districts that also serve other adjacent municipalities and unincorporated areas. The boundaries of the Sumner and neighboring Dieringer School Districts are shown in Exhibit 3-68.

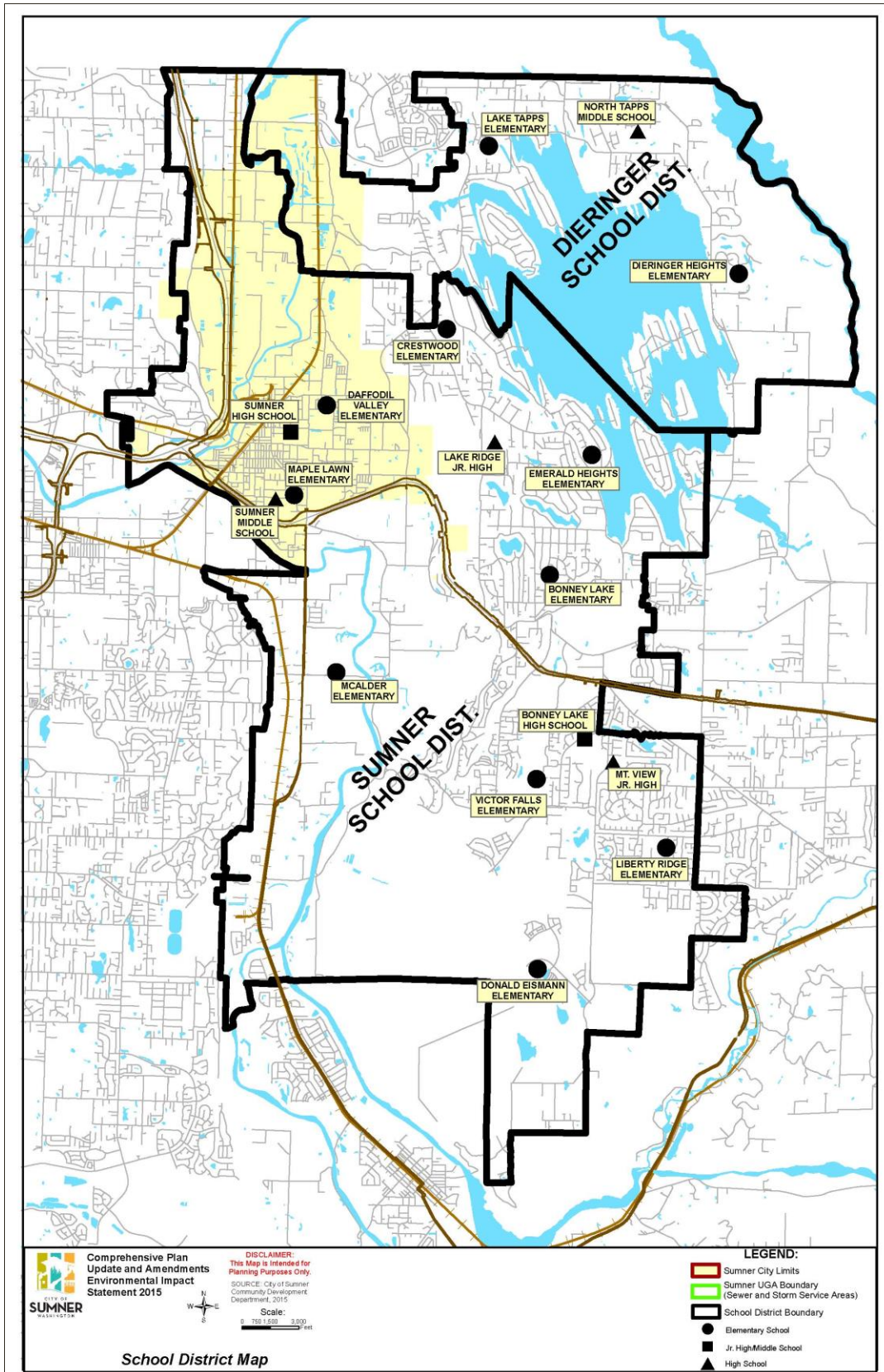
Sumner School District

EXISTING FACILITIES

The Sumner School District serves all or portions of the cities of Bonney Lake, Sumner, Edgewood, Pacific, and unincorporated areas of Pierce County. The District includes two high schools, three middle schools, and eight elementary schools (Sumner School District, 2013). McAlder Elementary School was closed in 2012 after a vote of the Sumner School Board. The following schools serve the Sumner current plan area:

- Sumner High School;
- Sumner Middle School;
- Daffodil Valley Elementary; and
- Maple Lawn Elementary.

Exhibit 3-68. School District Map



Source: City of Sumner 2015

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION**

School sites vary in size depending on available land. In general, elementary school sites are planned to be about 15 acres. Junior and senior high school sites are planned to be about 30 and 40 acres, respectively. There are 19 portable classrooms in use in the six schools in the plan area. An inventory of existing school facilities in the current plan area is shown in Exhibit 3-69.

Exhibit 3-69. Sumner School Facilities

School	Site Size (Acres)	Facility Size (Square Feet)	Capacity (Students)	Number of Portables
High Schools:				
Sumner High School	26.8	183,350	1,375	3
Middle Schools:				
Sumner Middle School	23.0	94,702	850	7
Elementary Schools:				
Daffodil Valley Elementary	12.7	48,035	525	0
Maple Lawn Elementary	8.5	50,626	450	7

Source: Sumner School District 2014a

SCHOOL ENROLLMENT

According to the Washington State Office of the Superintendent of Public Instruction (OSPI), the Sumner School District had an enrollment of 8,568 in the 2013-2014 school year, which included 3,389 for the four schools in the Sumner current plan area. School enrollment and capacity are shown in Exhibit 3-70. While overall capacity and enrollment are evenly matched, Sumner Middle School has insufficient capacity while Sumner High School has excess capacity.

Exhibit 3-70. Sumner Schools Enrollment and Capacity, 2013-2014

School	Capacity	Enrollment	Percent Over/Under Capacity
High Schools:			
Sumner High School	1,375	1,648	20%
Middle Schools:			
Sumner Middle School	850	711	-16%
Elementary Schools:			
Daffodil Valley Elementary	525	541	3%
Maple Lawn Elementary	450	489	9%
Total	3,200	3,389	6%

Source: OSPI 2014, Sumner School District 2014a

ENROLLMENT PROJECTIONS

OSPI projects future enrollment figures by school district. Its 2013 projections for the Sumner School District forecast an increase of 992 students or 11.6% between 2013 and 2020, as shown in Exhibit 3-71. The Sumner School District uses a modified version of the OSPI enrollment projection methodology and has projected a 2020 enrollment of 9,561 (Sumner School District 2014b). These projections from the 2009 OSPI projections used in the 2010 Sumner Comprehensive Plan EIS, which showed a two percent decrease in student population from 2009 through 2015 (City of Sumner, 2010). Note that these figures are for the Sumner School District as a whole and therefore include schools outside the plan area.

Exhibit 3-71. OSPI Enrollment Projections for Sumner School District

	2013 (actual)	2014	2015	2016	2017	2018	2019	2020
Total Students	8,568	8,700	8,822	8,931	9,050	9,180	9,354	9,560

Source: OSPI 2013

The Sumner School District maintains student generation numbers to determine the number of students that can be expected from new residential construction. These numbers were updated in the Sumner School District 2014 Capital Facilities Plan and are depicted in Exhibit 3-72.

Exhibit 3-72. Student Generation Rates, Sumner School District

Grade	Single Family	Multifamily
K-5	0.323	0.112
6-8	0.152	0.070
9-12	0.174	0.102

Source: City of Sumner 2014b

IMPACT FEES

The Sumner School District Board of Directors, in association with local jurisdictions, establishes impact fees for new residential construction. Impact fees are a means of collecting funds to meet the “un-housed student need” and provide funds to accommodate growth and demand for school facilities. These impact fees ensure that new development pays for a fair share proportional amount of the costs incurred by the school district for expanding facilities and new construction. The impact fee charged is based on the costs for providing the additional space and the projected number of students in each new residential unit. The current impact fee is \$3,215 for a single-family residence and \$830 for a multifamily residential unit (Sumner Municipal Code 3.50.110).

PLANNED IMPROVEMENTS

The *Sumner School District 2014-2020 Capital Facilities Plan* predicts the need for several new school facilities in the District by 2034 to keep pace with growth, including at least two new elementary schools, one new middle school, and additions to or a new comprehensive high school. In addition, the District has installed portable classrooms at schools to temporarily meet growth demands.

RECENT FACILITIES PROJECTS

In 2007 voters approved a \$114 million capital projects bond, which funded several school modernization projects including replacement of Lakeridge Middle School. In addition, Bonney Lake, Maple Lawn and Victor Falls Elementary Schools, and Sumner Middle School were modernized, bringing aging buildings up to current energy, seismic, fire and life safety building codes (Sumner School District 2013).

Dieringer School District

The Dieringer School District includes three schools, Lake Tapps Elementary School, Dieringer Heights Elementary School and North Tapps Middle School. The majority of Dieringer School District #343 is located in unincorporated Pierce County, bounded on the east by the White River, on the west by the Stuck River, on the north by the city of Auburn, and on the south by the cities of Bonney Lake and Sumner. The District surrounds the northern two-thirds of Lake Tapps and covers approximately 5.5 square miles. (Dieringer School District, 2014) In the Sumner current plan area the Dieringer School District serves the northeast Sumner city limits along East Valley Highway.

East Sumner

East Sumner is served by the Sumner School District. Local schools serving the neighborhood include Daffodil Elementary and Maple Lawn Elementary as well as Sumner Middle School and Sumner High School. However, no schools are located within the East Sumner Neighborhood District.

Impacts

Impacts Common to All Alternatives

CITYWIDE

Population growth in the current plan area would result in increased enrollment at Sumner and Dieringer school districts. Additional students would, in turn, place increased demand on school facilities and services. As described above, the 2013 OSPI projections show an increase in student enrollment in the Sumner School District of 11.6% from 2013 to 2020.

For the schools in the plan area, student population would likely grow as a result of the anticipated increase in households under the alternatives. This study anticipates a net increase of 1,862 single-family dwelling units and between 750 and 945 multifamily dwelling units by 2035, depending on Alternative. Using the Sumner School District's updated student factor, net new students in the plan area between the current year and 2035 would be between 1345 and 1477, as shown in Exhibit 3-73.

Exhibit 3-73. Projected 2035 Student Growth by Alternative

Grade	Alternative 1	Alternative 2	Alternative 3
K-5	685	704	707
6-8	336	347	349
9-12	324	417	420
Total	1345	1469	1477

Source: City of Sumner 2014b, BERK 2015

EAST SUMNER

The two elementary schools serving the East Sumner area are likely to be impacted by growth in population and new students under all Alternatives. OSPI enrollment figures and Sumner School District 2014 capacity figures show that in 2013 Daffodil Valley Elementary was 3% over capacity and Maple Lawn Elementary was 9% over capacity.

Impacts specific to the No Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. There would be a slightly lower demand than the action alternatives with a need to accommodate 1345 additional students.

Impacts Specific to the Minimal Zoning Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. There would be a need to accommodate 1469 additional students. The growth pattern is similar to Alternative 1 with slightly higher demand in East Sumner due to the Subarea Plan zoning changes that would allow for greater density of housing.

Impacts Specific to the Assertive Collaborative Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. Impacts are nearly identical with a need to serve 1477 students.

With the conversion of land from MDR to M-1 along East Valley Highway there would be a slightly lower demand for school services in the Dieringer School District.

East Sumner would have a greater growth and density of housing under Alternative 3 than the other alternatives and would drive more demand at schools with current capacity concerns.

Mitigation

Incorporated Plan Features

- The Capital Facilities Element contains policies and objectives which are designed to support the Sumner and Dieringer School District in providing the best education for students of the districts and includes objectives for coordination with the school districts on issues of common interest such as school facility locations, impacts of new development on schools, population and growth projections, impacts of school activities on the community, parks and recreation programs, and school involvement in the community.

Applicable Regulations and Commitments

- The Sumner School District has established impact fees for new residential construction. The current impact fee for the Sumner School District is \$3,215 for a single-family residence and \$830 for a multifamily residential unit.

Other Potential Mitigation Measures

- Consistent with City policies, the City should coordinate with the Sumner and Dieringer School Districts along with adjacent municipalities and the county to ensure timely exchange of growth information.

Significant Unavoidable Adverse Impacts

Under each Alternative, future population growth and development will continue to increase the need and demand for schools. Coordination with service providers and regular review of capital plans by the City and school districts will help avoid impacts.

Sewer

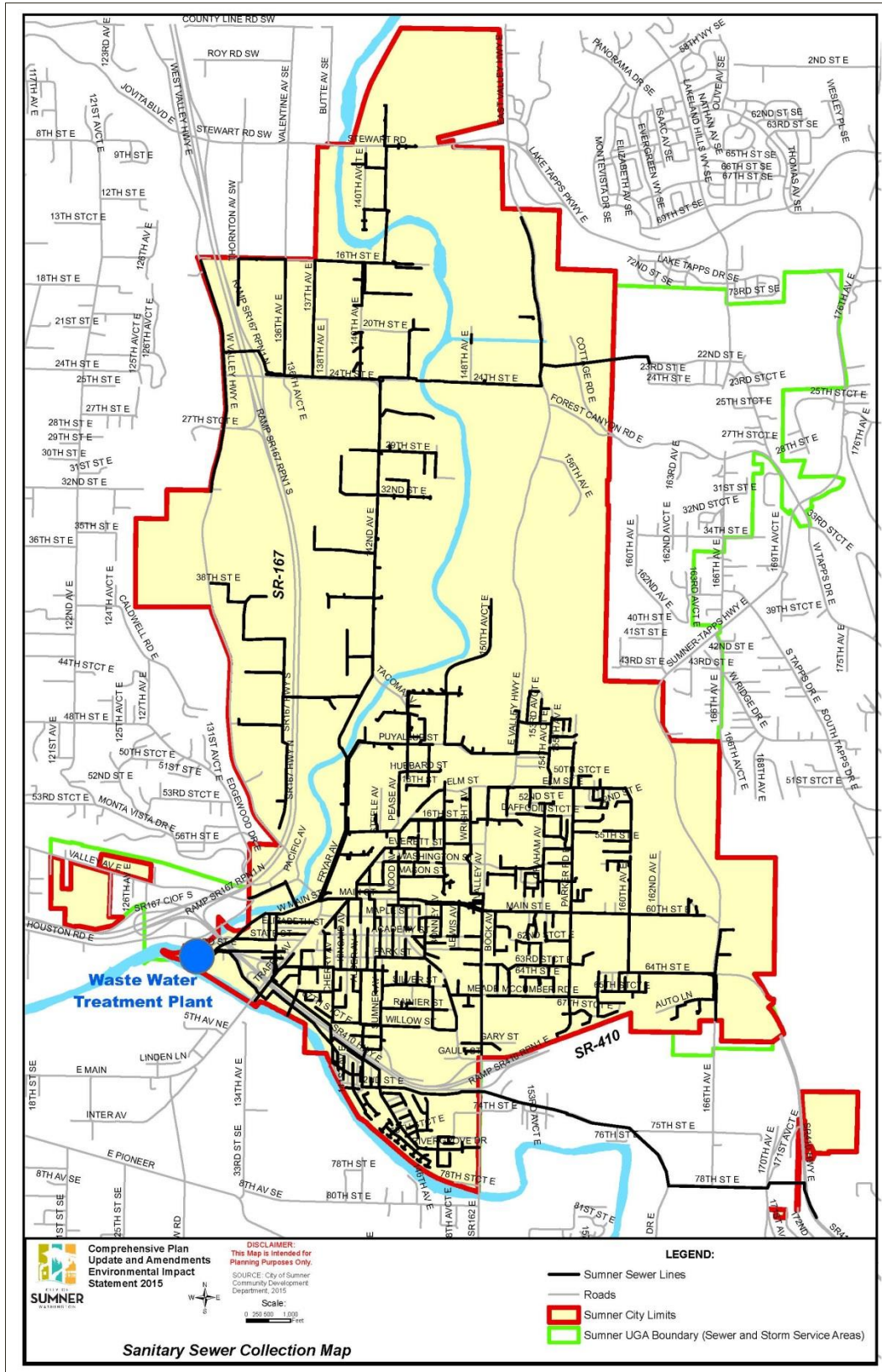
Affected Environment

Citywide

The information in this section is based on the *City of Sumner Sanitary Sewer Comprehensive Plan* (City Sanitary Sewer Plan), adopted in May 2000 (Parametrix, 2000), and the *Wastewater Treatment Plant Capacity Increase Analysis* completed in October 2009 (Gray & Osborne, Inc. 2009). The City Sanitary Sewer Plan analyzes the City's collection system, identifies any system deficiencies for existing and future flow conditions, and provides recommended improvements and cost estimates. In preparing the plan, the City's wastewater collection system was analyzed for existing and future capacity.

The City of Sumner (City) has operated a sanitary sewer system since 1927 and a wastewater treatment plant since 1957. The City's sanitary sewer service area includes the Sumner city limits, as well as portions of the Sumner UGA. As of 2010, the 7.2-square-mile service area contains 33.90 miles of sewer mains and 15 pump stations for different drainage basins throughout the area (City of Sumner 2010). The service area is divided into basins to analyze capacity needs. The boundaries of the service area and its constituent basins are shown in Exhibit 3-74, along with the existing collection system for sanitary sewer.

Exhibit 3-74. Sanitary Sewer Collection System



Source: City of Sumner 2015

WASTEWATER TREATMENT PLANT

The wastewater treatment plant (WWTP) is located at 13114 63rd Street East, at the confluence of the Puyallup and White (Stuck) rivers. The WWTP provides sanitary sewer treatment to all of the current plan area as well as the City of Bonney Lake. The City maintains an agreement with the City of Bonney Lake which allows Bonney Lake to use up to 55% of the plant's capacity, while the remaining 45% of the plant's capacity is reserved for flows from the Sumner service area.

The WWTP is a secondary treatment facility and discharges treated effluent to the White (Stuck) River. The last major upgrade to the WWTP occurred in 2004. Capacity measurements for treatment plants include wastewater flow (measured in gallons per day) and organic influent loadings (or solids). The most common measurements of organic loadings are 5-day biochemical oxygen demand (BOD₅) and total suspended solids (TSS). According to the 2010 Comprehensive Plan EIS, the WWTP treats an average wet weather wastewater flow of 2.44 mgd. According to *Wastewater Treatment Plant Capacity Increase Analysis* (2009), the permitted capacity of the WWTP as of 2009 was:

- Maximum Month (Design Flow): 4.59 million gallons per day (mgd)
- Peak Day Flow: 9.71 mgd
- Peak Hour Flow: 14.43 mgd
- Influent 5-Day Biochemical Oxygen Demand (BOD₅): 5,925 pounds/day
- Influent Total Suspended Solids (TSS): 5,875 pounds/day

By contrast, influent wastewater flows have grown more slowly than originally predicted, and the plant is not anticipated to reach its maximum permitted flow capacity until 2028.

SYSTEM CAPACITY IMPROVEMENTS

The City of Sumner is in the process of upgrading the WWTP to expand its treatment capacity, with completion anticipated for March 2016. (Personal communication with Mike Dahlem, City of Sumner Public Works, 2015) The resulting treatment capacity is as follows:

- Maximum Month (Design Flow): 6.10 mgd
- Peak Day Flow: 11.66 mgd
- Peak Hour Flow: 19.87 mgd
- Influent BOD₅: 10,900 pounds/day
- Influent TSS: 12,660 pounds/day

Future studies of the WWTP will examine increasing capacity to 9.3 mgd. (Personal communication with Mike Dahlem, City of Sumner Public Works, 2015)

WASTEWATER FLOW PROJECTIONS

The City Sanitary Sewer Plan developed wastewater flow projections to estimate demand for capital facilities. Flow projections included both a Service Area Population Method and a Land use Method.

The Land-Use Method, which is used here, establishes planning-level wastewater flow estimates by land use zone. Average daily flow estimates are shown in Exhibit 3-75.

Exhibit 3-75. Average Daily Wastewater Flows by Land Use Zones

Zoning District	Gallons/ Acre
Agriculture	250
Central Business District	1,500
General Commercial	1,500
Heavy Manufacturing	1,300
High Density Residential (20 units/acre)	4,600
Light Manufacturing	1,300
Low Density Residential - 12,000sf lots	625
LDR - 8,500sf lots	880
LDR - 7,200 sf lots	1,050
LDR - 6,000sf lots	1,250
Medium Density Residential (10 units/acre)	2,300
Neighborhood Commercial	1,500

Source: City of Sumner 2000

Several current zoning districts were not included in the 2000 City Sanitary Sewer Plan. For this analysis, these zones were given wastewater flow estimates from the closest zone in the 2000 plan.

East Sumner

East Sumner is served by the City of Sumner's sanitary sewer system.

Impacts

Impacts Common to All Alternatives

Development under all alternatives would increase wastewater flows from the study area, requiring conveyance and treatment, thus placing greater demand on the City's wastewater collection system. The flows generated by each alternative would vary by the intensity of development proposed and are shown below in Exhibit 3-76.

Exhibit 3-76. Projected 2035 Wastewater Flow by Alternative (Gallons per day)

Zoning Classification	Alternative 1		Alternative 2		Alternative 3	
	Developable Acres	gpd	Developable Acres	gpd	Developable Acres	gpd
Agriculture	66.1	16,528	66.1	16,528	66.1	16,528
Central Business District	15.2	22,785	15.2	22,785	15.2	22,785
Urban Village	-	-	44.8	67,185	44.8	67,185
General Commercial	113.0	169,545	102.0	152,955	102.0	152,955
Heavy Industrial	94.3	122,616	94.5	122,850	94.5	122,850
High Density Residential	68.2	313,628	74.2	341,182	74.2	341,182
Interchange Commercial	96.7	144,990	96.7	144,990	96.7	144,990
Light Industrial	1,240.2	1,612,195	1,240.7	1,612,923	1,258.2	1,635,712
Low Density Residential 12000	472.3	295,213	478.3	298,956	478.3	298,956
Low Density Residential 4000	21.3	26,563	3.1	3,863	3.1	3,863
Low Density Residential 6000	182.8	228,450	185.8	232,275	185.8	232,275
Low Density Residential 7200	44.8	46,998	44.8	46,998	44.8	46,998
Low Density Residential 8500	319.6	281,283	299.4	263,463	299.4	263,463
Medium Density Residential	108.1	248,676	104.3	239,982	86.5	199,042
Mixed Use Development	12.3	18,390	12.3	18,390	12.3	18,390
Neighborhood Commercial	20.7	31,020	14.4	21,645	14.7	22,050
PC - Community Center	13.1	13,797	13.1	13,797	13.1	13,797
PC - Moderate Single Family	492.2	615,250	492.2	615,250	492.2	615,250
PC - Neighborhood Center	8.4	12,615	8.4	12,615	8.4	12,615
PC - Public Institutional	60.6	63,672	60.6	63,672	60.6	63,672
Residential Protection	17.3	4,330	17.3	4,330	17.3	4,330
Study Area Total	3,467.2	4,288,543	3,468.2	4,316,633	3,468.2	4,298,887

Source: City of Sumner 2000, BERK Consulting 2015

Comparing the upgraded WWTP wastewater flow capacity with wastewater demand by Alternative and subtracting the 55% capacity allowance for Bonney Lake provides an estimate of WWTP surplus or deficit flow capacity in 2035, as shown in Exhibit 3-77.

Exhibit 3-77. 2035 WWTP Wastewater Flow Surplus/Deficit (mgd)

	Alternative 1	Alternative 2	Alternative 3
WWTP Capacity	6.10	6.10	6.10
Bonney Lake Allowance	3.36	3.36	3.36
WWTP Capacity for Sumner	2.75	2.75	2.75
Projected Wastewater Flow, 2035	4.29	4.32	4.30
Surplus/Deficit	(1.54)	(1.57)	(1.55)

Source: City of Sumner 2000, Personal communication with Mike Dahlem, City of Sumner Public Works, 2015, BERK 2015

All alternatives would increase demand for wastewater treatment and collection. With the construction of planned improvements, calculations using the Land Use Method show a projected capacity deficit of roughly 1.54-1.57 mgd in 2035.

Impacts Specific to the No Action

Under the No Action Alternative, no changes would be made to the City's wastewater service area, and the City would incur no expenses for wastewater conveyance and treatment facilities beyond those already planned. No further expansions to the WWTP would be necessary beyond the currently planned upgrades, only improvements to collection and conveyance infrastructure per adopted functional plans.

Under the No Action Alternative, the service area population could increase to 16,578. Without capacity upgrades, the WWTP would have a capacity deficit of 1.54 million gallons per day in 2035.

Impacts specific to the No Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives.

Impacts Specific to the Minimal Zoning Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. Increased capacity for population, housing and employment will result in only a slight increase in demand for sewer services compared to the No Action. East Sumner would grow at a greater level than Alternative 1 but overall City totals would be slightly higher than Alternative 1, and the WWTP capacity results are similar.

Impacts Specific to the Assertive Collaborative Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. Increased capacity for population, housing and employment will result in only a slight increase in demand for sewer services compared to the No Action. Overall City growth levels would not be significantly different than the other alternatives and therefore WWTP capacity results are similar.

Mitigation

Incorporated Plan Features

- The City's Capital Facilities Element contains goals and policies regarding wastewater systems. All alternatives would continue to include wastewater policies, and these would be updated in the Capital Facilities Element in Alternatives 2 and 3.

Applicable Regulations and Commitments

- The U.S. Environmental Protection Agency (EPA) regulates wastewater discharge under the Federal Water Pollution Control Act and the Clean Water Act. EPA administers the National Pollutant Discharge Elimination System, which requires permits for various types of discharge to streams and rivers, including treated wastewater effluent. In Washington State, EPA delegates its permitting authority to the Washington State Department of Ecology (Ecology).
- Public sanitary sewer system operations in Washington State are regulated under Chapters 35.67 and 36.94 of the Revised Code of Washington (RCW), as well as RCW Title 57.
- The City manages its sewer system under Sumner Municipal Code Title 13, Public Services.

Other Potential Mitigation Measures

- The City could implement recommendations of the City Sanitary Sewer Plan to correct existing deficiencies in the 6-year planning period.
- The City could identify additional improvements for the 20-year planning period to address deficiencies projected in the long-term.

Significant Unavoidable Adverse Impacts

Additional population, employment, and industrial/commercial growth throughout the City's service area would result in increased demands on sanitary sewer facilities. Advanced sewer system planning and capital facility planning should minimize the possibility of unavoidable impacts.

Water

Affected Environment

Citywide

The information in this chapter is primarily based upon the *2009 Water System Plan Update* (Parametrix, Inc. 2009), updated in 2010 and prepared for the City of Sumner. The City water system service area covers approximately 6,300 acres, 1,500 of which lie outside city limits. The service area is adjoined by the Bonney Lake, Valley (Alderton-McMillin), Puyallup, Pacific, Mountain View–Edgewood, and Tacoma water districts. The City of Sumner has assumed the spring supply, water rights, and customers of the Fowler Mutual Water Company, located in northwest Sumner, and portions of the Webstone Water District located outside the City of Pacific. (City of Sumner, 2010)

AVERAGE DAILY DEMAND

The City's 2009 Water System Plan establishes a planning-level estimated average demand of 171 gallons of water per capita per day for the planning period 2009 – 2029. This estimate was derived from total estimated demand for the planning period, divided by total projected population at five-year increments. While this number is useful for system-wide planning, it is based on total water consumption and therefore includes water consumed for non-residential uses. The Water System Plan also contains a breakdown of annual water consumption by land use category for the period 1997-2008. During that period, the average total annual water consumption for multifamily residential uses was 41,098,600 cubic feet (307,438,899 gallons). The City's Water System Plan estimated 2009 population at 9,881 residents, resulting average residential water consumption of 85.24 gallons per capita per day (31,114 gallons per year). For the same period, total average annual water consumption for commercial and industrial uses was 16,813,500 cubic feet (125,773,723 gallons). City employment in 2008 was estimated to be approximately 9,345 employees (ICF International, 2011), resulting in average water consumption per employee of approximately 36.87 gallons per day (13,459 gallons per year).

MAXIMUM DAILY DEMAND

The City's 2009 Water System Plan estimates peak or maximum daily demand by calculating a peaking factor from well production on historical peak days. Comparing maximum daily production to average demand for the period 1999 to 2008, the average maximum-to-average factor for the period was 1.97. The Plan therefore uses 2.0 as the estimated peaking factor.

WATER FACILITIES

The Sumner Water Utility delivers potable water through 64 miles of pipeline, five storage tanks, 3,450 meters, springs, and three wells (City of Sumner, 2013). Sumner's primary water supply comes from springs on the east hill. There are three spring fields: Sumner Springs, Crystal/County Springs, and Elhi Springs. To meet peak demand in the summer, the City also uses three wells: West Well, South Well, and Dieringer Well (City of Sumner, 2014).

The Sumner water system has five storage tanks. Four serve the Sumner service area at large, while the fifth tank is exclusively associated with the Sumner Viewpoint development. Combined storage capacity for the four primary tanks is 5.068 million gallons; including the Sumner Viewpoint tank increases capacity to 5.398 million gallons. (City of Sumner, 2010)

SOURCE EVALUATION

Sumner's water source capacity is equal to the production from its springs and wells. The 2009 Water System Plan showed total production equal to 3.72 mgd: Sumner Springs (1.15 mgd), County Springs (0.71 mgd), Elhi Springs (0.13 mgd), Dieringer Well (0.36 mgd), West Well (0.36 mgd) and South Well (1.0 mgd). Sumner's peak day demand is its required source. Subtracting source capacity from peak day demand yields source surplus/deficiency. The 2009 Water System Plan showed a surplus of 0.58 mgd in 2008, but predicted that water source would be insufficient to meet peak daily demand by the end of 2012 (City of Sumner, 2010). However, the 2009 water plan notes that "through a series of planned source improvements, new interties, new source construction and water right transfers the shortfall will

be filled and a surplus created”. The 2014 Sumner Meadows SEIS, which involved adding over 3,000 new jobs, determined there is sufficient capacity to meet demand due to the implementation of the planned water capital improvements.

MAJOR RECENT AND PLANNED IMPROVEMENTS

The City is working on expansions to existing sources, development of new interties with adjacent providers, and acquisition of additional water rights. These efforts include a 450-gallon-per-minute (gpm) intertie with the City of Pacific, a 347-gpm intertie with the Mountain View–Edgewood Water District, improvements to spring sources, and construction of a new well. Combined, these improvements could provide an additional 3.31 mgd of source capacity by 2011. (City of Sumner 2010)

The Central Well preliminary design was completed in the 2011-2012 biennium (City of Sumner, 2013) and construction is planned for the 2015-2016 biennium (City of Sumner, 2014). City staff have confirmed that as of January 2015, Central Well construction is in progress and will provide a capacity of 1,100 gallons per minute, or the equivalent of 1.58 mgd. (Personal communication with Mike Dahlem, City of Sumner Public Works, 2015) Adding this new capacity to the existing 3.72 mgd capacity provides a total of 5.30 mgd. In addition, city staff have indicated that per capita water consumption has been reduced through leak detection and repair as well as water conservation measures.

East Sumner

East Sumner is served by the City of Sumner’s water system.

Level of Service

The Sumner 2014 Comprehensive Plan Capital Facilities and Public Services Element establishes policies for level of service for the water system. This includes the following Levels of Service for water supply (Policy 1.6.1):

- Residential Demand - 60.3 gallons per day (gpd)/capita
- Employee Demand - 58.3 gpd/employee plus 252,000 gpd

While included in the 2012 Comprehensive Plan the policies have not been updated since the adoption of the Water System Plan. As described above, the Water System Plan establishes a planning-level estimated average demand of 171 gallons of water per capita per day for the planning period 2009 – 2029. This estimate was derived from total estimated demand for the planning period, divided by total projected population at five-year increments. While this number is useful for system-wide planning, it is based on total water consumption and therefore includes water consumed for non-residential uses. The Water System Plan also contains a breakdown of annual water consumption by land use category for the period 1997-2008. During that period, the average total annual water consumption for multifamily residential uses was 41,098,600 cubic feet (307,438,899 gallons). The City’s Water System Plan estimated 2009 population at 9,881 residents, resulting average residential water consumption of 85.24 gallons per capita per day (31,114 gallons per year). For the same period, total average annual water consumption for commercial and industrial uses was 16,813,500 cubic feet (125,773,723 gallons). City employment in 2008 was estimated to be approximately 9,345 employees (ICF International, 2011), resulting in average water consumption per employee of approximately 36.87 gallons per day (13,459 gallons per year).

The SEIS includes analysis based on the 85.24 gpd per resident and 36.87 gpd per employee figures, derived from the Water System Plan.

Impacts

Impacts Common to All Alternatives

Under all alternatives, increased population and employment would result in increased demand for water service, placing additional load on the current water supply system. Using the estimates of 85.24 gallons per capita per day for residential water demand and 36.87 gallons per day per employee, average daily water demand in 2035 can be estimated for each EIS Alternative (population capacity for city limits plus UGA). As discussed above, the 2009 Water System Plan uses a peaking factor of 2.0 to

estimate maximum daily demand. Comparing maximum water demand under each Alternative with Sumner's water source capacity (including the Central Well currently under construction) shows that there will be sufficient water supply to meet demand under each Alternative in 2035, as shown in Exhibit 3-78.

Exhibit 3-78. 2035 Daily Water Demand by Alternative (Gallons/Day)

Feature	Alternative 1	Alternative 2	Alternative 3
Average Daily Water Demand	2,233,805	2,264,749	2,283,136
Maximum Daily Water Demand	4,467,610	4,529,498	4,566,271
Water Source Capacity	5,304,000	5,304,000	5,304,000
Surplus/ Deficit	836,390	774,502	737,729

Source: City of Sumner 2009, Personal Communication with Mike Dahlem, City of Sumner, 2015, BERK 2015

Impacts Specific to the No Action

The No Action Alternative has slightly smaller population and employment capacity than the other Alternatives, 16,578 and 22,255 respectively. Using the water demand assumptions described above, the City will have a water supply surplus of approximately 836,000 gallons per day to meet maximum water demand.

Impacts Specific to the Minimal Zoning Action

The Minimum Zoning Action has slightly larger population capacity than Alternative 1 (16,941) and the same employment capacity (22,255). Using the water demand assumptions described above, City will have a water supply surplus of approximately 775,000 gallons per day to meet maximum water demand.

Impacts Specific to the Assertive Collaborative Action

The Assertive Collaborative Action Alternative has slightly larger population capacity than Alternative 2 (17,004) and slightly higher employment capacity (22,608). Using the water demand assumptions described above, the City will have a water supply surplus of approximately 738,000 gallons per day to meet maximum water demand.

Mitigation

Incorporated Plan Features

The City's Capital Facilities Element contains goals and policies regarding water systems, which would be updated under action alternatives.

Applicable Regulations and Commitments

- The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years.
- Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater.
- The City has adopted the *2009 Water System Plan Update* and *2010 Water System Plan Revisions*.

Other Potential Mitigation Measures

- The City could implement an aggressive water conservation program for residential, commercial and industrial users.
- The City could expand the watershed protection by acquiring additional land around the existing watershed.

- The City could implement an impact fee or other financial methods to finance improvements as recommended in the *2009 Water System Plan Update* and *2010 Water System Plan Revisions*.
- The City could establish a policy for new and/or existing businesses to use water at the average per capita employee level. Those not able to meet the goal should be encouraged to conserve, reuse water, or develop new sources.
- In conjunction with developing additional sources, the City could develop a more detailed well head and groundwater protection program.
- The City should continue efforts to complete the planned improvements to long-range water supply, including construction of physical source improvements, additional wells, and the acquisition of additional water rights.

Significant Unavoidable Adverse Impacts

Future growth in the City of Sumner and its UGA will lead to increased demand for water services, though water reuse and recycling or demand management measures could partially reduce the need for additional water supply. With the implementation of the City's planned improvements to water source capacity, no significant unavoidable adverse impacts would occur.

Stormwater

Affected Environment

Citywide

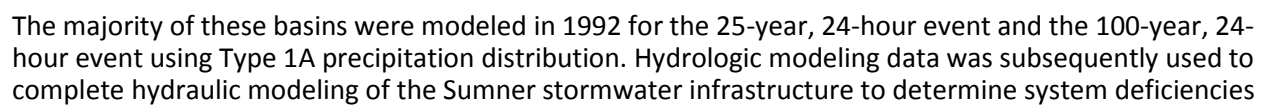
The information in this section is based on the *City of Sumner 2011 Stormwater Comprehensive Plan Update* (Parametrix Inc. 2011), which is an update to the *City of Sumner Stormwater Comprehensive Plan* adopted in 1992 and is incorporated in this study by reference. This section deals with the capacity issues associated with the physical stormwater collection and discharge system.

The Sumner Valley has historically been drained to lower the natural water table, control flooding, and create land that was more conducive for agriculture. As more intensive commercial/industrial and residential development has occurred, expansion of the stormwater system has been necessary to collect and convey stormwater to the rivers and to prevent flooding.

The purpose of the Stormwater Plan has been to project the capacity infrastructure needs and address current problems with the stormwater system. Changes in state and federal water quality regulations, stormwater retention and detention standards, and other parameters have an effect on the overall system as well as accurately anticipating what type of growth will occur.

STORMWATER MODELING

The 1992 Stormwater Comprehensive Plan identified 44 drainage basins that generate and affect stormwater flows within the city limits. These basins were further divided into 115 subbasins, as shown in Exhibit 3-79.



and identify potential capital improvement projects. The results of the modeling are contained in the 1992 Stormwater Comprehensive Plan.

The 2004 Stormwater Comprehensive Plan update included remodeling up to four of the subbasins because of a significant change of land use designation (i.e., allowable development density) between 1992 and present. Remodeling based on the 2004 land use map and allowable densities showed there was no significant increase in allowable density for developable areas located within the city limits over what was modeled in 1992.

The modeling in 1992 assumed average densities for Low Density Residential (LDR) and Medium Density Residential (MDR) zones: one dwelling unit per acre (approximately 15% impervious surface area) and four dwelling units per acre (approximately 42% impervious), respectively. These density assumptions are too low for new development based on the minimum lot sizes currently allowed in LDR and MDR zones. Based on the current allowable lot sizes, density assumptions of 30% for LDR and 48% for MDR are more appropriate. (City of Sumner 2010) Although the densities assumed for inputs in the 1992 hydrologic modeling are not suitable for current development trends, they were appropriate for development occurring before and at the time the modeling was conducted. A majority of the capital improvement projects proposing upsizing existing conveyance as part of the 2004 planning is in the “Old Town” portion of Sumner, so previous modeling is still applicable.

Modeling conducted during preliminary regional facility sizing for the capital improvement section of the 2011 Stormwater Plan was completed using the Western Washington Hydrology Model and the basin characteristics and model inputs presented in the 1992 Plan, with the exception that the LDR and MDR density assumptions were revised to more accurately represent current development trends. The modeling results for preliminary regional facility sizing are included in the 2011 Stormwater Plan Update.

STORMWATER REQUIREMENTS

The 2011 Stormwater Plan presents an overview of federal, state, county, and local regulations and policies that impact stormwater and surface water. Federal regulations include: Clean Water Act NPDES Stormwater Permits, Total Maximum Daily Loads, Safe Drinking Water Act, Endangered Species Act, and Federal Emergency Management Agency. State regulations include: Puget Sound Partnership Action Agenda, Hydraulic Project Approval, and Shoreline Management Act. County regulations include: Stream Team, and Flood Control Hazard District. Local regulations include: Surface Water Design, City of Sumner Comprehensive Plan, Critical Areas, and Development Regulations.

LOW IMPACT DEVELOPMENT

The objective of Low Impact Development methods is to mimic the predeveloped site hydrology by using site design techniques that store infiltrate, evaporate, and detain runoff. Since every aspect of site development affects hydrologic patterns the site, LID control techniques focus mainly on site hydrology. If LID techniques can be used, the net result will be to more closely mimic the watershed’s natural hydrologic functions. This can have a benefit to receiving waters by maintaining base flows, a more closely approximating the natural condition that are good for fish and wildlife using the streams and rivers.

In 2009, the City adopted a Comprehensive Plan text amendment, updating policies related to Low Impact Development. This amendment was intended to ensure that the City’s policies reflect the evolving state of science related to LID and are consistent with updated information included in Ecology’s 2005 Stormwater Manual. These updated goals and policies are contained in the City’s Comprehensive Plan Environment Element, and include the following policies relevant to stormwater:

- **Policy 1.4.6** – The City of Sumner will continue to be a leader in developing and implementing state-of-the-art stormwater management techniques including low impact development (LID).
- **Policy 1.4.7** – Low impact development techniques will be encourages for both private and public developments including retention of native vegetation, soil amendment, rainwater harvesting, pervious pavement and bio-retention.

- **Policy 1.4.8** – Incorporate low impact development principles and practices into the design, construction, and operation of all city facilities and city-funded projects only when economically feasible.
- **Policy 1.4.9** – Work with residential and commercial developers to incorporate low impact development that preserves a site’s natural hydrologic functions and practices that protect native vegetation and soils, facilitate reuse of resources, such as reclaimed water, and reduce impervious surface.
- **Policy 1.4.10** - Identify and evaluate potential changes to land use development regulations and building codes to support and promote low impact development.

The City of Sumner has Ecology’s 2005 Stormwater Manual (Sumner Municipal Code Chapter 13.48) and requires documentation of LID practices in each project subject to the manual. The City states that stormwater site plans shall be prepared with a requirement for LID practices over standard retention/detention facilities. (City of Sumner 2010)

CAPITAL IMPROVEMENT PROJECTS

The City’s 2011 Stormwater Comprehensive Plan Update presents a summary of capital improvement projects proposed to alleviate existing and future infrastructure deficiencies and increase the water quality of stormwater discharged to receiving waters (City of Sumner, 2011). The 1992 Stormwater Comprehensive Plan identified 34 capital improvement projects; these have all been either been incorporated into a different project, completed, or are no longer necessary. The 2011 Plan summarizes the status of the projects from the 1992 Plan.

The 2011 Stormwater Plan includes a table summarizing each proposed capital improvement project, including priority, scheduled completion date, and estimated construction cost in 2010 dollars and at the time of completion, and a site map showing the locations of proposed projects. There are a total of 46 capital improvement projects identified in the project list. The projects have been scheduled based on a high, medium, or low priority. Projects prioritized as high, medium, and low are scheduled for completion in 0 to 5 years, 5 to 10 years, and 10 to 15 years, respectively. The total estimated cost for these projects at time of construction completion is \$70,195,600, in 2010 dollars. The projects have been prioritized based on urgency and to balance the annual cost. The cost per year ranges from \$440,700 to \$13,243,600. City staff have indicated that a number of stormwater projects have been completed since the 2011 Plan was published, including a detention vault at 160th Avenue, new stormwater facilities at 64th Street in East Sumner, and a Puyallup Street retrofit. (Personal Communication with Mike Dahlem, City of Sumner Public Works, 2015).

REGIONAL STORMWATER FACILITIES

Prior to the 2011 Stormwater Plan, ten sites were identified within the Sumner city limits as potential sites for the construction of regional stormwater flow/water quality control facilities. The 2011 Plan provides a summary and update on each project. Of the ten projects, seven were removed from the list, while one project is listed as completed.

LEVEL OF SERVICE

The Capital Facilities Element of the City’s 2012 Comprehensive Plan contains policies relating to level of service for stormwater drainage. Objective 1.7.1 states “Establish and maintain the Level of Service as the 25-year storm event, except in those areas where the 100-year storm design is appropriate to protect the natural environment.”

East Sumner

The East Sumner Neighborhood currently has a moderate amount of development with large areas of open space and wetlands. Stormwater is currently managed via natural infiltration in open space areas

and stormwater infrastructure within the street system. Due in part to the wetland system that exists in the neighborhood the area has a high water table that makes development more challenging and may limit opportunities for implementing low impact development. In addition, the wetland system and high water table may increase the risk of flooding in the area even though they are not within mapped floodplain areas. Existing and planned regional stormwater facilities in East Sumner will address the challenges described above by creating centralized facilities for stormwater detention and regional rather than relying on stormwater collection and treatment on each individual site.

Impacts

Impacts Common to All Alternatives

CITYWIDE

Additional growth and development will increase the amount of impervious surfaces and the level of stormwater runoff under all of the alternatives. Since the relatively minor differences in growth capacity between the alternatives is attributable primarily to mixed-use urban areas the increased growth capacity will not necessarily translate into greater amounts of impervious surfaces since additional growth will likely be accommodate through greater building heights. The most increases in impervious surfaces will be especially pronounced in areas where the current land use is predominantly agricultural, vacant, or natural (vegetated) (City of Sumner, 2010).

A projection of the maximum new impervious surface area created under each Alternative is shown in Exhibit 3-80. These estimates were created using Pierce County buildable lands data for estimates of total critical areas, then applied citywide.

Exhibit 3-80. Projected Maximum New Impervious Surface Area by Alternative (City & UGA)

	Alternative 1	Alternative 2	Alternative 3
Impervious Surface Acres	2,089.7	2,105.1	2,111.4

Source: City of Sumner, 2014; BERK Consulting, 2015

EAST SUMNER

All three alternatives would result in increases in impervious surfaces with a greater amount under Alternative 3 where filling of wetlands and offsite mitigation are anticipated. District stormwater facilities are planned under all three alternatives to accommodate increased development. Alternative 3 includes wetland mitigation for development in East Sumner consisting of an off-site wetland mitigation bank. Wetland mitigation would have to occur in a collective offsite location, likely on public property. If there is insufficient room on the City-owned property on the central block along Salmon Creek, another option is the City-owned AG zoned property west of the BNSF Railroad Tracks and south of 24th Street.

Impacts Specific to the No Action

Under the No Action Alternative, it is projected than a maximum of 2,089.7 acres of new impervious surface will be created.

Impacts Specific to the Minimal Zoning Action

Under the No Action Alternative, it is projected than a maximum of 2,105.1 acres of new impervious surface will be created.

Impacts Specific to the Assertive Collaborative Action

Under the No Action Alternative, it is projected than a maximum of 2,111.4 acres of new impervious surface will be created. The intensity of development and build out in East Sumner is anticipated to be greater under Alternative 3 due to the significant public improvements that are planned by the City. The off-site wetland mitigation bank planned under Alternative 3 will facilitate the development of existing

wetlands in East Sumner and will likely result in greater amounts of impervious surface in East Sumner compared to other alternatives.

Mitigation Measures

Incorporated Plan Features

- All alternatives retain buffers along rivers, streams, and wetlands.
- LID is an innovative approach to stormwater quantity and quality control that mimics the predeveloped hydrology of a project site by using site design techniques that store, infiltrate, evaporate, and retain stormwater runoff. In 2009, the City adopted Comprehensive Plan amendments to require LID through incentives and evaluation of the Sumner Municipal Code for opportunities to facilitate LID (City Sumner 2009). All alternatives retain these goals and policies.
- District stormwater facilities identified in City capital plans would help accommodate development in the East Sumner Neighborhood. City investments regarding roads, wetlands, and stormwater are more defined under Alternatives 2 and 3 in the East Sumner Neighborhood Plan Update.

Applicable Regulations and Commitments

- Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls.
- The City has adopted stormwater standards requiring, among other things, 25-year storage with the 2-year predevelopment release rate.
- Through Chapter 13.48 SMC, the City applies 2005 Ecology stormwater standards to new development of public and private improvements. The City states that stormwater site plans shall be prepared with a requirement for LID practices over standard retention/detention facilities. The City requires documentation of LID practices in each project subject to stormwater requirements.
- The City should implement the capital improvement projects described in the 2011 Stormwater Comprehensive Plan.
- The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program.

Other Potential Mitigation Measures

- Subsequent to amendment of its Comprehensive Plan, the City could either conduct an update of its Stormwater Comprehensive Plan to account for the additional impervious surfaces allowed under the action alternatives or, based on its adopted stormwater regulations, the City could ensure that development allowed under land use alternatives demonstrates compliance with the standards set forth in the Ecology's 2005 Stormwater Manual as adopted by the City.
- The City could fund more public education on water quality for residents and businesses.
- The City will be required to apply the 2012 Ecology Stormwater Manual by 2016 as part of its NPDES compliance program. The City could apply this manual in advance of 2016 in the East Sumner Neighborhood as part of the Planned Action Ordinance in the interim.

Significant Unavoidable Adverse Impacts

Increased development under all alternatives would increase impervious surface and reduce vegetation. These changes would have impacts on the stormwater system in the study area and the natural recharge of groundwater. Aggressive implementation of LID measures and application of NPDES-compliant stormwater standards and improvements would reduce impacts and meet City level of service standards.

Solid Waste

Affected Environment

Citywide

Pierce County contracts with Waste Connection, Inc., a collection of subsidiary waste disposal companies, to provide waste collection services. DM Disposal currently provides garbage collection services within Sumner city limits; and Murrey's Disposal Company and American Disposal collect garbage in the unincorporated portions of Pierce County around Sumner (Murrey's Disposal 2010; City of Sumner 2014).

In the County, transfer facilities are used to transfer waste from self-haulers or route collection vehicles to large capacity containers, which are then transported to a waste disposal site. Transfer facilities include publicly and privately owned transfer stations, drop-box transfer stations, moderate-risk waste fixed and mobile facilities, and an intermodal facility. There is also a privately owned transfer and recycling facility at the site of the closed Hidden Valley Landfill, which offers covered drop-off for residential garbage and is capable of sorting operations, which separate landfill materials from recyclables.

Currently, all solid waste collected by waste management systems in Pierce County is disposed of at the privately owned LRI landfill south of Graham on State Route 161. LRI also operates a compost factory and gas-to-energy plant (Pierce County 2008).

The 19 cities using the Pierce County disposal system have adopted and implemented recycling collection programs similar to the minimum service levels established by the County. The City of Sumner offers two separate recycling programs: one for yard waste and one for comingled recyclables (excluding glass). DM Recycling Company, a subsidiary of Waste Connections, provides recycling collection services throughout Pierce County, including within the current plan area. Curbside pick-up for recycling and yard waste is organized on a biweekly schedule (Murrey's Disposal 2010).

PIERCE COUNTY SOLID WASTE MANAGEMENT PLAN

The *Tacoma–Pierce County Solid Waste Management Plan*, developed as the planning tool for the management of solid waste activities in Pierce County over the next 20 years, was adopted in 2000 (Pierce County 2000). A supplement to the plan was published in 2008 and contains amended goals and policies for achieving the 20-year vision expressed in the 2000 plan. A scheduled update of the Plan was put on hold effective May 31, 2013 (Pierce County 2014).

The Solid Waste Management Plan maintains an inventory of all existing solid waste handling facilities, identifies potential disposal and recycling facility needs, and assesses disposal capacity needs based on 20 years of population growth for all participating jurisdictions. The plan's goals, policies, and recommendations provide elected officials with guidelines for the development of programs, capital facilities, and annual budgets. The plan provides a legal basis for Tacoma, Pierce County, the Tacoma–Pierce County Health Department, other jurisdictions, and government agencies to make permitting decisions on solid waste or recycling facilities. The plan addresses solid waste management in all unincorporated and incorporated areas of Pierce County (Pierce County 2000).

EXISTING WASTE STREAM

According to Ecology, municipal solid waste (MSW) disposed annually in Pierce County has declined from 633,145 tons in 2008 to 544,064 tons in 2012, while the population has grown, thus lowering the per capita disposal rate from 4.42 pounds per day in 2008 to 3.67 pounds per day in 2012, as shown in Exhibit 3-81. Pierce County's goal is to reduce waste disposal to 1.09 pounds per person per day in 2032 (Pierce County 2008).

Exhibit 3-81. Pierce County Disposed Waste, 2008-2012

Year	Disposed Tonnage of Municipal/ Commercial Solid Waste	County Population	Per Capita Disposal Rate (pounds/day)
2008	633,145	785,639	4.42
2009	576,194	796,836	3.96
2010	577,744	795,628	3.98
2011	529,433	807,904	3.59
2012	544,064	811,681	3.67

Source: 2014, Office of Financial Management, BERK 2014

Applying the average Pierce County per capita MSW disposal rate for the period 2008-2012, 3.92 pounds per day, to Sumner's 2010 population of 9,451, the MSW collected in Sumner in 2010 was approximately 37,087 tons.

East Sumner

East Sumner is located inside the City of Sumner city limits and is covered by the Pierce County Solid Waste Management Plan.

Impacts

Impacts Common to All Alternatives

As described under Affected Environment, solid waste collection in Sumner is provided by private haulers under franchise agreement with the City of Sumner. Development in the city limits under all alternatives would increase the amount of solid waste generated and directed to regional landfills and recycling and composting centers. As stated under Affected Environment, residential solid waste and recycling collection services are available upon request throughout Sumner. Commercial and industrial businesses would likely contract privately for waste collection. No significant adverse impacts to solid waste are anticipated under any of the alternatives.

We can project the total municipal solid waste disposed in Sumner in 2035 under the population assumptions of each Plan Alternative. As noted above, the 2008 Pierce County Solid Waste Plan assumes a per capita MSW disposal of 4.5 pounds per day. This is significantly higher than the five-year average per capita MSW disposal rate of 3.92 pounds per day. Both sets of figures are shown in Exhibit 3-82.

Exhibit 3-82. Sumner Daily Solid Waste Disposal in 2035, By Alternative (in pounds)

	Alternative 1	Alternative 2	Alternative 3
Historic rate (3.92 lbs/day)	64,986	66,409	66,656
Pierce County Plan rate (4.5 lbs/day)	74,601	76,235	76,518

Source: Ecology 2014, Pierce County 2008, BERK 2014

Impacts specific to the No Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. Alternative 1 has the least amount of waste but is similar to the other alternatives.

Impacts Specific to the Minimal Zoning Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. Alternative 2 has a moderate level of solid waste increase compared to Alternatives 1 and 3. East Sumner as a share of the total growth would slightly increase demand for solid waste services.

Impacts Specific to the Assertive Collaborative Action

Impacts for this alternative are generally consistent with the impacts common to all alternatives. Alternative 3 would have the highest demand for solid waste services, but is very similar to the other alternatives. Demand for solid waste service in the East Sumner Neighborhood may increase as development occurs and would have the highest share of the growth compared to the three alternatives.

Mitigation

Incorporated Plan Features

Under all alternatives, the Utilities Element of the City Comprehensive Plan provides solid waste policies related to the provision of solid waste collection and disposal services and supporting recycling and waste reduction programs consistent with the Solid Waste Management Plan. Alternatives 2 and 3 would update the Element policies.

Applicable Regulations and Commitments

The City participates in an interlocal agreement with Pierce County for solid waste and recycling services.

Other Potential Mitigation Measures

The City could support added public outreach efforts to increase awareness of recycling programs.

Significant Unavoidable Adverse Impacts

As population growth occurs, the amount of solid waste generated will increase, resulting in increased demand on the County's disposal system. Unavoidable impacts are not anticipated due to the countywide coordination of solid waste and recycling programs.

Utilities

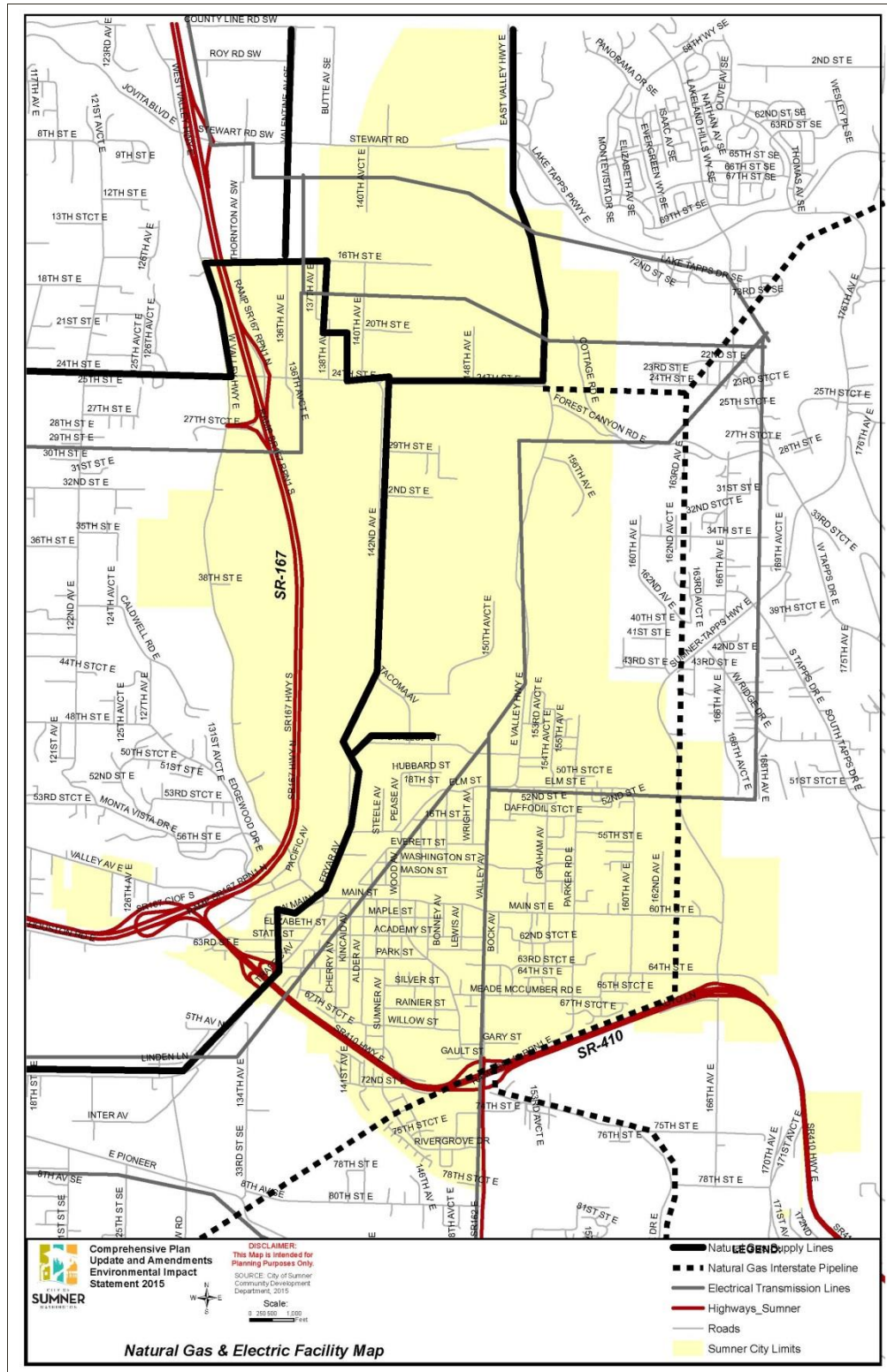
Affected Environment

Citywide

POWER AND NATURAL GAS

Puget Sound Energy (PSE) provides both electric and natural gas services in Sumner. PSE is the oldest local energy provider in Washington and maintains nearly 2,400 miles of electric distribution lines and nearly 2,500 miles of natural gas pipeline in Pierce County. While natural gas is a non-essential utility, the Washington Utilities and Transportation Commission (WUTC) requires providers of electricity to provide service on demand in support of growth that occurs in their service areas. As such PSE conducts its own ongoing capacity planning process to ensure their power supply and infrastructure are adequate to meet anticipated future needs. Exhibit 3-83 generally depicts the location of natural gas and electric facilities.

Exhibit 3-83. Natural Gas and Electric Facility Map



Source: City of Sumner, 2015

TELECOMMUNICATIONS

Telephone service in Sumner is provided by CenturyLink (formerly Qwest Communications), who owns a main feeder line in Fryar Avenue in western Sumner and a primary feed line along the BNSF railroad that runs along the eastern boundary of the golf course property. CenturyLink commonly co-locates its

facilities, including both underground and aerial lines, with the facilities of electric power providers, such as Puget Sound Energy. The BNSF right-of-way is also the location of a Sprint fiber optic line for high-speed data transfer. Telecommunication providers, such as CenturyLink and Sprint, provide their services upon demand from consumers and engage in their own capacity planning processes to ensure that they have adequate facilities to accommodate future growth in their service areas. In addition, providers of essential utilities, such as landline telephone service, are required by the Washington Utilities and Transportation Commission (WUTC) to regularly evaluate the capacity of their facilities.

East Sumner

East Sumner is served by the same natural gas, electricity, and telecommunications infrastructure and services as the rest of the plan area.

Impacts

Impacts Common to All Alternatives

Population growth under any of the alternatives will result in increased demand for utility services.

Under all alternatives, development in the study area will increase the consumption of electricity and natural gas, though the precise level of consumption will vary based on the specific uses developed. Both electric power and natural gas are readily available in the study area, and PSE conducts continuous resource planning to ensure adequate energy supply within its service area. No significant impacts associated with Power and Natural Gas are anticipated under any of the Alternatives.

A variety of telecommunications services are available in the study area. While development in the area would likely require additional installation of telecommunication infrastructure (phone lines, fiber optic cables, etc.), these are private facilities owned and operated by private service providers. The cost for these system improvements would be borne by the individual service providers, and no significant impacts associated with Telecommunications are anticipated under any of the Alternatives.

Impacts specific to the No Action

As this Alternative has the lowest population capacity, impacts would be slightly less than under other Alternatives.

Impacts Specific to the Minimal Zoning Action

Population capacity and expected impacts under this Alternative would be slightly more than Alternative 1 and less than Alternative 3. Demand for utility service in the East Sumner Neighborhood may increase as development occurs.

Impacts Specific to the Assertive Collaborative Action

Population capacity and expected impacts under this Alternative would be slightly higher than for Alternatives 1 and 2. Demand for utility service in the East Sumner Neighborhood may increase as development occurs.

Mitigation

Incorporated Plan Features

- The *City of Sumner Comprehensive Plan* Utilities Element that guides coordination between the City and service providers. Alternatives 2 and 3 would update this element.

Applicable Regulations and Commitments

- The City should continue to implement the Washington State Energy Code.

Other Mitigation Measures

- Consistent with City policies, the City should provide annual updated population, employment and development projections to Puget Sound Energy so they can evaluate actual patterns and rates of growth, and compare these patterns to electrical demand forecasts.

- The City could coordinate and cooperate with other jurisdictions in the implementation of multi-jurisdictional electric utility facility additions and improvements.

Significant Unavoidable Adverse Impacts

Additional population and employment growth will increase the demand for electricity, natural gas, and telecommunication services. The City's coordination with service providers along with mitigation measures should allow for increased demand to be met. Significant, unavoidable or adverse impacts are not anticipated.

3.10 Parks and Recreation

Affected Environment

Citywide

Existing Facilities

Parks

The City of Sumner has a long tradition of providing quality and well-maintained parks. The *Sumner Parks and Open Space Plan*, which accompanied the *1994 City of Sumner Comprehensive Plan*, provided a 20-year guideline for the planning, development, and maintenance of parks within the city. A plan supplement, adopted in 2000, reviewed the City's progress toward meeting the goals set forth in the 1994 plan and updated its inventory of facilities, existing levels of service, and capital improvement plan.

In 2014 the City drafted a Phase 1 Update to its Parks and Open Space Plan. This is the first portion of a two-phase plan update and includes an updated parks and open space inventory. Phase II will include parks and open space goals, levels of service, new amenities, targeted new locations, and recommendations for funding improvements and revenues.

The City's parks properties range in size from less than one acre to approximately 11 acres, as shown in Exhibit 3-84. In 2014 the City surplused the Sumner Meadows golf course, a 150-acre parcel located at the northeast corner of the City, at 14802 Golf Links Drive. The site is planned for light industrial uses, as allowed by current zoning. The City's park facilities are shown in Exhibit 3-85.

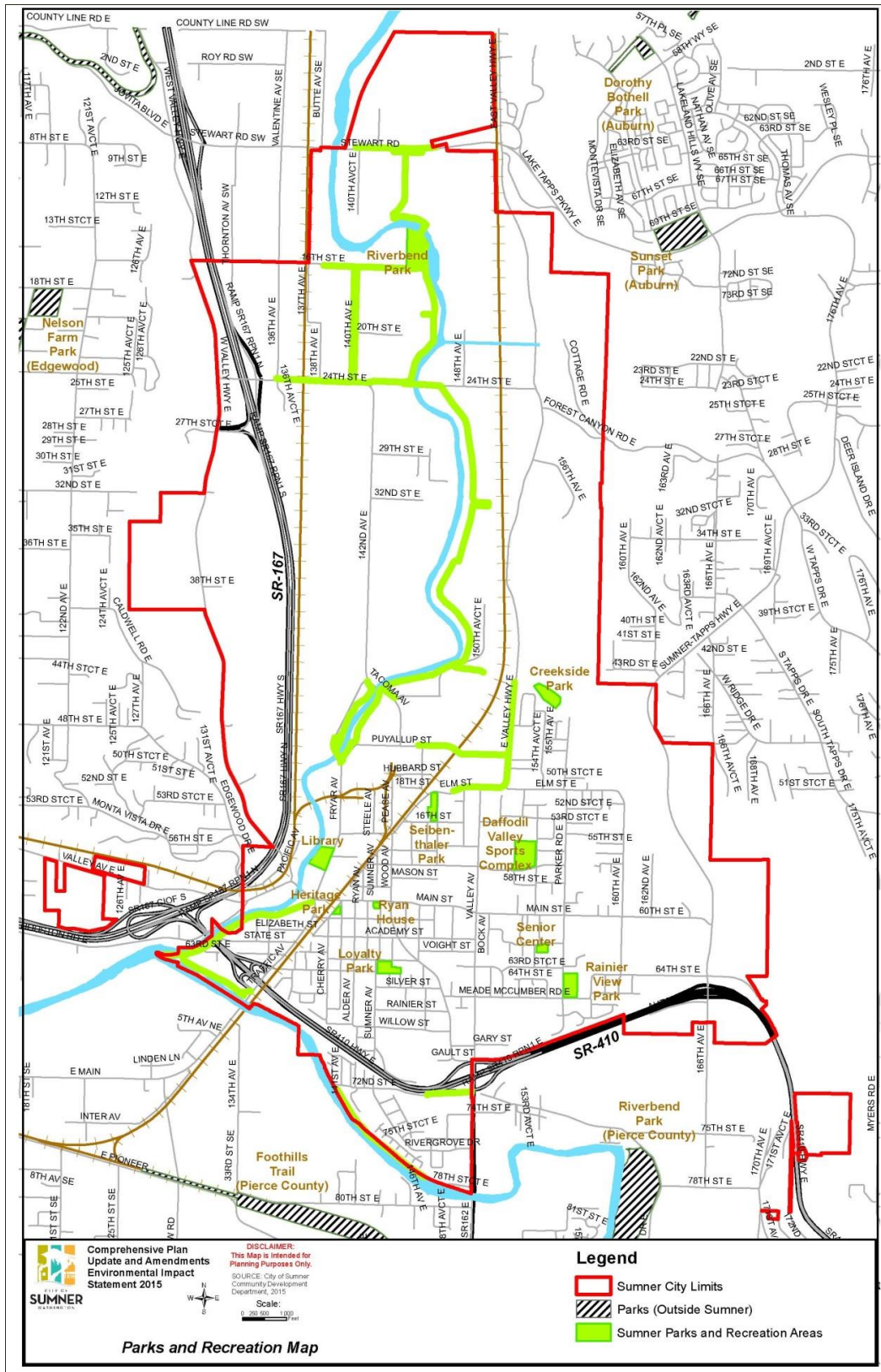
Exhibit 3-84. Summary of Current City Park Spaces

Park Areas and Facilities	Acres
Improved Community Parks:	
Loyalty	2.6
Seibenthaler	2.0
Heritage	0.5
Rainier View Park	4.0
<i>Subtotal</i>	9.1
Unimproved Community Parks:	
Riverbend Park	6.6
Salmon Creek Park	6.4
<i>Subtotal</i>	13.0
Regional Parks:	
Sports Complex	11.2
<i>Subtotal</i>	11.2
Waterfront Parks:	
Library Park	0.5
<i>Subtotal</i>	0.5
Special Use Areas¹	
Ryan House	0.4
Senior Center	1.0
<i>Subtotal</i>	1.4
Beautification Sites	
	1.5
Total City Park Land	36.7
School District Recreation Facilities	14.5
Total Park Space	51.2

Source: City of Sumner 2015, BERK 2015

¹ Special use areas include miscellaneous sites that do not fit another category.

Exhibit 3-85. Park Inventory Map



Source: City of Sumner 2015

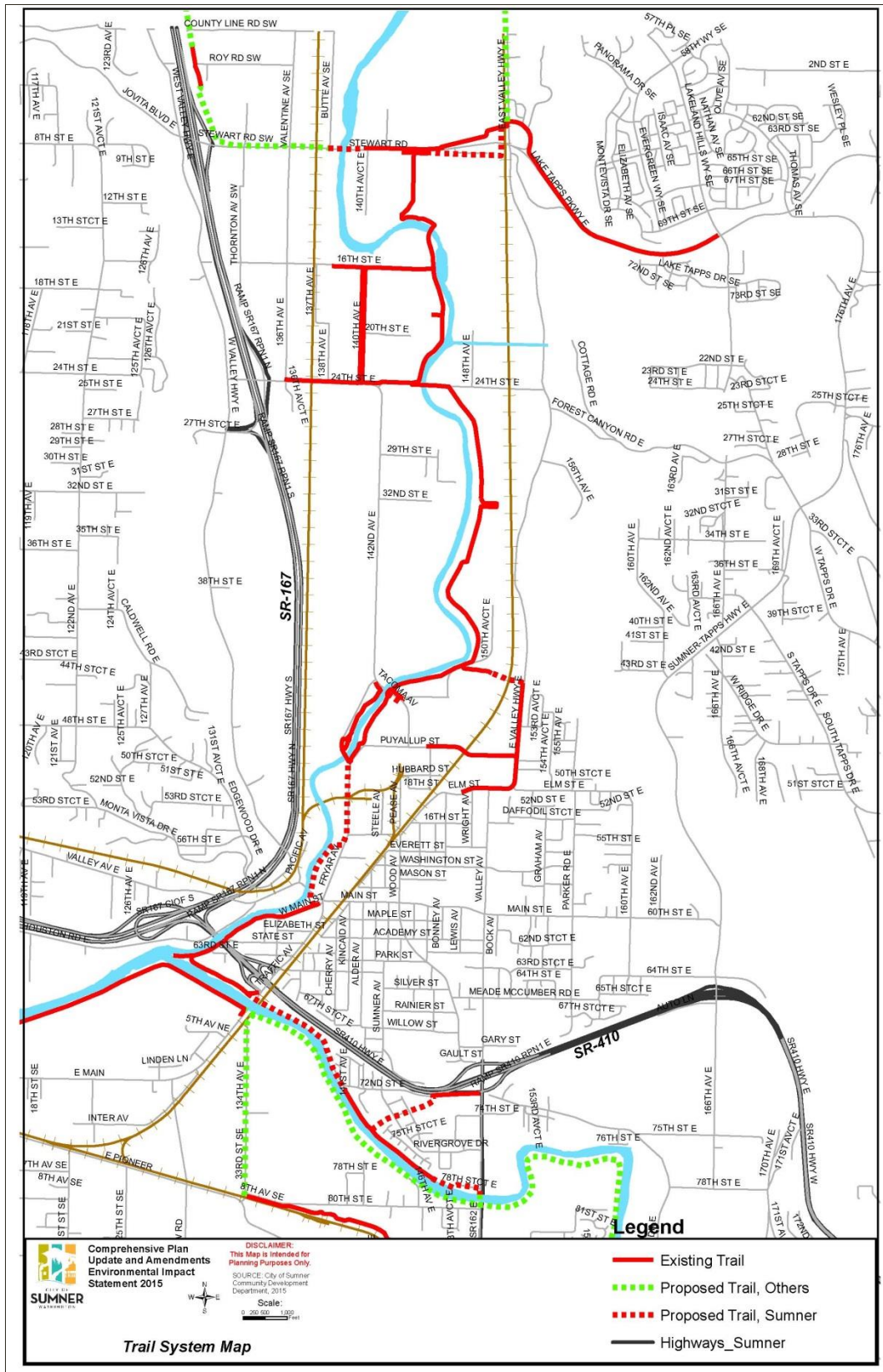
Trails

In 1996, the cities of Sumner and Pacific completed the *Sumner/Pacific Trail Master Plan*, which was incorporated into the *Parks and Open Space Plan*. The City updated this plan in June 2008 with revised trail maps, cost estimates, and environmental goals. The 2008 update focused on facilities within the city limits and was not a joint effort with the City of Pacific. A map of the proposed trail system from the *Trail Master Plan* is shown in Exhibit 3-86. The plan outlines a trail system that links the City to other regional trails and serves the needs of City residents.

As of 2010, construction of the planned City trail system consists of nine discrete projects, split into two phases. These planned projects are concentrated in the northern part of the city limits, near the connection to the City of Pacific's trail system, and along the White River, northwest of downtown.

The White River Trail Extension was construction during the 2011-2012 biennium (City of Sumner 2013). In 2014, the Sumner Link Trail opened. This eight-mile paved trail follows the White River through the north valley of Sumner and includes two pedestrian bridges that cross the White River. This trail links to the Interurban Trail and Lakeland Hills Trail on the north and the Foothills Trail and Riverwalk Trail to the south.

Exhibit 3-86. Sumner Trail System



Source: City of Sumner GIS 2014, BERK 2014

Private Recreation

For many years the only major private recreational facility in the Sumner area was the Mel Korum YMCA located on Puyallup's South Hill. Opened in 2000, it is the largest YMCA in the south Puget Sound area; it has over 9,000 members and numerous indoor and outdoor athletic facilities. In 2013, the YMCA of Pierce and Kitsap Counties broke ground on a new facility located at the intersection of 64th Street East and 160th Ave East in Sumner. The facility, named the Gordon Family YMCA, is expected to open in 2015 and will be about 110,000 square feet and cost approximately \$35 million. An estimated 22,000 people are expected to join the YMCA when it opens and 3,000 people per day (YMCA of Pierce and Kitsap Counties, 2014).

Level of Service

Level of service (LOS) for parks is usually defined as people per facility or acre of park land. A community will typically define the types of facilities (e.g., basketball courts, soccer field, picnic tables) that it wishes to maintain without impact from new growth. LOS may be based on residential population or employment population. The Sumner Parks and Open Space Plan (2000) adopted required LOS for park and recreation facilities, shown in Exhibit 3-87.

The 2010 Comprehensive Plan Update EIS examined existing (then) levels of service for parks and recreation facilities. The analysis found the following deficiencies:

- Soccer fields: 2.2 fields;
- Volleyball courts: 0.1 court;
- Community park land (1.4 acres);
- Picnic tables (23.6);
- Picnic shelter gazebo at Rueben Knoblauch Heritage Park (1.1); and
- Regional park land (3.7 acres).

However, this analysis was based on a population estimate of 10,404 for 2008, substantially higher than the U.S. Census estimate of Sumner's population in 2010, 9,451. Exhibit 3-87 shows adopted and existing LOS, based on the 2014 population estimate of 9,545. This analysis shows the following deficiencies:

- Soccer fields: 1.8
- Community park land: 0.5 acres
- Urban trails: 1.3 miles
- Picnic tables: 6.2
- Picnic shelter gazebo: 0.1
- Children's play area: 0.6
- Regional park land: 2.4 acres

Exhibit 3-87. Adopted and Existing Park and Recreation Level of Service

Activity	Required LOS	Existing Number	Location	Existing LOS	Surplus/Deficit
Softball	1/2,000	7	Sports Complex, Maple Lawn, Junior High, High School	1/1,364	2.2
Baseball	1/5,000	5	Sports Complex, High School, Junior High	1/1,909	3.1
Soccer Fields	1/2,000	3	Sports Complex, Junior High, Seibenthaler	1/3,182	-1.8
Football Fields	1/20,000	1	High School	1/9,545	0.5
Tennis Courts	1/3,000	8	Sports Complex, Junior High, High School	1/1,193	4.8
Basketball Courts	1/1,000	13	Sports Complex, Loyalty Park, Maple Lawn, Junior High, High School, Daffodil Valley, Bob Miller, Seibenthaler	1/734	3.5
Volleyball Courts	1/5,000	2	Sports Complex, Maple Lawn	1/4,773	0.1
Indoor Pool	1/20,000	1	High School	1/9,545	0.5
Community Parks	1 acre/1,000	9 acres	Loyalty, Seibenthaler, Heritage, Eastside	1 acre/1,061	-0.5
Urban Trails	0.95 mile/1,000	7.8 miles	Sumner Link Trail and widened sidewalk for bike/ped access	0.82 mi/1,000	-1.3
Picnic Shelter/Gazebo	1/8,500	2	Heritage	1/4,773	0.9
Picnic Tables	1/250	32	Loyalty, Sports Complex, Heritage, Library Complex	1/298	-6.2
Horseshoes	None	2	Loyalty	1/4,773	N/A
Children's Play Area	1/1,700	5	Loyalty(2), Seibenthaler, Maple Lawn, Sports Complex	1/1,909	-0.6
Community Center	None	0	—	NA	N/A
Golf Course	None	0	—	NA	N/A
Regional Park	1 acre/710	11 acres	Sports Complex	1 acre/868	-2.4

Source: City of Sumner 2015, BERK Consulting 2015

Recreation

Recreation services for City residents are provided by the Sumner–Bonney Lake Parks and Recreation Program. A tri-party collaboration between the City, Sumner School District, and city of Bonney Lake, the program is part of the school district's Community Services Program, which oversees the administration of the public swimming pool, performing arts center, and recreation programs. The 2009-2010 budget for the Community Services Program is \$1.34 million. A staff of five, who receive supervision from the school district, provides youth and adult leagues, special populations programs, sports leagues, community education, preschool and home-school programs, teen adventure programs, special events, and tournaments. (Sumner School District, 2009)

East Sumner:

No park and recreation facilities currently exist in the East Sumner Neighborhood although several park facilities are located in close proximity. As discussed previously a new YMCA facility is currently under construction in the East Sumner Neighborhood. The City owns approximately 6.4 acres along Salmon Creek between 60th and 64th Streets East. Based on the *East Sumner Neighborhood Plan*, the area will be used for a passive park, wetlands mitigation for development in the area, stormwater detention, stream restoration and flood control. The *City of Sumner Comprehensive Plan* calls for additional land to

be purchased and for the removal of the 60th Street East road crossing and the construction of a new crossing on the future 62nd Street East. (City of Sumner, 2010).

Impacts

Impacts Common to All Alternatives

Under the Alternatives under consideration in this study, the population of the plan area is anticipated to grow from approximately 9,545 in 2014 to a capacity of between 16,578 (Alternative 1) and 17,004 (Alternative 3) in 2035. Increases in population would result in an increased demand for parks and recreational facilities. Impacts on these facilities would be proportionate to the amount of population increase, and each alternative would result in some LOS deficiencies if additional parks and recreation resources are not acquired, as shown in Exhibit 3-88.

Exhibit 3-88. Park and Recreation 2035 Level of Service, By Alternative

Activity	Required LOS	Existing Number	Alternative 1 LOS	Alt 1 Surplus/Deficit	Alternative 2 LOS	Alt 2 Surplus/Deficit	Alternative 3 LOS	Alt 3 Surplus/Deficit
Softball	1/2,000	7	1/2,368	-1.3	1/2,240	-1.5	1/2,429	-1.5
Baseball	1/5,000	5	1/3,316	1.7	1/3,388	1.6	1/3,401	1.6
Soccer Fields	1/2,000	3	1/5,526	-5.3	1/5,647	-5.5	1/5,668	-5.5
Football Fields	1/20,000	1	1/16,578	0.2	1/16,941	0.2	1/17,004	0.1
Tennis Courts	1/3,000	8	1/2,072	2.5	1/2,118	2.4	1/2,126	2.3
Basketball Courts	1/1,000	13	1/1,275	-3.6	1/1,303	-3.9	1/1,308	-4.0
Volleyball Courts	1/5,000	2	1/8,289	-1.3	1/8,471	-1.4	1/8,502	-1.4
Indoor Pool	1/20,000	1	1/16,578	0.2	1/16,941	0.2	1/17,004	0.1
Community Parks	1 acre/1,000	9 acres	1/1,842	-7.6	1/1,882	-7.9	1/1,889	-8.0
Urban Trails	0.95 mi/1,000	7.8 miles	0.47mi/1,000	-7.9	0.46mi/1,000	-8.3	0.46mi/1,000	-8.4
Picnic Shelter/Gazebo	1/8,500	2	1/16,578	0.0	1/16,941	0.0	1/17,004	0.0
Picnic Tables	1/250	32	1/921	-34.3	1/941	-35.8	1/945	-36.0
Horseshoes	None	2	1/8,289	N/A	1/8,471	N/A	1/8,502	2.0
Children's Play Area	1/1,700	5	1/3,316	-4.8	1/3,388	-5.0	1/3,401	-5.0
Community Center	None	None	0	N/A	N/A	N/A	N/A	N/A
Golf Course	None	None	0	N/A	N/A	N/A	N/A	N/A
Regional Park	1 acre/710	11 acres	1/1,507	-12.3	1/1,540	-12.9	1/1,546	-12.9

Source: City of Sumner 2010, BERK Consulting 2015

East Sumner

Growth in East Sumner to implement the City's vision for an urban village will increase the demand for neighborhood park facilities and amenities.

Impacts Specific to the No Action

Under the No Action Alternative, the City would have a deficit of several facility types, including softball fields, soccer fields, basketball courts, volleyball courts, community parks, urban trails, picnic tables, children's play area, and regional park space, unless new park and recreation facilities are acquired.

Impacts Specific to the Minimal Zoning Action

The Minimal Zoning Action Alternative has higher population capacity and therefore a slightly higher deficit of parks and recreation facilities than the No Action Alternative.

Impacts Specific to the Assertive Collaborative Action

Under the Assertive Collaborative Action Alternative, the City would have a slightly higher deficit of park and recreation facilities than the other Alternatives. The demand for park resources in the East Sumner neighborhood will increase as development occurs. However, in addition to the new YMCA facility currently under construction, new open space and trail amenities are planned as part of the Assertive Collaborative Action Alternative.

Mitigation Measures

Incorporated Plan Features

- The City Comprehensive Plan contains a Parks and Open Space Element including goals and policies guiding parks and recreation services and facilities. Alternatives 2 and 3 would add a policy recommending update of the City's *Parks and Open Space Plan*.
- Alternative 2 would allow new open space and trail improvements in the East Sumner Neighborhood, while Alternative 3 includes assertive action to implement these improvements in East Sumner.

Applicable Regulations and Commitments

- The City collects a SEPA mitigation fee for parks and trails as follows:

Exhibit 3-89. Park and Trail: SEPA Mitigation Fees

	Residential Fee per Dwelling Unit	Commercial/Industrial Fee per Employee
Park Mitigation Fee	\$214	\$91
Trails Mitigation Fee	\$204	\$86

Source: City of Sumner 2014

Other Potential Mitigation Measures

- RCW 36.70A.070(8), adopted in 2002, requires that cities planning under the Growth Management Act, prepare Parks and Recreation Elements. The implementation of this RCW provision was held in abeyance until such time as adequate funding and time was provided by the state to local jurisdictions. The City Comprehensive Plan includes a Parks and Open Space Element that partially complies with these provisions of the RCW. Should the requirement be funded by the state, the City would need to update and revise the *Parks and Open Space Plan*.
- The City is in the process of updating the *Parks and Open Space Plan* to remain current for planning, design, and grant purposes. This review will include a review of the LOS standards for future growth.
- The City could pursue more aggressive grant and bond financing for parks and trails projects.
- The City could develop a policy and corresponding program to protect estate properties from development.
- The City could develop a park and trail impact fee following adoption of a *Parks and Open Space Plan Update*.

Significant Unavoidable Adverse Impacts

Anticipated growth under all the plan alternatives will increase the demand for recreational facilities in the City of Sumner and impact the City's ability to meet the established LOS standards. The City will need to implement the identified mitigation measures to ensure adequate park and recreation facilities to serve the City of Sumner.

3.11 Transportation

Affected Environment

Citywide Transportation System

The transportation system within the City of Sumner includes streets and highways, pedestrian and bicycle facilities, and transit and rail service. An inventory of the existing transportation system was conducted in fall 2014. This transportation system inventory and associated analyses provide a baseline for the existing transportation system and aided in identifying key transportation issues addressed in the update of the Plan. The inventory covers the arterial street system, traffic control, traffic volumes, traffic operations, historical accident records, transit and rail service, and pedestrian and bicycle facilities. The inventory was used in updating the City's travel demand model, which was used to update the future traffic volume forecasts for the 2015 Sumner Transportation Plan.

Freeways, Arterials, and Collectors

Exhibit 3-90 summarizes the existing roadway system's geometry and locations of the City's signalized intersections. The following sections provide a more detailed description of key roadways serving the City. Figure 5-1 in the Transportation Plan shows the functional classification of the City street system.

Freeways

Two major limited access, divided state highways serve Sumner: SR 167 and SR 410.

SR 167 is a four-lane freeway through Sumner. To the south and west, it connects to Puyallup and Tacoma. To the north, it connects to Auburn, Kent, and Renton. Within the Sumner UGA, SR 167 has a posted speed of 60 mph, and access is limited to grade-separated interchanges at 8th Street E, 24th Street E, SR 410, and SR 512. The freeway portion of SR 167 presently terminates at SR 512 west of Sumner's UGA. WSDOT has plans to extend the freeway west to intersect with I-5 to connect with the Port of Tacoma area.

The State has designated SR 167 as an HSS. HSS facilities provide and support transportation functions that promote and maintain significant statewide travel and economic linkages. The State plans for this HSS facility are developed from a statewide perspective. This planning includes policy development and accompanying funding support to represent a broad range of interests that depend on the facility. Because of its designation as an HSS facility, the State has the authority of setting the LOS standards for SR 167.

SR 410 is a four-lane freeway linking the cities of Bonney Lake and Buckley with SR 167. It has a posted speed of 55 mph and access is limited to grade-separated interchanges at Traffic Avenue, Valley Avenue/Orting Highway (SR 162), and Sumner-Tapps Highway (166th Street E). East of the UGA, SR 410 is a four-lane roadway with at-grade intersections. SR 410 is a State Highway of Regional Significance. Level of service standards for SR 410 have been established by the Puget Sound Regional Council (PSRC), in consultation with WSDOT.

Arterials

The major north-south arterials serving the City of Sumner include: East Valley Highway, West Valley Highway, Sumner-Tapps Highway, 142nd Avenue E, 136th Avenue E, Valley Avenue, and Traffic Avenue. The arterial classification map is provided on Exhibit 3-90. The following sections describe each of these roadways.

Valley Avenue is classified as a minor arterial providing access between SR 410, the residential neighborhoods east of the Sumner City downtown, and East Valley Highway north of the City. Land uses in the corridor are characterized by single and multi-family residences and some commercial uses. Valley Avenue has a posted speed of 25 mph. Traffic signals are provided at Main Street, Meade-McCumber Road, and the eastbound and westbound ramp terminus of SR 410. Since completion of the 2002 Sumner Transportation Plan, Valley Avenue has been improved to minor urban arterial standards and widened between Elm Street and SR 410 to provide 3 lanes, (one lane in each direction and center left-turn lane) with curb, gutter, sidewalks, and bike lanes.

South of SR 410, Valley Avenue is commonly referred to as the Orting Highway and is also known as SR 162. Within the City limits, this portion of Valley Avenue is classified as a principal arterial. The intersections of SR 162 at Rivergrove Drive, Pioneer Way E, 96th Street E intersections are signalized.

Traffic Avenue is a north-south arterial providing access between SR 410 and the Sumner City center and commuter rail station. It is five lanes between just north of Thompson and Main Streets. The adjacent land use primarily includes commercial developments. All minor intersections on the side street approaches are stop-controlled except State Street, which is signalized. Additional signalized intersections are provided at Main Street and the east and west ramp terminus of SR 410. The posted speed limit is 25 mph. Traffic Avenue south of the SR 410 intersection is four- to five-lanes. It connects to Shaw Road in the City of Puyallup; this connection did not exist in 2002. The Shaw Road extension to Traffic Avenue allows for a more direct connection to SR 410 for areas south, where previously SR 162 was the only connection.

North of Main Street, Traffic Avenue becomes Fryar Avenue, accessing Sumner's industrial areas. Fryar Avenue is a four-lane, undivided roadway between Main Street and just south of 57th Street E and then a three-lane roadway to 142nd Avenue E. It has two travel lanes between Puyallup Street and 142nd Avenue E. The two-lane section includes a bridge over the White (Stuck) River. All minor roadway approaches are stop controlled. Land uses adjacent to Fryar Avenue include the Sumner City Library and Senior Center, a United States Post Office, and other commercial developments.

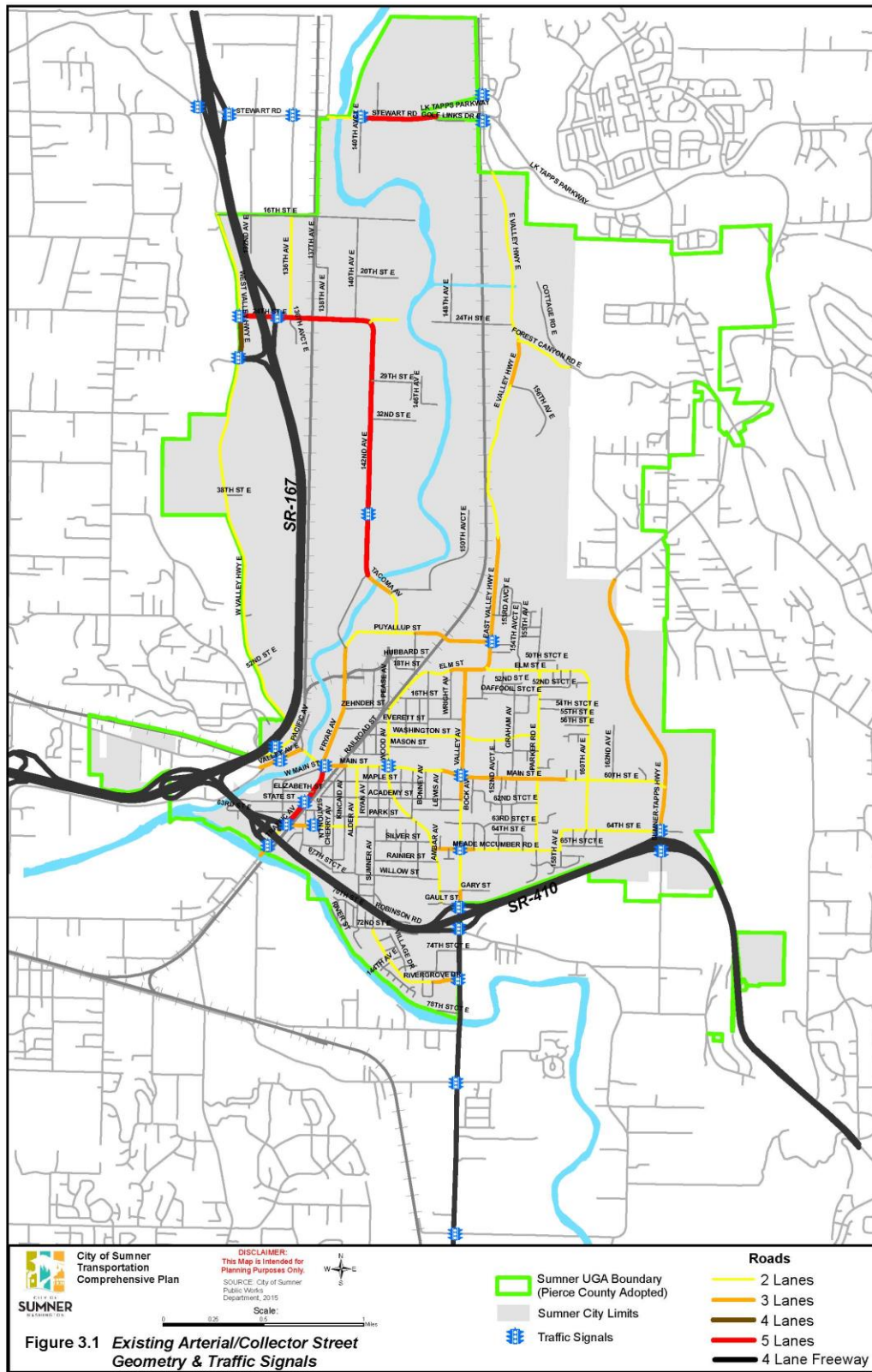
142nd Avenue E is a five-lane arterial, with two travel lanes in each direction and a center, two-way left turn lane. It provides access between Tacoma Avenue and 24th Street E. The roadway serves the industrial area north of the White (Stuck) River.

24th Street E is an arterial that crosses the Union Pacific Railroad (UPRR) tracks to provide access to 136th Avenue E and SR 167. Since completion of the 2002 Sumner Transportation Plan, the new SR 167/24th Street E interchange has been constructed and 24th Street E has been widened to five-lanes between the West Valley Highway and 142nd Avenue E.

136th Avenue E is a two-lane minor arterial providing access between 8th Street E and 24th Street E. This roadway is currently under construction to widen it to three-lanes with curb, gutter, and sidewalk. This minor arterial provides access and circulation for the freight distribution and light industrial areas in the northern part of the City west of the White (Stuck) River. The posted speed limit on this roadway is 30 mph.

East Valley Highway is a two- to three-lane minor arterial serving the northeast part of the city. It begins at Elm Street in Sumner and runs north out of the City limits into King County. The southern section between Elm Street and Salmon Creek includes turn lanes and sidewalks. This arterial links Sumner with industrial developments in the Algona, Pacific, and Auburn. The posted speed limit is 35 mph north of Salmon Creek. Since completion of the 2002 Sumner Transportation Plan, the East Valley Highway/8th Street E intersection has been reconfigured as a grade-separated interchange with SE 8th Street/Lake Tapps Parkway crossing over East Valley Highway. There are access ramps from Lake Tapps Parkway to East Valley Highway. The roadway traverses environmentally sensitive wetland areas near the White (Stuck) River. Developments along the roadway include the Puget Power Lake Tapps Power Plant and other scattered commercial and residential developments.

Exhibit 3-90. Existing Arterial and Collector Street Geometry and Traffic Signal Locations
(as of November 2014)



Source: City of Sumner, 2015

West Valley Highway is a two-lane roadway serving the west side of Sumner. It parallels SR 167. Similar to East Valley Highway, the SR 167 interchange connects the Sumner City center with the Algona and Pacific industrial areas north of the City. Small commercial and residential developments presently exist along some sections of West Valley Highway frontage. A number of light industrial business parks have been constructed since the 2002 Sumner Transportation Plan was adopted by the City. Steep slopes to the west limit the development potential along the west side of the roadway. The posted speed limit is 35 mph. Since completion of the 2002 Sumner Transportation Plan was prepared, 24th Street E has been extended to West Valley Highway as part of the new 24th Street E.

Sumner-Tapps Highway is an arterial providing access from the northwestern portion of the Lake Tapps bluff to SR 410. Within the Sumner UGA, it is a three-lane roadway; providing two lanes for traffic climbing the hill northbound and a single lane southbound. The Sumner City limits abut the roadway. Principal intersections include E Main Street (60th Street E) and 64th Street E. The intersection of 64th Street E is signalized and isolated in close proximity to the SR 410/166th Avenue E interchange eastbound ramps. East-to-north left turns are not allowed at the intersection at E Main Street and Sumner-Tapps Highway due to sight distance restrictions.

The major east-west arterials serving the City of Sumner include Main Street, Bridge Street, Pacific Avenue, Forest Canyon Road, 8th Street E, and Elm Street. Most of the east-west arterials serve the south part of the City.

Main Street is the primary east-west arterial through the City of Sumner. It begins west of the City center at Traffic Avenue and continues through downtown Sumner through the eastern residential areas to an intersection with Sumner-Tapps Highway. Land uses along this roadway vary from commercial uses in the city center to single family residences east of 160th Avenue E. Sumner High School is also located along Main Street. Primary intersections include Traffic/Fryar (signalized), Alder Avenue (all-way stop controlled), Wood Avenue (signalized), Valley Avenue (signalized), Parker Road (north-south approaches are stop controlled), 160th Avenue E (north-south approaches are stop controlled), and Sumner-Tapps Highway (west approach is stop controlled). A railroad crossing, with gates and signals, is located just east of Traffic Avenue.

Bridge Street is the extension of Main Street between Traffic and Pacific Avenues. It includes an old (1927), narrow, two-lane bridge over the White (Stuck) River.

Valley Avenue connects West Valley Highway to Bridge Street, which crosses over the White (Stuck) River. Valley Avenue is a two- to three-lane roadway with a posted speed of 25 mph. Valley Avenue provides one of the few connections for traffic between the Edgewood plateau west of the City with SR 410, SR 167, and destinations within Sumner. The short segment of Sumner Heights Drive, between West Valley Highway and Valley Avenue provides a crossing of the Burlington Northern Santa Fe (BNSF) railroad tracks. Gates and signals control the crossing.

8th Street E is an east-west arterial in the north part of Sumner. It has two-lanes west of the White River Bridge and five-lanes between the Bridge and Lake Tapps Parkway. It is called Steward Road E west of the White River Bridge and this section is within the City of Pacific. The section between SR 167 and the Bridge is currently under construction to be widened to five lanes. It links SR 167 and East Valley Highway. West of West Valley Highway, the roadway becomes Jovita Boulevard, traverses up the western bluff, and enters the City of Edgewood. The posted speed limits range is 35 mph.

Puyallup Street is currently a two-lane, minor arterial, which was extended since the 2002 Sumner Transportation Plan was adapted. This arterial connects between 142nd Avenue E to East Valley Highway. This route serves as a primary truck route between 142nd Avenue E and East Valley Highway.

Elm Street is classified as a minor arterial from Valley Avenue to East Valley Highway, providing the connection between these two north-south arterials. This arterial segment has three lanes. The posted speed limit is 25 mph. There is curb, gutter, and sidewalk on both sides of the roadway.

Forest Canyon Road is a two-lane, east-west minor arterial that provides access from East Valley Highway up the eastern valley bluff to the Lake Tapps residential areas. The posted speed limit is 25 mph within the City limits. The arterial has a 35-mph speed limit in the County.

Collectors

A number of collector arterials provide connections between the residential areas of Sumner to arterial roadways and to the regional freeway system. The collectors are also vital in connecting the residential areas to the central business district. In general, most of the collector roads in Sumner are two-lane roadways with turn lanes and signals provided at a limited number of cross streets.

Sumner Heights Drive is a two-lane, collector providing access between West Valley Highway and the residential areas in the City of Edgewood. The posted speed limit is 25 mph.

Zehnder Street is classified as a two-lane, east-west collector between Fryar and Wood Avenues where it then connects to Elm Street. Since completion of the 2002 Sumner Transportation Plan, the street has been reconstructed to collector street standards with curb, gutter, and sidewalks on both sides. It has a posted speed limit of 25 mph. The east end of Zehnder Street crosses two railroad tracks. Crossing gates and lights control the crossing.

Alder Avenue is a two-lane, north-south collector providing access between the City center and residential areas to the south. Adjacent land uses are primarily single-family residences and commercial developments, including the Sumner City Hall/Police Station in the downtown area. The posted speed limit is 25 mph.

Thompson Street is an east-west collector providing access to the City's central residential areas. It connects Traffic Avenue to Alder Avenue. It begins at the Traffic Avenue/westbound SR 410 ramp intersection, where signs identify the preferred route to the City center. Between Station Lane and Traffic Avenue, the street is 40-feet wide and striped for three lanes. The remaining section is a two-lane collector. The posted speed limit is 25 mph.

Wood Avenue is a two-lane, north-south collector roadway linking Valley Avenue and Elm Street just east of the Sumner City center. It primarily provides access to the residential areas north and south of Main Street. The Main Street intersection is signalized. The posted speed limit is 25 mph.

Elm Street is classified as a two-lane collector arterial between Wood and Valley Avenues and between East Valley Highway and 160th Avenue E. The short section between Valley Avenue and East Valley Highway is part of the Valley Avenue/East Valley Highway minor arterial. The posted speed limit is 25 mph.

158th Avenue E is a short two-lane, north-south collector connecting Meade-McCumber Road and 64th Street E. The posted speed limit is 25 mph.

Meade-McCumber Road is a two-lane collector roadway connecting Wood Avenue to 158th Avenue E which connects to 64th Street E and the Sumner-Tapps Highway. Land use along this roadway is primarily single- and multi-family housing. The posted speed limit is 25 mph.

Parker Road is classified as a two-lane roadway connecting Meade-McCumber Road and Elm Street. The posted speed limit is 25 mph. Sections of the roadway have been improved to City Standards by adjacent development while other sections lack sidewalks, curbs, and gutters.

Washington Street is a two-lane roadway connecting Wood Avenue to Valley Avenue and Parker Road. It serves access to residential areas; the north side of Sumner High School and athletic fields; and vacant, developable land east of Parker Road. The posted speed limit is 25 mph.

160th Avenue E is a two-lane, north-south roadway that serves as a collector between Elm Street and 64th Street E. The posted speed limit is 25 mph.

64th Street E between Sumner-Tapps Highway and 158th Avenue E is a two-lane collector roadway. It is an extension of the Meade-McCumber Road Collection which connects to Valley Avenue. The posted speed limit is 25 mph. Its intersection with Sumner-Tapps Highway is signalized.

Rivergrove Drive is a wide, two-lane collector connecting the residential areas southeast of the SR 410 /SR 162 interchange. It connects the local residential streets to SR 162. The posted speed limit is 25 mph.

Riverside Drive is a two-lane, east-west Pierce County collector arterial connecting SR 162 to 96th Street east of SR 162. It also connects to the 166th Avenue E corridor commercial area via 75th Street E. Land

uses along this roadway are mainly agricultural and residential. Riverside Drive has been redirected to connect with 74th Street E east of its connection with SR 162. The posted speed limit is 35 mph.

Local Streets

The remaining roadways within the City limits and UGA are classified as “local streets” and primarily provide for property access into Sumner. They generally have two travel lanes, have 25 mph speed limits, and provide access between residential or business areas and the arterials.

East Sumner Transportation System

Key facilities in the East Sumner Subarea include:

Sumner-Tapps Highway, described above, is a minor arterial on the east side of the East Sumner subarea. It provides access from the northwestern portion of the Lake Tapps bluff to SR 410. It is a three-lane facility in Sumner; providing two lanes for traffic climbing the hill northbound and a single lane southbound. Principal intersections in East Sumner include E Main Street (60th Street E) and 64th Street E. The intersection of 64th Street E is signalized and is located approximately 200-feet north of the SR 410/166th Avenue E eastbound ramp intersection. East-to-north left turns are not allowed at the E Main Street and Sumner-Tapps Highway intersection.

Main Street is the primary east-west arterial through the City of Sumner. It connects the East Sumner Subarea residential areas to Downtown Sumner as well as Sumner-Tapps Highway. Within East Sumner, the primary intersections are 160th Avenue E (north-south approaches are stop controlled) and Sumner-Tapps Highway (west approach is stop controlled).

160th Avenue E is a two-lane, north-south roadway that serves as a collector between Elm Street and 64th Street E. The posted speed limit is 25 mph. Intersections along this corridor are unsignalized including the connections at E Main Street and 64th Street E within the East Sumner Subarea.

64th Street E between Sumner-Tapps Highway and 158th Avenue E is a two-lane collector roadway. This facility runs east-west and connects to Valley Avenue via Meade-McCumber Road. As described above, the intersection of 64th Street E and Sumner-Tapps Highway is closely spaced with the SR 410 eastbound ramp intersection. The posted speed limit is 25 mph.

Parker Road is west of the East Sumner Subarea. It is classified as a two-lane roadway connecting Meade-McCumber Road and Elm Street. The posted speed limit is 25 mph. Sections of the roadway have been improved to City Standards by adjacent development while other sections lack sidewalks, curbs, and gutters.

Citywide Traffic Volumes

Daily and PM peak hour traffic volumes were collected from a variety of sources including the City of Sumner, WSDOT, and recent traffic impact analyses for proposed developments in the area. These traffic volumes were supplemented with existing PM peak hour turning movement counts conducted for the plan update in October 2014.

Freeways

Exhibit 3-91 shows the average daily traffic (ADT) volumes on the State highways for 2001 (or 1999 at locations where 2001 counts were not available in the 2002 Sumner Transportation Plan) and 2013.

The two State highways, SR 167 and SR 410, carry the highest traffic volumes in the study area. The ADT on SR 167 west of the SR 410 interchange was about 101,000 in 2013. North of the SR 410 interchange and south of the 24th Street E interchange, the 2013 ADT was about 90,000. North of the 8th Street E interchange, the SR 167 2013 ADT was about 96,000. The ADT on SR 167, south of the 24th Street E interchange, increased by 17 percent between 2001 and 2013. The ADT on SR 167, north of the 8th Street E interchange, increased by 20 percent between 2001 and 2013.

The 2013 ADT on SR 410 west of Traffic Avenue was 68,000. East of the SR 162 interchange, the ADT drops to 48,000 vehicles per day (vpd). East of 166th Avenue E, the ADT along SR 410 is also 48,000 vpd. The ADT on SR 410 increased by 5 to 6 percent between 2001 and 2013 both west of Traffic Avenue and

east of SR 162. East of 166th Avenue E, the ADT increased by approximately 12 percent between 2001 and 2013.

The ADT on SR 162 south of SR 410 has remained consistent during the past 12 years with approximately 21,000 vpd according to WSDOT records.

Arterials and Collectors

Exhibit 3-92 and Exhibit 3-93 show the 2013/2014 two-way PM peak hour traffic volumes on Sumner's arterials and collectors. The 2001 traffic volumes from the 2002 Sumner Transportation Plan are also provided for comparison. The counts show that there has been general growth in Sumner PM peak hour traffic over the last 13 years. In addition, roadway improvements and extensions completed since the 2002 Sumner Transportation Plan have changed travel patterns, which result in larger increases along some arterials and decreases along others.

PM peak hour volumes on SR 162 south of SR 410 have decreased by about 19 percent during the past 13 years although the daily volumes have remained relatively constant. Some of the decrease in traffic at this location may be a result of traffic shifting to Shaw Road, which was extended since the 2002 Sumner Transportation Plan was adopted. The traffic shift to Shaw Road is seen in the significant increase in PM peak hour traffic volumes along Traffic Avenue south of SR 410. The PM peak hour traffic on the Traffic Avenue south of SR 410 has increased by about 50 percent since 2001. This represents a 3.2-percent annual growth rate.

Puyallup Street was extended to connect at East Valley Highway since completion of the 2002 Sumner Transportation Plan was prepared. This extension has resulted in increased weekday PM peak hour traffic along East Valley Highway by 30 percent to the north and 50 percent to the south of Puyallup Street. In addition, PM peak hour traffic along Valley Avenue between Elm Street and the SR 410 ramps has increased by 50 to 65 percent during the past 13 years due to the extension of Puyallup Street. These increases in traffic are likely related to growth in the City as well as commuters using East Valley Highway and Valley Avenue to avoid congestion along SR 167.

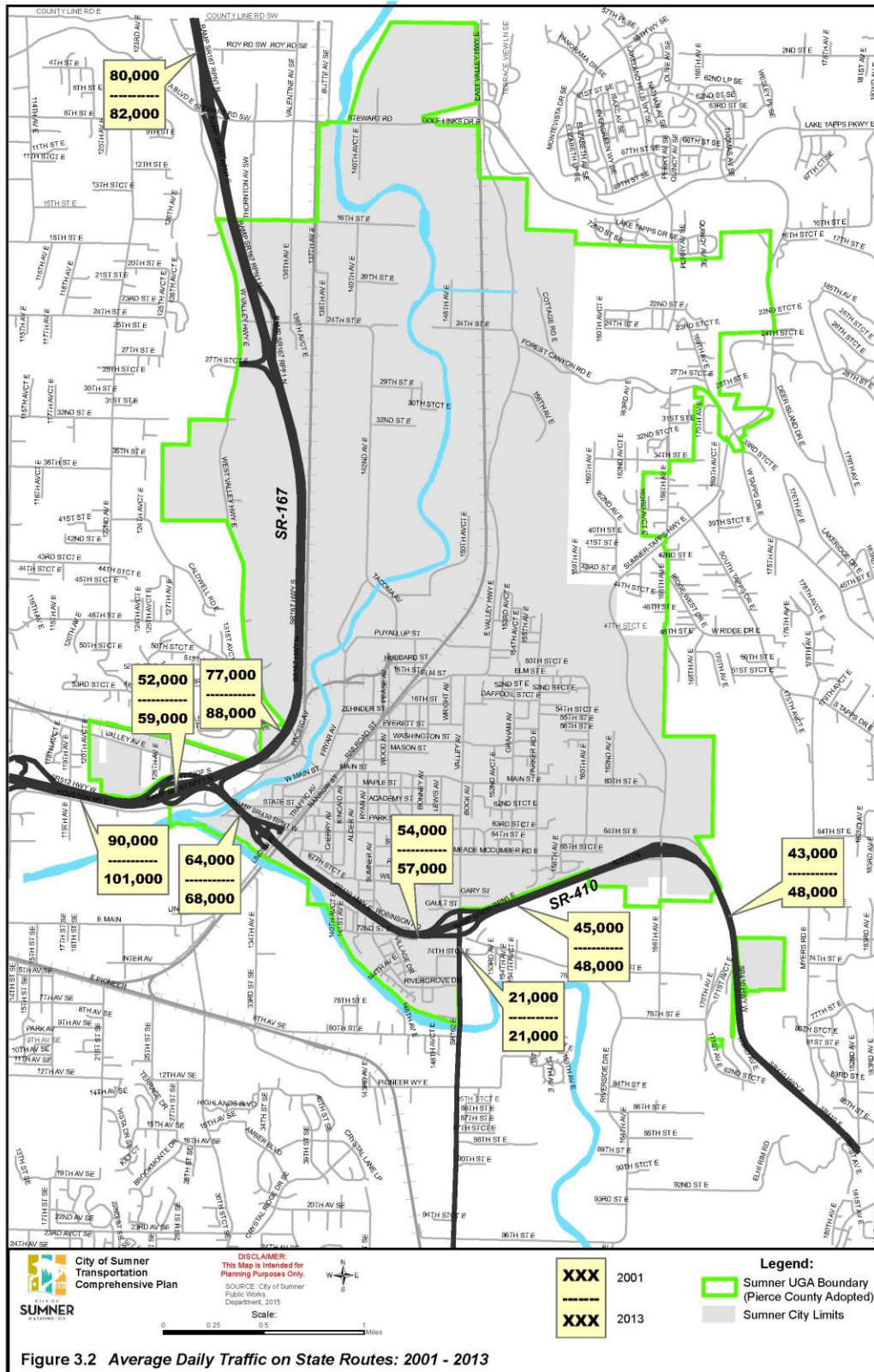
In the north part of the City, PM peak hour traffic volumes have also increased by approximately 20 to 40 percent during the 2001-2014 time frame along many of the key corridors. For example, traffic volumes along 142nd Avenue E grew by 49 percent due in part to growth in industrial land uses in the area, as well as construction of the SR 167/24th Street E interchange. Along 8th Street E west of East Valley Highway, PM peak hour traffic grew by 47 percent due to the opening of the Lake Tapps Parkway, which was closed in 2001.

There are also portions of the north part of the City with much smaller traffic growth over the past 13 years. These include East Valley Highway south of 8th Street E where PM peak hour volumes have increased by 5 percent and 8th Street E west of Valentine Avenue SE where volumes have increased by 8 percent. The growth patterns indicate that travel in the northeast corner of the City at 8th Street E and East Valley Highway is generally utilizing Lake Tapps Parkway and not accessing East Valley Highway as an alternative commute route.

The PM peak hour traffic volumes in the established residential areas in Sumner west of Valley Avenue and south of Main Street has not increased substantially during the past 13 years. The PM peak traffic on Alder Avenue between Main and Willow Streets has remained relatively constant during the past 13 years, indicating that increases in traffic on major routes in the southern part of the City is not generated by the residential/Downtown area.

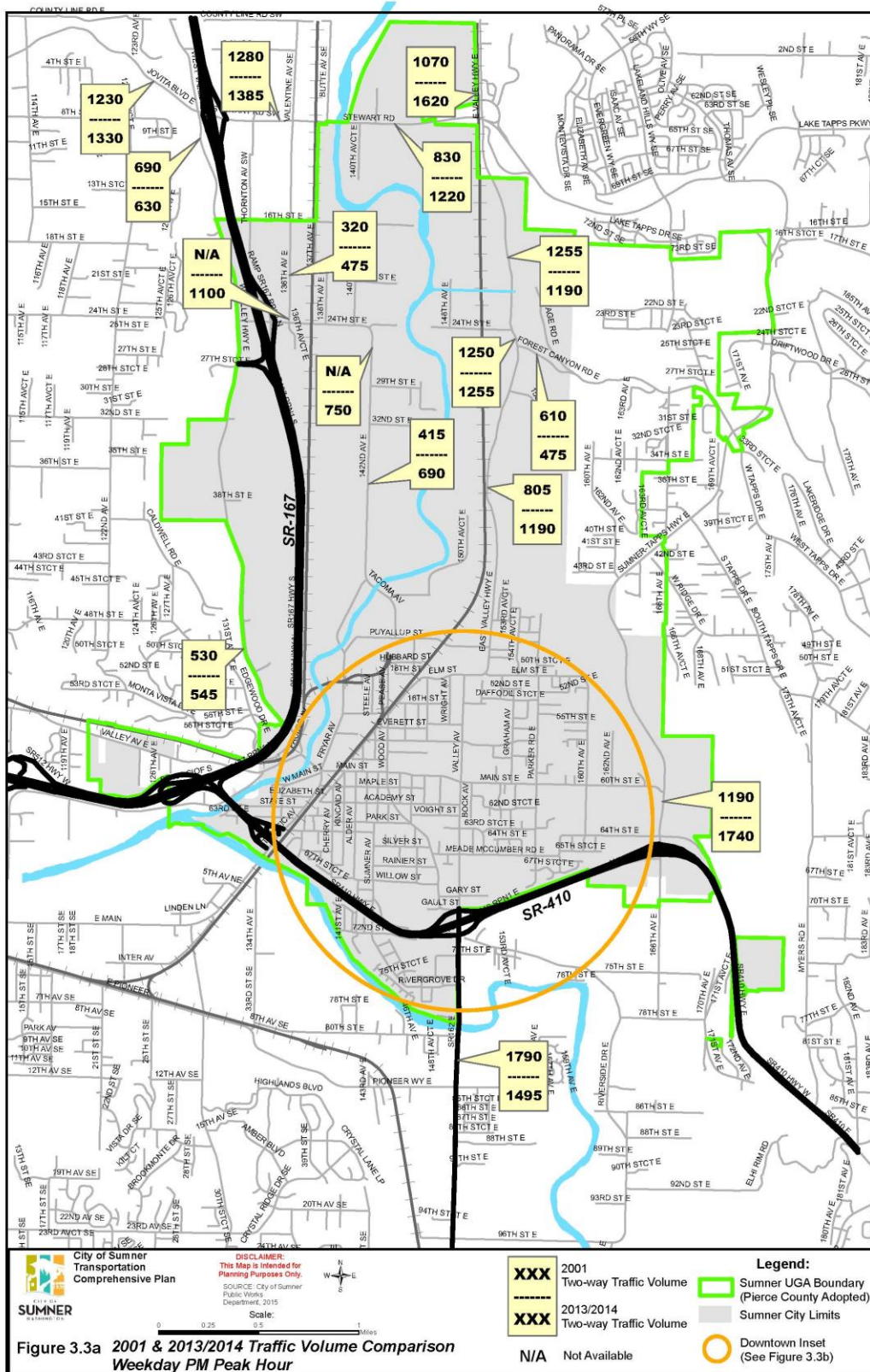
The PM peak hour traffic volumes on collectors and arterials serving the residential areas east of Valley Avenue have decreased during the past 13 years. PM peak hour traffic volumes on Main Street east of Valley Avenue have stayed constant. PM peak hour traffic on Main Street east of Parker Road has decreased by 10 percent or 100 vph. PM peak hour traffic on Meade-McCumber Road has increased by 20 percent or 40 vph during the past 13 years. There has been some development in this area, but in general limited changes have occurred in this area since last Transportation Plan resulting in only small changes in PM peak hour traffic.

Exhibit 3-91. 2001 & 2013 Average Daily Traffic on State Routes Comparison



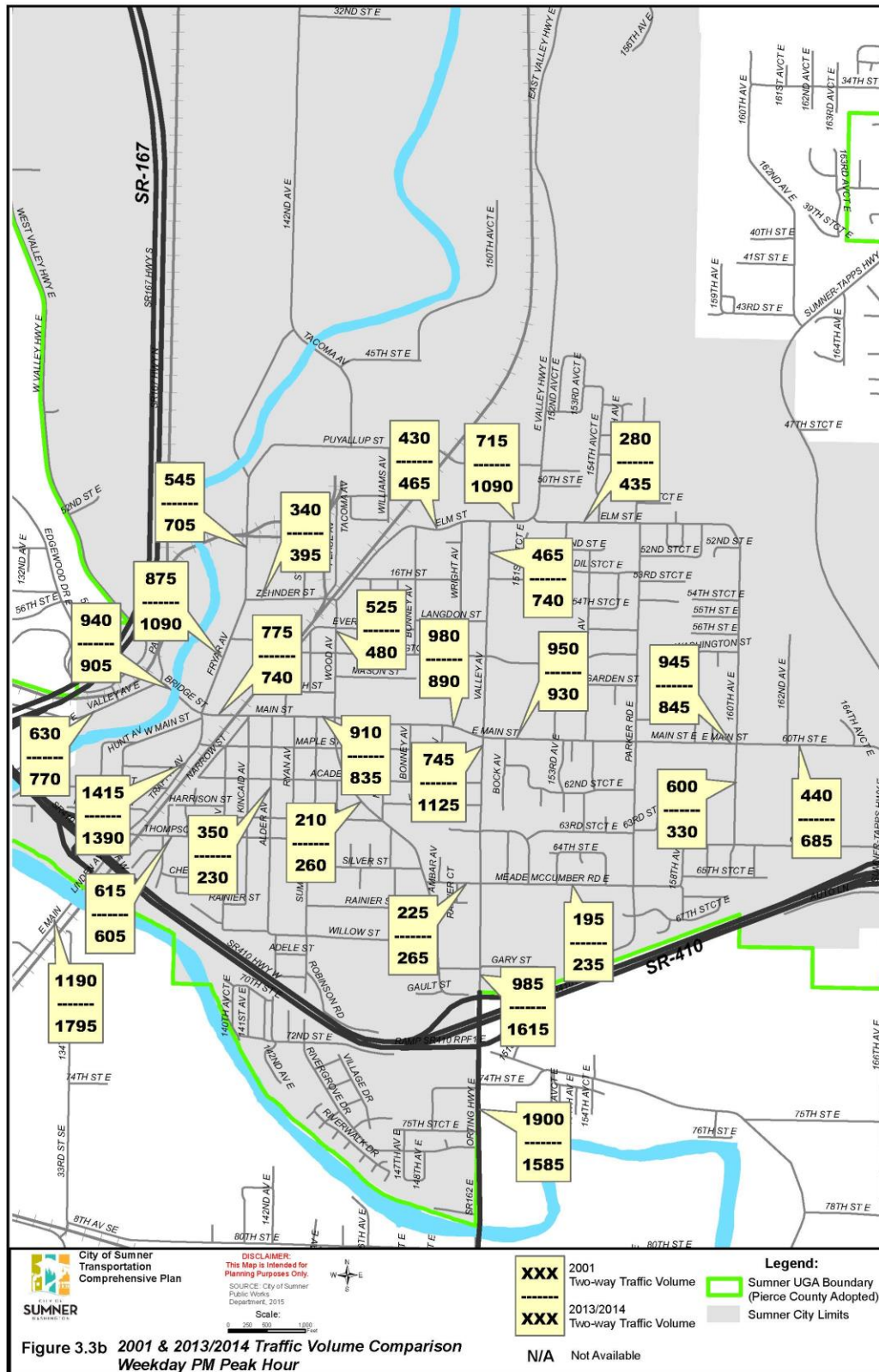
Source: City of Sumner, 2015

Exhibit 3-92. 2001 & 2014 Traffic Volume Comparison – Weekday PM Peak Hour



Source: City of Sumner, 2015

Exhibit 3-93. 2001 & 2014 Traffic Volume Comparison – Weekday PM Peak Hour (Downtown Inset)



East Sumner Neighborhood Plan Traffic Volumes

During the 13-year period, traffic volumes along Sumner-Tapps Highway north of 64th Street E grew from 1,190 to 1,740 vph. This is almost a 50-percent increase. This increase is likely due the opening of Lake Tapps Parkway since completion of the 2002 Sumner Transportation Plan and development to the north in the vicinity of Sumner-Tapps Highway. In addition, along 64th Street E west of Sumner-Tapps Highway PM peak hour traffic volumes have decreased by 68 percent while PM peak hour traffic volumes along E Main Street west of Sumner-Tapps Highway have increased by 56 percent. This increase in PM peak hour traffic is likely due to traffic shifting from 64th Street E to E Main Street when traveling to and from Sumner-Tapps Parkway due to the congestion at the Sumner-Tapps Highway/64th Street E intersection and SR 410 interchange. This congestion makes it difficult to turn to and from 64th Street E.

Citywide Truck Traffic

The availability of industrial land and its proximity to the SR 167, SR 410, I-5 freeway corridors has made Sumner an attractive place for trucking-related developments such as warehousing and distribution centers.

The City has adopted a formal truck route plan in an effort to manage truck traffic within its City limits. Existing truck traffic is routed around the perimeter of the residential and commercial sections of Sumner. With the extension of Puyallup Street, trucks routes have been altered since the 2002 Sumner Transportation Plan was prepared; this change removed the truck route designation from Valley Avenue, Elm Street, and Zehnder Street. Truck traffic is currently routed along the 24th Street E, 142nd Avenue, Puyallup Street, Traffic Avenue, Fryar Avenue, and East Valley Highway corridors to connect the industrial areas to the freeway system and principal arterials. This change in routing reduces the impact of truck traffic on facilities within the City center. Truck traffic entering and exiting Sumner from the industrial areas to the north is served by the two SR 167 interchanges at 8th Street E and 24th Street E. The SR 167/24th Street E interchange and extension of 24th Street E to W Valley Highway was constructed since the 2002 Sumner Transportation Plan was developed; this has improved traffic circulation within the industrial area of the City.

Average daily truck percentages along Valley Avenue, Elm Street, and Zehnder Street are similar to 1999 when these facilities were truck routes. Heavy vehicle traffic along Elm Street and Zehnder Street increased slightly over the past 15 years with Elm Street carrying 8 percent heavy vehicle traffics west of Parker Road and Zehnder Street carrying approximately 10 percent. Along Valley Avenue heavy vehicles represent approximately 7 percent of the average daily traffic.

The average daily truck percentages along Traffic Avenue, as counted in 2014, are 12 percent northbound and 11 percent southbound of the total daily volumes, 2 to 3 percent less than in 1999. Along Fryar Avenue, heavy vehicle volumes account for 15 percent of total daily traffic. Heavy vehicle traffic accounts for 11 percent of the ADT northbound on East Valley Highway and for 10 percent southbound south of Salmon Creek. In the northern portions of the City, where the majority of the development is industrial, average daily truck percentages are much higher compared to the southern/City Center area. Along West Valley Highway, north of 24th Street E, heavy vehicles account for 32 percent of the total daily traffic. Average daily truck percentages along 24th Street E are 40 percent eastbound and 36 percent westbound. Heavy vehicle traffic accounts for 36 percent of the northbound ADT along 142nd Avenue E and 32 percent southbound. All of these arterials are currently designated as truck routes.

East Sumner Neighborhood Plan – Truck Traffic

The City does not have any arterials designated as truck routes in East Sumner and overall heavy vehicles represent only a small portion of the daily traffic. The only facility designed as a truck route in this area is SR 410. Along 64th Street E, heavy vehicle traffic accounts for 7 percent of the total daily volumes. Heavy vehicle traffic accounts for 5 percent of the ADT southbound along 160th Avenue E and 3 percent northbound.

Citywide Traffic Operations

Traffic volumes, available capacity, and field reviews were used to provide an overview of traffic operations in and around Sumner as part of the development of the 2015 Transportation Plan. Level of

service (LOS) is used as a tool to qualitatively measure the operational conditions of a transportation system. The operations of an intersection and its individual turning movements can be described alphabetically by a range of levels of service designations from LOS A, indicating free-flowing traffic, to LOS F, indicating extreme congestion and long vehicle delays. At signalized intersections, LOS is measured in terms of average control delay per vehicle and is reported for the intersection as a whole. Control delay is a complex measure based on many variables, including signal phasing and coordination (i.e., progression of movements through the intersection and along the corridor), signal cycle length, and traffic volumes with respect to intersection capacity and resulting queues. At unsignalized intersections, LOS is expressed in terms of the weighted average control delay of the overall intersection for all-way stop controlled intersections or by minor street movement for side-street stop controlled intersections. Appendix C of the Transportation Plan includes an in-depth discussion of LOS.

The City of Sumner previously adopted an LOS D standard for peak-hour traffic flow on roadways within its UGA except at the Traffic Avenue/Main Street/Fryar Avenue and Main Street/Alder Avenue intersections where an LOS F standard is adopted. Potential changes and implementation of the standard are discussed in the Goals and Policies Section of the Draft Transportation Plan under separate cover.

WSDOT has adopted a LOS D standard for State highways in urban areas. Since SR 167 is a designated HSS, the State requires local jurisdictions to adopt this LOS standard for HSS facilities in their Comprehensive Plans. For non-HSS facilities, the State requires that an agency coordinate with WSDOT in establishing a LOS standard for those facilities. SR 410 and SR 162 are not HSS-designated facilities. Puget Sound Regional Council (PSRC) has adopted LOS standards for regionally significant state highways or state transportation facilities that are non-HSS such as SR 410 and SR 162. Based on the PSRC tiered LOS system, both SR 410 and SR 162 have an adopted LOS D standards.

Exhibit 3-94 highlights existing traffic operation deficiencies along the key corridors serving regional and local traffic in the vicinity of Sumner. Exhibit 3-95 illustrates the existing PM peak hour LOS at a number of intersections within and immediately outside the City of Sumner, including 26 signalized intersections and 20 unsignalized intersections. The turning movement counts were collected at key intersections during 2013 and 2014. Existing traffic operations were analyzed based on the procedures documented in the 2010 Highway Capacity Manual (HCM) (Transportation Research Board) using the Synchro software program (version 8).

Exhibit 3-95 and Exhibit 3-96 summarizes the LOS and delay at the study area intersections. Six of the study intersections currently operate at LOS E or F during the weekday PM peak hour. All of the intersections operating at LOS E or F are unsignalized. As described previously, there have been roadway improvements and extensions that have changed travel patterns in the City such as the extension of Puyallup Street and new interchange at SR 167 and 24th Street E. These improvements have resulted in increases in traffic volumes at the unsignalized 136th Avenue E/24th Street E and Valley Avenue/Elm Street intersections resulting in LOS F and E operations, respectively during the weekday PM peak hour. In addition, there are some intersections where traffic operations have improved as a result of the transportation improvements and/or a decrease in traffic volumes such as the Valley Avenue/74th Street E intersection, which operates at LOS C during the weekday PM peak hour as compared to LOS E previously without the Shaw Road extension.

The most significant traffic operations deficiencies in the Sumner area are on regional routes or at connections to the regional freeway or arterial system. SR 167, the major north-south freeway in the valley between Puyallup and Renton, is severely congested during peak commuter periods. The southbound off-ramp at the 8th Street E interchange with SR 167 also has significant delays due to high volumes and stop sign traffic control.

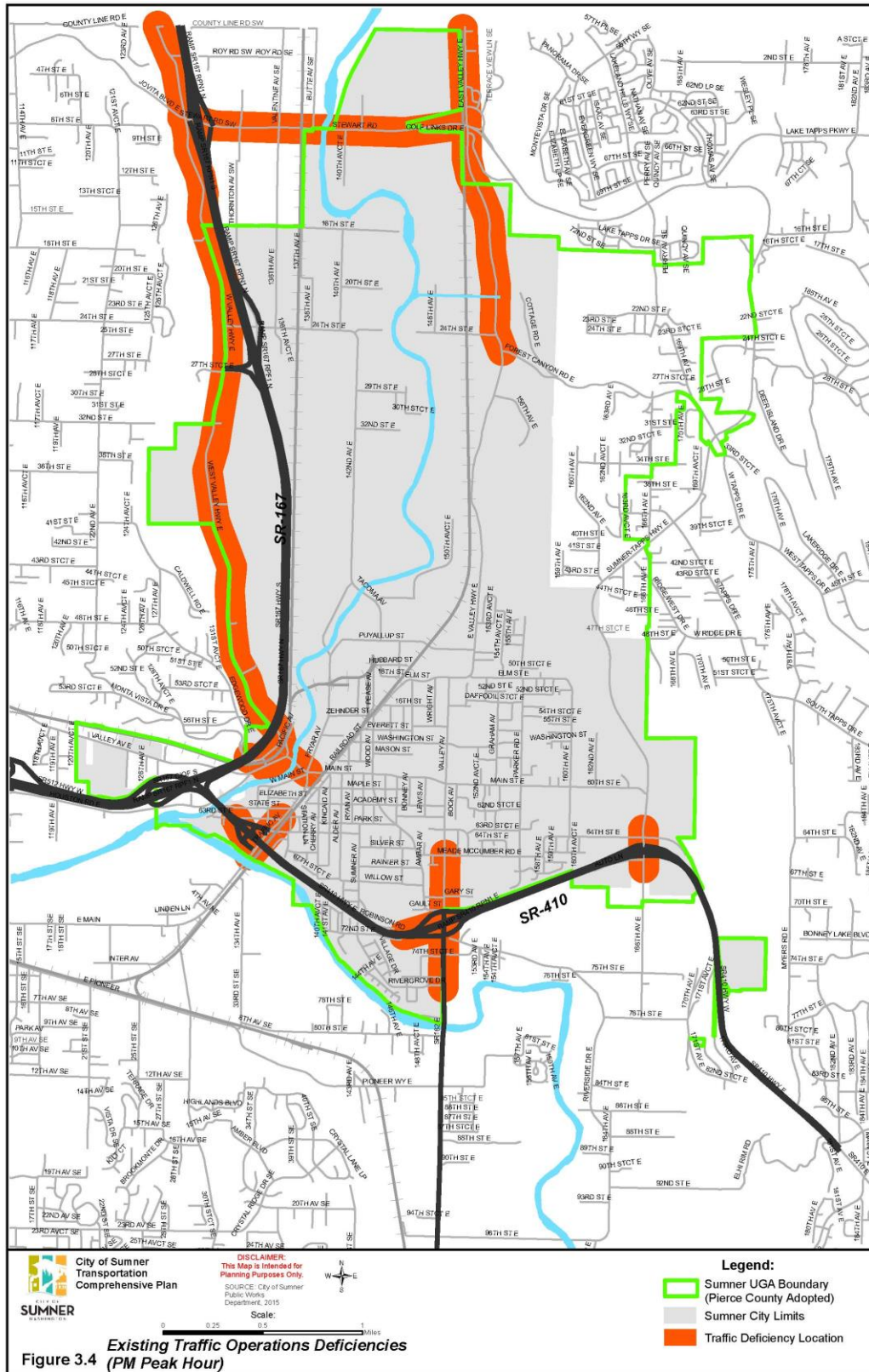
The calculated intersection delays at the signalized ramp intersections of SR 410/Traffic Avenue, SR 410/Valley Avenue (SR 162) and SR 410/Sumner-Tapps Parkway show LOS D or better conditions. However, during peak traffic periods, the three Sumner interchanges with SR 410 also have relatively high delays and impacts associated with traffic queues extending between intersections. These result from closely spaced intersections, inadequate storage for turn movements, and poor signal operations. At times, delays at these intersections can be significantly longer and traffic queues can block adjacent intersections. This can result in lower levels of service than calculated using the HCM, and shown in Exhibit 3-95 and Exhibit 3-96.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION**

Travel along 8th Street E has improved within the City since 2001 with widening of this facility; however, the White River Bridge and west of the Sumner UGA continue to be impacted by heavy volumes and rolling traffic queues. Improvements are currently being completed by the City of Pacific on the western portion of the corridor to widen it to 5-lanes. This current project does not include widening of White River Bridge, which is currently being designed as a four-lane crossing and is partially funded. The Bridge would continue to be a bottleneck along 8th Street E until it is widened. Operations along East Valley Highway in the north part of the City have also been improved with the opening of Lake Tapps Parkway and the grade separation of 8th Street E and East Valley Highway.

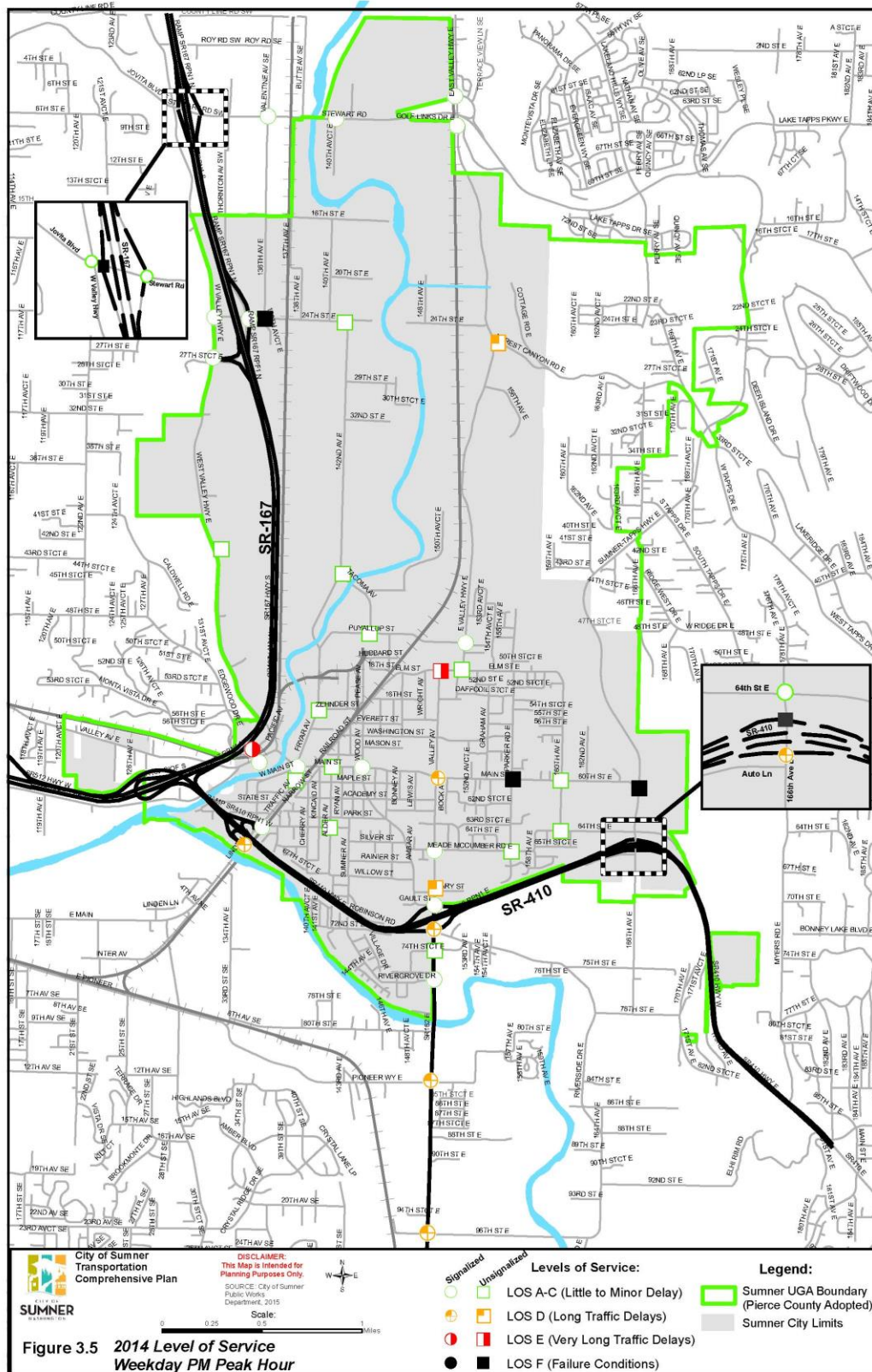
The Sumner Heights Drive and Bridge Street/Valley Avenue connections between West Valley Highway and Traffic Avenue also have congestion. Delays result from the short distance on the connector between West Valley Highway/Sumner Heights and Valley Avenue. The railroad crossing at this location further adds to potential delays.

Exhibit 3-94. Existing Traffic Operations Deficiencies – PM Peak Hour



Source: City of Sumner, 2015

Exhibit 3-95. 2014 Existing Weekday PM Peak Hour Level of Service



Source: City of Sumner, 2015

Exhibit 3-96. Level of Service Summary for Existing (2014) Conditions – PM Peak Hour

Intersections	Traffic Control	2014 Existing		
		LOS ¹	Delay ²	WM ³
1. W Valley Highway E/Jovita Blvd/Stewart Rd SE (8th St E)	Signal	B	19	-
2. SR 167 SB Ramps/Stewart Rd SE (8th St E)	Side-Street Stop	F	> 50	SB
3. SR 167 NB Ramps/Stewart Rd SE (8th St E)	Signal	B	12	-
4. Valentine Ave SE/Stewart Rd SE (8th St E)	Signal	C	24	-
5. 140th Court E/Stewart Rd SE (8th St E)	Signal	A	6	-
6. East Valley Highway/Terrace View Dr SE	Signal	B	12	-
7. East Valley Highway/East Valley Access Rd	Signal	A	10	-
8. East Valley Highway/Forest Canyon Rd	Side-Street Stop	D	29	WB
9. 142nd Ave E/24th St E	Side-Street Stop	B	11	SB
10. 136th Ave E/24th St E	Side-Street Stop	F	>50	SBL
11. SR 167 NB Ramps/24th St E	Signal	A	7	-
12. West Valley Highway/24th St E	Signal	B	11	-
13. West Valley Highway/SR 167 SB Ramps	Signal	B	17	-
14. West Valley Highway E/42nd St E	Side-Street Stop	B	12	-
15. West Valley Highway/Sumner-Heights Dr E ⁴	Signal	E	73	-
16. Valley Ave E/Sumner-Heights Dr E ⁴	Signal	C	32	-
17. Traffic Ave/Main St (Bridge St)	Signal	C	27	-
18. Traffic Ave/Maple St	Side-Street Stop	B	10	WB
19. Traffic Ave/SR 410 WB Ramps (Thompson St) ⁵	Signal	B	14	-
20. Traffic Ave/SR 410 EB Ramps ⁵	Signal	D	42	-
21. Thompson St/Alder Ave	Side-Street Stop	B	13	NB
22. Alder Ave/Main St	All-Way Stop	B	12	-
23. Wood Ave/Main St	Signal	B	13	-
24. Valley Ave/Main St	Signal	D	38	-
25. Valley Ave/Meade McCumber Rd E	Signal	C	22	-
26. Valley Ave/Gary St	Side-Street Stop	D	32	WB
27. SR-162/SR 410 WB Ramp ⁵	Signal	C	34	-
28. SR-162/SR 410 EB Ramp ⁵	Signal	D	46	-
29. SR 162/74th St E	Side-Street Stop	C	19	WB
30. SR 162/Rivergrove Dr	Signal	C	26	-
31. SR 162/Pioneer Way E	Signal	D	39	-
32. SR 162/96th St E	Signal	B	20	-
33. Fryar Ave/Zehnder Ave	Side-Street Stop	C	21	WB
34. Tacoma Ave/Puyallup St	All-Way Stop	B	15	-
35. Tacoma Ave/142nd Ave E	Side-Street Stop	B	13	EBL
36. East Valley Highway/Puyallup St	Signal	B	17	-
37. East Valley Highway/Elm St	Side-Street Stop	E	36	WBL

Intersections	Traffic Control	2014 Existing		
		LOS ¹	Delay ²	WM ³
38. Valley Avenue/Elm St	Side-Street Stop	E	36	NBL
39. Parker Rd/Main St	Side-Street Stop	F	>50	SB
40. 160th Ave E (Van Tassel Rd)/Main St (60th St E)	Side-Street Stop	C	22	SB
41. Sumner-Tapps Highway (166th Ave E)/E Main St	Side-Street Stop	F	>50	EB
42. Sumner-Tapps Highway (166th Ave E)/64th St E	Signal	A	9	-
43. Sumner-Tapps Highway (166th Ave E)/SR 410 WB Ramps ⁵	Side-Street Stop	F	>50	WB
44. Sumner-Tapps Highway (166th Ave E)/SR 410 EB Ramps ⁵	Signal	D	42	-
45. 160th Ave E/64th St	All-Way Stop	B	10	-
46. Parker Rd E/Meade McCumber Rd E	Side-Street Stop	B	10	NB

Level of service (LOS), based on 2010 Highway Capacity Manual (HCM) methodology.

1. Average delay in seconds per vehicle.
2. Worst movement reported for minor street, stop-controlled unsignalized intersections. SBT/L = southbound through left-turn movement; SBL = southbound left-turn movement; SB = southbound approach; WB = westbound approach; EB = eastbound approach; EBL = eastbound left-turn movement; NB = northbound approach
3. The 2010 HCM methodology does not support analysis of signals operated under one controller; therefore, the HCM 2000 method was used to evaluate this intersection.
4. Delays at this intersections may be than longer than report. Traffic queues are observed to block adjacent intersections.

Source: City of Sumner, 2015

As shown in the table and discussed previously, all the intersection operating at LOS E or F are unsignalized except the West Valley Highway/Sumner-Heights Drive E intersection. The Manual on Uniform Traffic Control (MUTCD) four- and eight-hour traffic signal volume warrants were reviewed to see if any of the unsignalized intersections operate at LOS E or F would be candidates for signal control. The results show that four out of the six intersections would meet one or more of the volume warrant criteria for installation of a signal under existing conditions. The locations meeting the signal warrant criteria include SR 167 SB Ramps/Stewart Road SE, 136th Avenue E/24th Street E, Sumner-Tapps Highway/ E Main Street, and Sumner-Tapps Highway/SR 410 WB Ramp. The Sumner-Tapps Highway intersections with E Main Street and SR 410 have been reviewed as part of the planning for the East Sumner Neighborhood Plan and roundabout or traffic signal control has been recommended. The signalized West Valley Highway/Sumner-Heights Drive E intersection operates at LOS E due to the high volume of left-turns from West Valley Highway to Sumner-Heights Drive E coupled with the limited capacity with only one westbound left-turn lane.

East Sumner Neighborhood Plan Traffic Operations

Study intersections numbers 40-46 are within the East Sumner Neighborhood Plan. Two of the study intersections operate at LOS F and the other 4 operate at LOS D or better. Both E Main Street and SR 410 Westbound Ramp with Sumner-Tapps Highway are unsignalized and operate at LOS F due to high north-south PM peak hour volumes making it difficult for side-street traffic to enter the traffic stream. The calculated intersection delays at the Sumner-Tapps Highway intersections of SR 410 ramps and 64th Street E show LOS D or better conditions. At times, delays at these intersections can be significantly longer and traffic queues can block adjacent intersections. This can result in lower levels of service than calculated using the HCM, and shown on Exhibit 3-95 and in Exhibit 3-96. A review of the MUTCD four- and eight-hour traffic signal volume warrants show that both Sumner-Tapps Highway/ E Main Street and Sumner-Tapps Highway/SR 410 WB Ramp intersections would meet the criteria for a signal. These intersections have been reviewed as part of the planning for the East Sumner Neighborhood Plan and roundabout or traffic signal control has been recommended.

Traffic Safety

Collision records for the most recent complete three-year period were reviewed for all collisions reported in City of Sumner. Historical safety data was collected from WSDOT for the period of January 1, 2011 to December 31, 2013. A review of historical collisions was completed to identify potential safety issues for vehicles, pedestrians, and cyclists. There were four fatalities over the past three-years within Sumner not at intersections. Three of the fatalities were due to driving under the influence of alcohol and occurred on Sumner-Tapps Highway, Valley Avenue E, and SR 167. The fourth fatality was pedestrian-vehicle related where a pedestrian crossed E Valley Highway at night and was not in a marked crossing or at an intersection. In addition to this fatality, there were 7 other pedestrian-bicycle related collisions reported within the 3 year period evaluated. The location of the collisions included the Traffic Avenue/Maple Street, Traffic Avenue/SR 410 Eastbound Ramps, Valley Avenue/SR 410 Eastbound Ramps, Valley Avenue/Elm Street, and Parker Road/Main Street intersections as well as along East Valley Highway at Forest Canyon Road E and Main Street at Wood Avenue.

Further review in the study area was completed by compiling crash rates by study intersection to identify potentially problematic locations. An analysis of crash rates for the study intersections was completed to identify the average crash frequency based on the number of vehicles traveling through the study intersections. The typical measure for determining crash rates at intersections is the number of crashes per million entering vehicles (MEV).

Critical Crash Rate

The observed crash rate at intersections was compared to a critical crash rate calculated for each intersection to compare among study intersections that have similar characteristics. For the study intersections in the City, the intersections were grouped into three categories: traffic signals; side-street stop-control; and all-way stop-control intersections. This is consistent with guidance provided in Chapter 4 of the Highway Safety Manual (AASHTO, 2010). Exhibit 3-97 summarizes the factors and calculations to determine the critical crash rate for the study intersections.

Exhibit 3-97. Intersections with Crash Rates Exceeding the Critical Crash Rate

Intersection	Peak Hour TEV ¹	Intersection Control	Observed Crash Rate ²	Weighted Average Crash Rate ³	Critical Crash Rate ⁴	Observed Greater than Critical?
1. W Valley Highway E/Jovita Blvd/Stewart Rd SE (8th St E)	1,885	Signal	0.87	0.4	0.68	Yes
31. SR-162/Pioneer Way E	1,825	Signal	0.9	0.4	0.69	Yes
2. SR-167 SB Ramps/Stewart Rd SE (8th St E)	1,600	Side-Street Stop	1.3	0.34	0.62	Yes
10. 136th Ave E/24th St E	1,280	Side-Street Stop	1.03	0.34	0.66	Yes

1. Total Entering Vehicles. Total Entering Vehicles.

2. Crashes per Million Entering Vehicles (MEV).

3. Calculated according to Equation 4-10 in the *Highway Safety Manual*, 2010.

4. Calculated according to Equation 4-11 in the *Highway Safety Manual*, 2010.

Source: City of Sumner, 2015

As shown in Exhibit 3-97, four of the 46 study intersections had an observed crash rate higher than the intersection's critical crash rate. No all-way stop-control intersections had observed crash rates higher than critical crash rates.

Collision Summary

The intersections identified in Exhibit 3-97 have observed crash rates higher than the critical crash rate and consistent with guidance provided in the Highway Safety Manual, these locations are flagged for further review. The type and severity of reported collisions provides insight into the circumstances that resulted in higher crash rates at these intersections. Exhibit 3-98 summarizes the type and severity of

reported collisions reported during the study period at the intersections identified for further review based on the critical crash rate analysis.

Exhibit 3-98. 2011-2013 Collision Types for Intersections Exceeding Critical Crash Rate

Intersection	Type of Collision							Severity		
	Rear-End	Turn-ing	Fixed Object	Angle	Side-swipe	Ped/Bike	Other	PDO ¹	Injury	Fatality
1. W Valley Highway										
E/Jovita Blvd/Stewart Rd SE (8th St E)	3	9	0	1	2	0	0	11	4	0
31. SR-162/Pioneer Way E	11	3	1	0	0	0	0	12	3	0
2. SR-167 SB										
Ramps/Stewart Rd SE (8th St E)	3	2	1	12	0	0	1	15	4	0
10. 136th Ave E/24th St E	1	3	1	7	0	0	0	11	1	0

1. Property damage only.

Source: City of Sumner, 2015

As shown in Exhibit 3-98, the most frequent type of collision at the W Valley Highway/Jovita Boulevard/Steward Road SE intersection was turning. This signalized intersection has permitted left-turn phasing and as volumes increase consideration of protected left-turn phasing could be considered to minimize turning collisions. At the unsignalized SR 167 SB Ramps/Steward Road SE and 136th Avenue E/24th Street E intersections, the most common collision type was angled. This type of collision is common at side-street stop controlled intersections where it is difficult for side street traffic to enter the traffic stream due to high traffic volumes or speeds on the major street. Both of these intersections operate at LOS F and would meet the MUTCD criteria for the four- and eight-hour signal warrants. Provision of traffic signals would reduce the occurrence of angle collisions. Rear-end collisions were the most frequent type at the SR 162/Pioneer Way E intersection. This type of collision is common at signalized intersections, where there is stop-and-go traffic and when drivers may rapidly alter vehicle speeds while approaching the intersection in response to signal timing changes or turning vehicles.

Transit Service and Rail Service

The City of Sumner Transportation Plan includes projects for enhancing transit facilities and suggested service improvements. The facility improvements are summarized and illustrated in Figure 5-7 of the 2015 Sumner Transportation Plan. The suggested changes in transit service to the area are consistent with Sound Transit's *Express 2014 Service Implementation Plan* and *Sound Move*.

Successful use of transit and other HOV modes in the City is largely tied to the development of a regional system of HOV facilities and programs. In the vicinity of the City, the *Washington State Highway System Plan: 2007-2026* identifies several HOV projects. The WSDOT projects under construction include southbound HOV lanes on SR 167 between 8th Street to 277th Street (Project R-2), Puyallup River bridge replacement on SR 167 northbound (Project R-X), Puyallup River bridge (McMillin Bridge) replacement on SR 162 (Project R-X). Other projects identified in the state's 20 year plan include:

SR 162/Orting Area - Construct Pedestrian Tunnel (Project R-X) – construction is not funded, Pierce County is leading the project to construct a dedicated pedestrian evacuation route from Orting school campuses to a safe location on the Orting Plateau in the event of a Lahar; and

SR 167/SR 509 to I-5 Stage One - New Freeway (Project R-X) – the project is funded for some preliminary engineering and right-of-way – construction not funded - it is anticipated that only Stage One of SR 167 Extension would be completed within the next 20 years. Stage One includes one lane in each direction from the existing SR167 terminus at the Meridian interchange in Puyallup to I-5. There will be two lanes in each direction from the I-5/SR 167 Extension to SR 167 / 54th Avenue; and

SR 167 Auburn to Puyallup HOT lane extension (Project R-X). Extends the HOT lanes from 8th St E (Jovita Blvd) on SR 167 northbound lanes to 15th St SW in Auburn. This project is unfunded.

To enhance existing transit service, additional north-south transit service across the County line is desirable, particularly between Sumner and the employment centers in the Green River Valley. Evaluation of the forecast travel patterns indicate that more direct transit service is needed between the Sumner area and major employment centers in Kent, Auburn, and the Renton Valley Industrial area. Sound Transit currently offers transit service to the Green River Valley from the Sumner area with the Sounder Commuter Rail and ST Express Route 587. Local routes should also be evaluated to increase mobility options for residents who are not peak-hour commuters and park-and-ride lot users.

Sound Transit is currently studying options to increase accessibility to the Sumner Sounder Station. Options studied include adding a parking garage facility near the station, enhance walkways within $\frac{1}{4}$ mile of the station and enhance bicycle access within $\frac{1}{2}$ mile of the station. An Environmental Impact Statement (EIS) has been prepared and will be completed prior to the adoption of this document. If possible, all improvements identified in the Final EIS will be included in this Plan.

The City of Sumner should also coordinate with transit agencies and work with other jurisdictions, such as Bonney Lake, to evaluate future transit routes to serve downtown Sumner. Sound Transit Route 596 serves both Sumner and Bonney Lake, but is only a weekday peak period route. Increased frequency of bus service between neighboring residential communities should be evaluated as Sumner is projected to become more of an employment center in the future.

Transit Service

Sound Transit provides bus service in the City of Sumner (Figure 3-6 in the 2015 Sumner Transportation Plan). The majority of the routes provide transit service to the Sumner Sounder Train Station facility located on the west side of Traffic Avenue at Maple Street. Based on Sumner 2014 conditions, transit routes that serve the Sumner Train Station include Routes 577/578 and 596. In addition, Pierce County provides Beyond the Borders Connector bus service for eligible residents to public transportation, medical services, employment, shopping, and social activities. Sumner area transit route descriptions and service characteristics are shown on Figure 3-6 of the 2015 Sumner Transportation Plan.

Route 577/578 provides service between Seattle to Puyallup. This is intended to be a train shadow and currently runs with stops in Puyallup, Sumner, Federal Way, and has three stops in Seattle. The route operates on 30 minute headways on weekdays and hour headways on weekends.

Route 596 provides shuttle service between Bonney Lake Park and Ride to Sumner Sounder Station. The route operates on 20-30 minute headways on weekdays and no weekend service. This route is scheduled in coordination with the train schedule to shuttle commuters to and from the Bonney Lake Park and Ride.

Beyond the Borders Connector

Pierce County provides a local bus service called Beyond the Borders, which helps eligible residents access public transportation, medical services, employment, shopping, and social activities. There is no cost to riders. Use of the service is unlimited and riders can get on and off at all stops throughout the community and ride multiple times each day.

Commuter Rail Service

Sound Transit's Sounder line offers commuter rail service between Lakewood and downtown Seattle with stops in Tacoma, Puyallup, Sumner, Auburn, Kent, and Tukwila. Sound Transit's Sounder service shares the Burlington Northern Santa Fe (BNSF) tracks. The Sumner Station is located south of Maple Street between Narrow and Traffic Streets in downtown Sumner. The station opened in September 2000 and was part of the first phase of Sound Transit's program to provide commuter rail service between Everett and Lakewood. There are currently eight morning and two afternoon trains serving the Sumner Station during the commute hours. Ten morning and ten afternoon trains are planned within the next three years. According to Sound Transit, 352 total parking spaces are available near the Sumner commuter rail station with an additional 529 parking spaces proposed as part of Sound Transit's Sumner Access Improvement Project.

Weekly ridership on the Sounder commuter trains has increased steadily since its start-up in September 2000. Ridership has more than doubled from 5,900 passengers in September 2000 to almost 13,000 passengers in 2014.

A new road called Station Lane has recently been built to link Thompson and Harrison Streets on the west end of the fire station. This new road provides a direct route to and from SR 410 for commuter traffic accessing the rail station. Traffic Avenue has recently been reconstructed to improve traffic circulation in the station area. Traffic Avenue was widened to four lanes with a landscaped median and dedicated left turn lanes. A drop-off lane provides access to the train station off Traffic Avenue. The City is also working on a plan for the neighborhood surrounding the station. The plan will address the future of the neighborhood in its relationship to the train station. Issues to be addressed by the plan include opportunities for transit-oriented development, and parking demand with increased commuter rail service.

Freight Train Traffic

The BNSF railroad lines run north-south through the City of Sumner. The Union Pacific (UPRR) line is located on the west side of the White (Stuck) River, paralleling SR 167. The BNSF rail line is located on the east side of the White (Stuck) River and runs through downtown Sumner paralleling Traffic Avenue. Sound Transit's Sounder Service uses BNSF tracks. There are currently 41 trains that run through Sumner on the BNSF tracks and 10 trains on the UPRR line. The projected rail system use by 2035 is 62 on the BNSF tracks and 27 on the UPRR tracks.

Pedestrian and Bicycle Facilities

The City's existing transportation system was historically designed and constructed for vehicular traffic. Sidewalks exist along some of the study area arterials. Where sidewalks are not available, pedestrians must use the roadway shoulders. The majority of the roadways that have sidewalks are located within Sumner's central business district and nearby neighborhoods.

- Arterial and collector roadways that currently have sidewalks include:
- Main Street (Traffic Avenue to 158th Avenue Court East)
- Valley Avenue (SR 410 to Elm Street)
- Fryar Avenue (Puyallup Street to Main Street)
- Traffic Avenue (Main Street to Thompson Street)
- Thompson Street (Traffic Avenue to Alder Avenue)
- Alder Avenue (Main Street to Thompson Street)
- 142nd Avenue E (24th Street E to Tacoma Avenue)
- Wood Avenue (Southern terminus to Zehnder Street)
- Meade McCumber (158th Avenue East to Wood Avenue)
- Rivergrove Drive (SR-162 to 72nd Street East)
- Puyallup Street (Fryar Avenue to East Valley Highway East)
- East Valley Highway East (Elm Street East to Salmon Creek)
- Elm Street (Wright Avenue to 154th Avenue Court East)
- Parker Road East (Daffodil Street Court East to 59th Street Court East; and Main Street to Meade McCumber Road East)
- Washington Street (Parker Road East to Wood Avenue)
- West Valley Highway East (SR-167 overpass to 38th Street East; and 3300 block to 2800 block)
- 24th Street East (136th Avenue East to White River/Sumner Link Trail)
- 136th Avenue East (2500 Block to city limits)
- 8th Street East (White River/8th Street Bridge to city limits)
- 64th Street East (158th Avenue East to 16200 block)

Many arterials provide paved or gravel shoulders for pedestrians; however, several major roadways have limited or nonexistent pedestrian facilities of any sort. These roadways include portions of West

Valley Highway, East Valley Highway, Forest Canyon Road, 160th Avenue E, Elm Street, 64th Street, and Sumner-Tapps Highway.

There are limited formal bicycle facilities in Sumner. For the most part, bicyclists share the road with motorized traffic or use paved roadway shoulders, where available. Formal bike lanes are present on both sides of Valley Avenue and both sides of Fryar Avenue from Main Street to the Fryar Avenue Bridge.

Transportation Demand Management Program

The City of Sumner has adopted a CTR program. The CTR program establishes goals consistent with State legislation. The individual demand management strategies that are typical elements of the CTR and TDM programs are different for employment and residential developments. The following discussion highlights elements of a TDM program for a broad spectrum of employment- and residential-based developments.

Impacts

Methodology: Travel Demand Model

Primary analyses of the 2035 traffic forecasts were initially based on the following travel forecasting assumptions:

1. Committed Improvement projects in the City of Sumner's current Transportation Improvement Program (TIP);
2. Improvement projects in available transportation plans from adjacent jurisdictions;
3. Puget Sound Regional Council's (PSRC) Transportation 2040 Update Regional Capacity Projects List (as of May 7, 2014) and PSRC's 2035 travel demand model network coding;
4. WSDOT's improvement project descriptions from the WSDOT web site;
5. City of Sumner's forecast land use data (for three alternatives);
6. PSRC 2035 Land Use Targets forecasts and regional trip end data from the 2035 regional travel demand model.

Transportation Network Assumptions

Based on these assumptions, travel forecasts were developed for the Sumner area through an update of the prior City of Sumner travel demand model. The 2015 Sumner travel demand model included revising the prior 2030 transportation network assumptions to reflect current regional assumptions based on the Vision 2040 regional plan. Land use forecasts were also adjusted to a 2035 horizon year.

Exhibit 3-99 describes the future baseline roadway system improvement projects that were assumed to be completed as part of the 2035 transportation system. The improvement projects were input into the model for each of the land use alternatives.

Alternative roadway projects were then evaluated in order to understand the effect they would have on travel patterns within the citywide study area and in the East Sumner Planning Area. One major citywide alternative included extending 24th Street E from approximately 148th Avenue E to East Valley Highway. The extension would be a second phase of the 24th Street E corridor project identified in the 2002 Sumner Transportation Plan. The City has already initiated design of the phase 1 improvement between 142nd Avenue E to 148th Avenue E which includes a bridge over the White (Stuck) River. The phase 1 project will provide access to/from the Sumner Golf Course site, which has been recently designated to be redeveloped as industrial land uses. The phase 2 extension would take 24th Street E over the existing rail line and provide a five lane arterial between West Valley Highway and East Valley Highway serving the City of Sumner's industrial area. The extension of 24th Street E to East valley Highway was evaluated for all three land use alternatives.

The second transportation alternative that was evaluated is in the East Sumner Planning Area and is only included with Alternative 3 (Assertive Action). It includes construction of a new two to three lane arterial between 160th Avenue E and Sumner-Tapps Highway. With construction of the new 62nd Street E

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roadway, Main Street E (60th Street E) would be closed just west of Sumner-Tapps Highway. The existing intersection of Main Street E (60th Street E) at Sumner-Tapps Highway has a relatively poor alignment and limited sight distances. Left-turns from eastbound Main Street E (60th Street E) to northbound Sumner-Tapps Highway are not allowed and are physically restricted with curbing within Sumner-Tapps Highway.

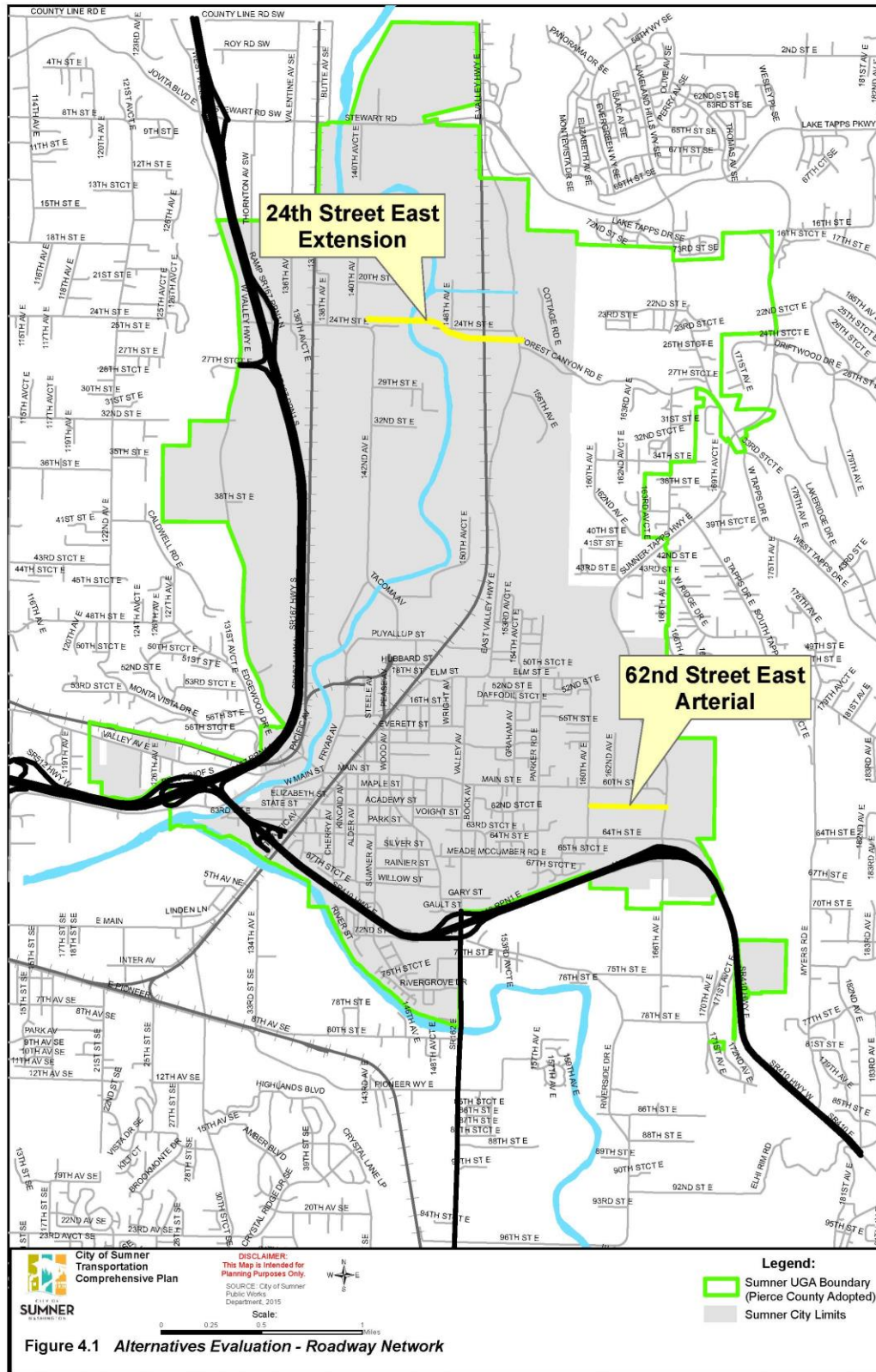
Exhibit 3-100 illustrates the locations of these two alternatives. Additional improvements at intersections were evaluated as part of the traffic operations analyses to develop the transportation improvement program. These changes would not greatly affect the overall travel patterns in the City or region.

Exhibit 3-99. 2035 Baseline Model: Assumed Transportation Capacity Improvements

Roadway	Project Limits	Project Description
SR 167 Extension	I-5 to SR 161	Phase 1 improvement including 1 lane in each direction between the existing SR 167 freeway terminus at the Meridian interchange in Puyallup to I-5. There will be two lanes in each direction from the I-5/SR 167 Extension to SR167/54th Avenue. (WSDOT)
SR 167	SR 410 to 15th Street SW/NW	Extend HOV/HOT lanes from current termini to SR 410 in Sumner. (WSDOT)
Canyon Road Widening	Pioneer Way E to 99th Street Court E	Widen existing arterial in phases (Pierce County)
Canyon Road Extension	Pioneer Way E to SR 167 Extension/ Puyallup River	Construct new major arterial between existing Canyon Road to interchange with new SR 167 Extension crossing over 2 railroad lines and the Puyallup River (Pierce County)
SR 161	24th Street E to 36th Street E	Widen roadway to five lanes. (City of Edgewood)
I-5	Various	Add HOV/HOT lanes (WSDOT)
SR 512	I-5 to Meridian Street	Convert shoulders to serve as additional lane during peak periods in peak direction of travel. (WSDOT)
Rhodes Lake Road Extension	198th Avenue E to SR 162	Construct new arterial (Pierce County)
198th Avenue E	S Prairie Road to Tehaleh Master Planned Development	Complete Tehaleh Phase 1 improvements including construction of "missing link" north of Rhodes Lake Road and widening south of Rhodes Lake Road. (Pierce County/private)
SR162	SR 410 to 96th Street E	Widen southbound direction from one lane to two lanes. Note: PSRC project calls for widening in both directions; however, prior discussions with WSDOT indicated only southbound would be initially widened. (WSDOT)
136th Avenue E	24th Street E to 16th Street E	Improve to minor arterial standards with three lanes. (City of Sumner)
Bridge Street Bridge Replacement	Bridge Street at White River	Replace existing steel truss bridge. (City of Sumner)
Stewart Road (8th Street East)	East Valley Highway to West Valley Highway	Widen to five lanes including bridge over White (Stuck) River. (City of Pacific, City of Sumner, Pierce County)

Source: City of Sumner, 2015

Exhibit 3-100. Alternatives Evaluation – Roadway Network



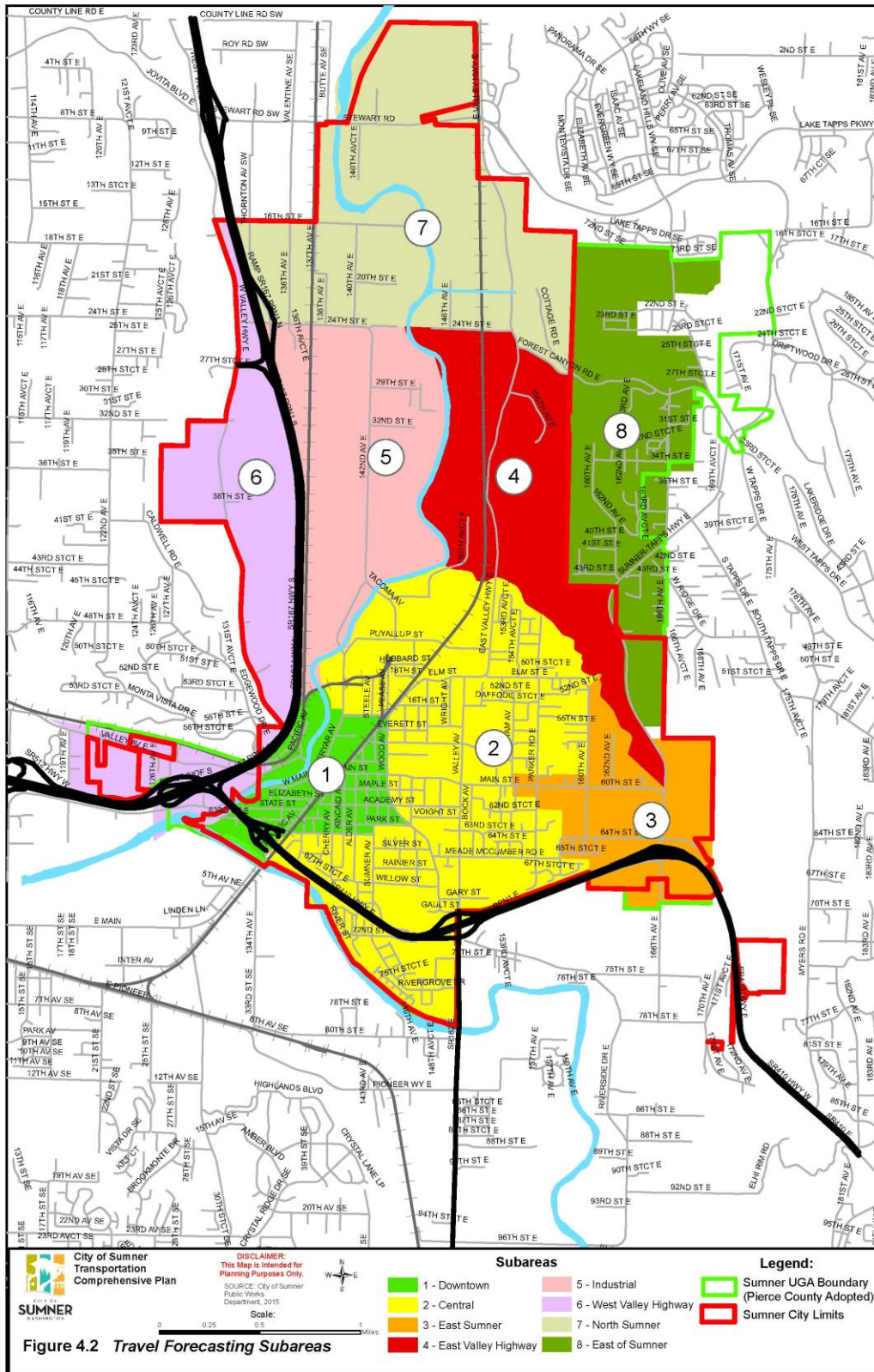
Source: City of Sumner 2015

Land Use Data

As part of the 2015 Comprehensive Plan, the City's project team developed 2035 forecasts of land use growth throughout the City and its UGA. The 2035 land use data built upon other recent studies by the City, including the designation of the Sumner Meadows golf course and surrounding areas for industrial and commercial development. Three land use alternatives were prepared to evaluate different levels and types of growth in the City. The alternatives included changes being considered as part of the East Sumner Neighborhood Plan, as well as changes in the level of development of residential and employment in various other areas of the City and its UGA.

Exhibit 3-102 summarizes 2035 land use data by district within the City and districts immediately adjacent to the City. Exhibit 3-101 illustrates the boundaries of these districts. The land use data are based on the model transportation analyses zones (TAZs) and do not specifically match the planned East Sumner Neighborhood Plan or other subareas of the City or its UGA.

Exhibit 3-101. Travel Forecasting Subareas.



Source: City of Sumner, 2015

Exhibit 3-102. 2035 Land Use Summary

Households (Dwelling Units)					Employment				
Map ID # ¹	Subarea	Households			Map ID # ¹	Subarea	Employees		
		No Action	Minimal Rezone	Assertive Action			No Action	Minimal Rezone	Assertive Action
		Alt 1	Alt 2	Alt 3			Alt 1	Alt 2	Alt 3
1	Downtown	813	870	927	1	Downtown	1,767	1,870	1,870
2	Central	4,247	4,247	4,247	2	Central	3,253	3,422	3,422
3	East Sumner	1,002	1,111	1,256	3	East Sumner	1,102	1,314	1,453
4	East Valley Hwy	126	126	126	4	East Valley Hwy	747	951	951
5	Industrial Area	112	112	112	5	Industrial Area	3,393	4,111	4,111
6	West Valley Hwy	447	447	447	6	West Valley Hwy	3,025	3,597	3,597
7	North Sumner/ Sumner Meadows Golf Course	333	333	159	7	North Sumner/ Sumner Meadows Golf Course	8,825	10,267	10,430
8	East of Sumner	1,369	1,369	1,369	8	East of Sumner	37	37	37
Sumner Study Area Total²		8,449	8,615	8,643	Sumner Study Area Total²		22,149	25,569	25,871

1. See Figure 4-2. The land use data are based on the model transportation analyses zones (TAZs) and do not specifically match the planned East Sumner Neighborhood Plan or other subareas of the City or its UGA.

2. City total plus the surrounding area total (total of Districts 1 through 8).

Source: City of Sumner, 2015

HOUSING

As previously noted, the districts summarized in Exhibit 3-101 do not directly correspond to the City limits and UGA boundaries, but do provide a general level of development in and around the City of Sumner expected by 2035. By 2035, the City anticipates that there will be 8,400 to over 8,600 dwelling units within the City and surrounding study area. The majority of the residential land uses will continue to be in the Central Sumner subarea (District 2), with over 4,200 dwelling units. This represents approximately one-half of the long-range dwelling units in the City and UGA. The hillside area east of Sumner (District 8) will have nearly 1,400 dwelling units by 2035, which represents approximately 15 percent of the total units. The land use alternatives did not affect these two districts.

East Sumner is projected to have between 1,000 and 1,250 residential units depending on the land use alternative (District 3). The No Action (Alternative 1) has the lowest forecast housing units and the Assertive Action (Alternative 3) has the highest with 25 percent more units in East Sumner compared to the No Action Alternative.

The number of housing units in the Sumner downtown area increase by approximately 12 percent with the Assertive Action (Alternative 3) compared to No Action (Alternative 1). The relative changes are, however, relatively minor in terms of projected traffic generation.

The other districts have much lower levels of housing forecast. Furthermore, there are no differences forecast in 2035 housing units in Districts 4, 5, or 6. Under the Assertive Action (Alternative 3), the level of residential growth in North Sumner (District 7) is estimated to be approximately one-half of the level of housing under the No Action (Alternative 1) and Minimal Rezone (Alternative 2).

EMPLOYMENT

Forecast employment in Sumner and adjacent areas is expected to be in the range of 22,000 to 26,000 by 2035. The highest level of employment will be in the North Sumner/Sumner Meadows Golf Course area (District 7) with 8,800 to 10,400 employees by 2035. Much of this area was designated by the City for light industrial, manufacturing, and commercial land uses in 2014. The Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) scenarios would have 15 to 20 percent more employees in the district compared to the No Action (Alternative 1) due to employment sector mix assumptions summarized in Chapter 2.

Districts 2, 5, and 6 (Central, Industrial Area and West Valley Highway, respectively) are also planned to accommodate relatively high levels of employment by 2035. Each of these districts is forecast to have approximately 3,000 to 4,100 employees by 2035. All three of these districts are forecast to have greater levels of employment under the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) scenarios compared to the No Action (Alternative 1).

Employment in the East Sumner Planning Area also is expected to be higher under the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) scenarios compared to the No Action (Alternative 1). The highest number of employees in the subarea would occur under the Assertive Action (Alternative 3) which would include City investments in transportation (such as the new 62nd Street E) and other infrastructure to support increased development. Retail and other commercial development would be the predominate types of employment in the East Sumner Neighborhood Plan subarea (District 3).

Employment in the City of Sumner Downtown (District 1) and East Valley Highway (District 4) would be lower than the above subareas. Employment in these two districts would be similar under all three alternatives, with slightly higher levels under the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) scenarios. The downtown area would have retail and commercial employment while the East Valley Highway corridor would be predominately light industrial or manufacturing type of employment.

District 8, the east hillside above East Valley Highway, is not expected to have any significant levels of employment under any of the three land use alternatives.

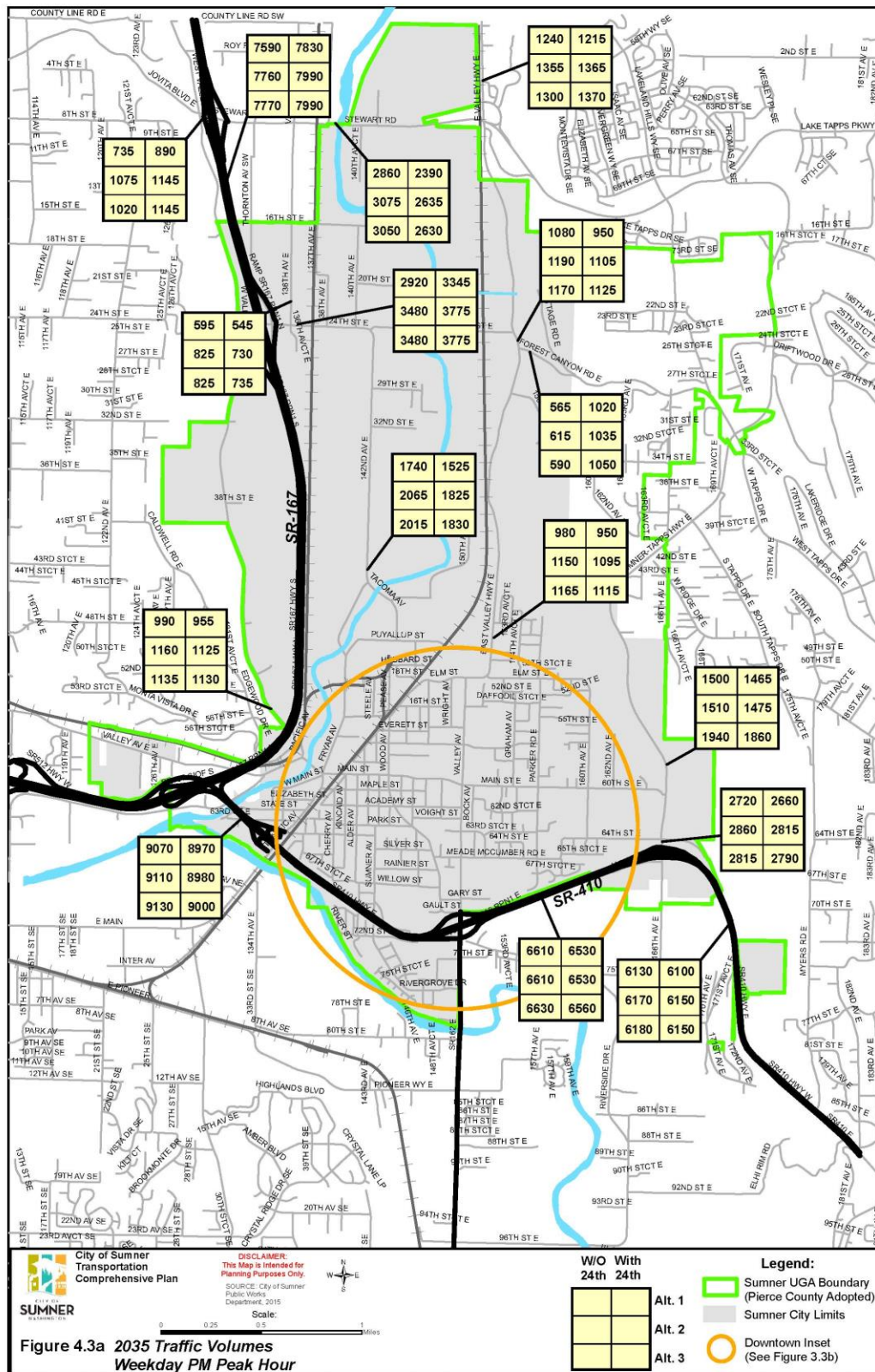
Impacts Common to All Alternatives

Citywide

Six transportation/land use alternatives were evaluated as part of developing the 2015 Sumner Transportation Plan. Each of the three land alternatives was modeled without and with the extension of 24th Street E to East Valley Highway. In addition, construction of a new 62nd Street E arterial between Sumner-Tapps Highway and 160th Avenue E in the East Sumner Neighborhood Plan area was included in the development and evaluation for 2035 traffic forecasts for the Assertive Action (Alternative 3).

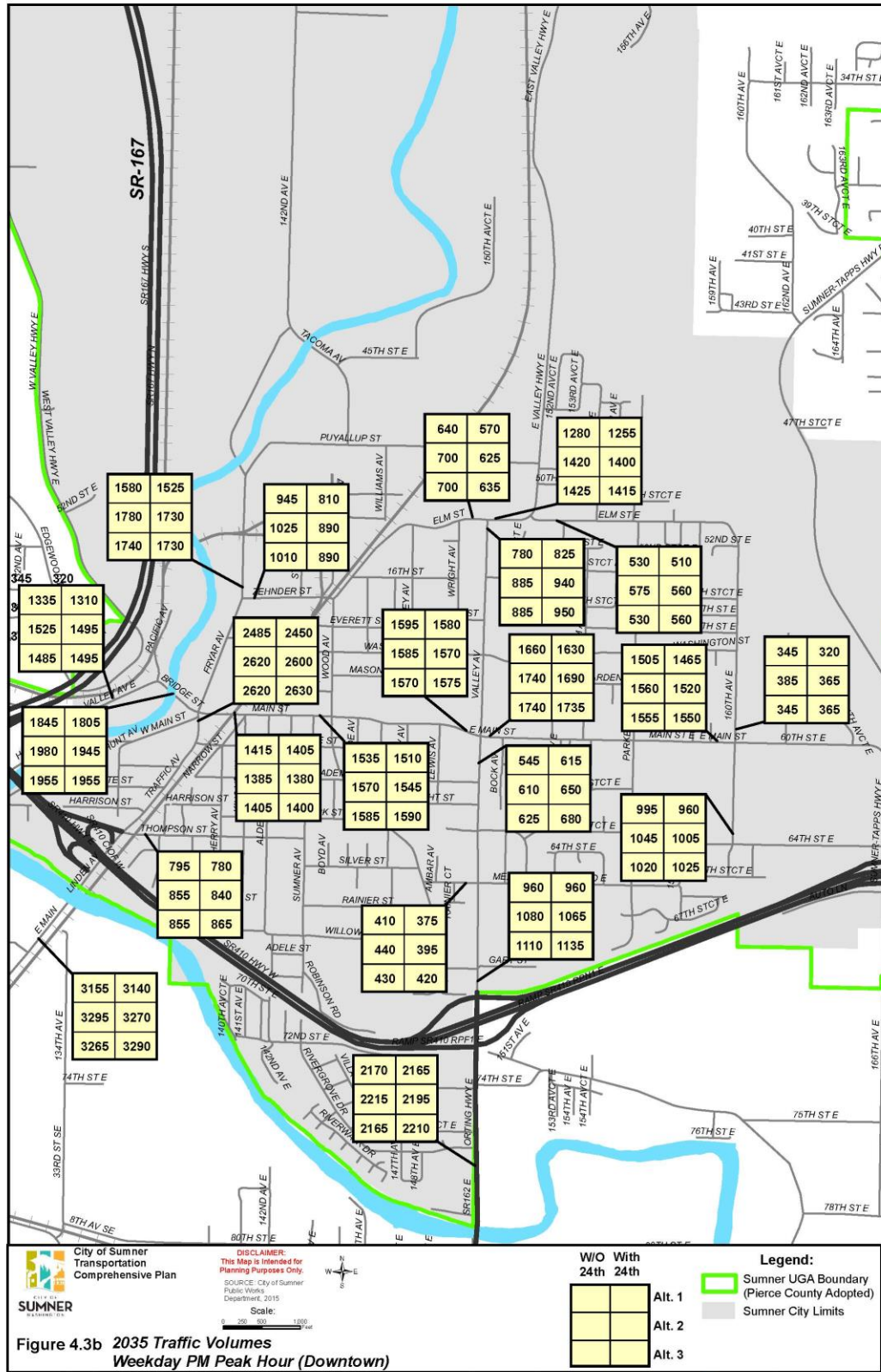
The resulting PM peak hour traffic forecasts for the six 2035 alternative forecasts are shown on Exhibit 3-103 and Exhibit 3-104. The following describes key findings of the alternatives evaluation.

Exhibit 3-103. 2035 Peak Hour Traffic



Source: City of Sumner 2015

Exhibit 3-104. 2035 Peak Hour Traffic Volumes (Downtown Inset)



Source: City of Sumner, 2015

2035 FORECAST TRAFFIC IMPACTS OF LAND USE ALTERNATIVES

Trip generation was developed through the modeling process, which converts estimates of housing and employment (by category) into daily person trips by trip purpose for each TAZ. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model.

Traffic volumes increase over time under all alternatives. The higher levels of development under the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) alternatives results in somewhat higher weekday PM peak hour traffic generation compared to the No Action (Alternative 1) scenario. For the City and adjacent areas covered by the districts shown on Exhibit 3-101, the three land use alternatives are forecast to generate the following number of vehicle trips during the PM peak hour:

- No Action (Alternative 1) – 18,300 PM peak hour vehicle trips
- Minimal Rezone (Alternative 2) – 21,750 PM peak hour vehicle trips
- Assertive Action (Alternative 3) – 21,950 PM peak hour vehicle trips

The Assertive Action (Alternative 3) results in slightly more trips generated than the Minimal Rezone (Alternative 2).

Smaller changes in PM peak hour traffic volumes are shown in the south part of the City (see Exhibit 3-104). The largest differences in PM peak hour traffic volumes in the downtown and East Sumner Neighborhood Plan Area between the three alternatives are shown along Valley Avenue between Elm Street and SR 410 and on Fryar Avenue north of Main Street. These reflect the connection of traffic generated in the north part of the City connecting within the core residential and downtown areas and to SR 410.

The three land use alternatives have relatively limited impacts on the adjacent state highways serving Sumner. As shown on Exhibit 3-103, the forecast 2035 PM peak hour volumes on SR 167 south of 8th Street E would be expected to increase by fewer than 200 vehicles per hour (vph) under the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) compared to the No Action (Alternative 1) scenario. This represents about a 2 percent increase. The forecast 2035 PM peak hour traffic volume differences on SR 410 in the Sumner area are even less, with a difference of 60 vph or fewer. Similarly, the traffic forecasts on SR 162 south of SR 410 are relatively unchanged between the three land use alternatives. In part, the relatively limited impact on traffic volumes on the state highways of the alternatives reflects the location of the changes in development in the north and east parts of the City. In addition, the limited changes in total housing units and employment levels within Sumner under the different land use alternatives are relatively minor compared to the overall 2035 land use forecasted for the north and central parts of Pierce County (including Edgewood, Puyallup, Bonney Lake, Orting and unincorporated areas of Pierce County).

24TH STREET EXTENSION TO EAST VALLEY HIGHWAY

The City is proceeding with the extension of 24th Street E across the White (Stuck) River to approximately 148th Avenue E to serve the rezoned former Sumner Meadows Golf Course site. The 2015 Sumner Transportation Plan assumed that that section between 142nd and 148th Avenues E would be constructed and therefore, was part of the baseline 2035 network. The 24th Street extension from 148th Avenue E to East Valley Highway was tested in the travel demand model for all three land use alternatives.

As shown on Exhibit 3-103 and Exhibit 3-104, the changes in forecast traffic volumes with the extension of 24th Street E to East Valley Highway are consistent with those described without the extension. For example, traffic forecasts on 8th Street E and 24th Street E are higher under the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) compared to the No Action (Alternative 1) scenario. A key difference with the 24th Street E extension is the reduction of traffic on 8th Street E and the increase in traffic on 24th Street E. Forecast volumes on 8th Street E are projected to decrease by 400-500 vph with a future 24th Street E connection to East Valley Highway. The majority of that traffic directly shows up on 24th Street E.

Forecast volumes on 24th Street E between West Valley Highway and 142nd Avenue E would be accommodated with the existing five-lane arterial. The forecast volumes on 24th Street E east of 142nd

Avenue E would require a three-lane arterial. However, specific improvements may be needed at key intersections along both of these sections of 24th Street E. These are discussed in the forecast traffic operations section and transportation improvements discussions.

The increase on 24th Street E is also directly reflected in higher 2035 PM peak hour volumes on Forest Canyon Road east of East Valley Highway. Forecast volumes on Forest Canyon Road are projected to increase by nearly 80 percent compared to the forecasts without the 24th Street E Extension. The increase in traffic would not require widening of Forest Canyon Road except at its intersection with East Valley Highway.

Forecast traffic volumes on East Valley Highway, Sumner-Tapps Highway, and 142nd Avenue E south of 24th Street E also decline with the addition of the 24th Street E Extension. These decreases result from traffic having an additional alternative corridor to connect with the areas east of Sumner without traveling through Sumner.

2035 TRAFFIC OPERATIONS EVALUATION

Traffic operations were evaluated based on intersection operations and the HCM methodology consistent with the existing conditions analysis. Specific intersection improvements were assumed based on the assumptions outlined at the beginning of this chapter and the transportation network alternative being evaluated. Traffic signal timing was optimized for each land use/network alternative in consideration of changes that would occur with intersection maintenance to address growth in traffic volumes. A summary table of study intersection LOS and delay for each Alternative is provided in the Draft Transportation Plan Update in Volume I.

As shown in the Transportation Plan, along 8th Street E the majority of the study intersections would operate at LOS F during the weekday PM peak hour under Alternatives 1, 2, and 3 without the extension of 24th Street E. The extension of 24th Street E to East Valley Highway alleviates some of the congestion along 8th Street E and improves intersection operations with all three alternatives. The 8th Street E/SR 167 interchange would continue to operate at LOS F conditions under all three alternatives both with and without the extension of 24th Street E. Along 24th Street E increases in traffic volumes with the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) degrade intersection operations as compared to the No Action (Alternative 1). Furthermore, the 24th Street E extension results in higher traffic volumes and further degradation in intersection operations along 24th Street E, which results in a need for additional improvements at key intersections along the corridor.

In the southern portion of the City, differences in intersection operations across all alternatives are minimal, which is consistent with the smaller changes in weekday PM peak hour traffic volumes previously described. The area where increases in traffic volumes with the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) impacts intersection operations the most is along Elm Street/East Valley Highway between Valley Avenue and Puyallup Street where operations are anticipated to be LOS E/F as compared to LOS D/E under the No Action (Alternative 1).

Given the number of intersections operating at LOS E and F with all of the alternatives, consideration will need to be given to potentially changing the City's adopted LOS standards at several intersections. Resolving the LOS deficiencies at these locations would require impacting existing businesses and would likely adversely affect the ability to safely support pedestrian and bicycle activity in the core parts of Sumner. Allowing LOS E or F conditions along certain corridors or at key locations will allow the City to focus efforts on key improvements that will impact travel within and connections outside the City. Consideration should be given to LOS E or F standards where improvements are not feasible or the character of the facility would be changed (e.g., pedestrian corridors).

East Sumner

The 2035 forecast PM peak hour traffic operations in the East Sumner Neighborhood Plan show differences associated with the closure of Main Street at Sumner-Tapps Highway and construction of the new 62nd Street E arterial as well as the need for additional transportation improvements to support the East Sumner Neighborhood Plan.

As part of the Assertive Action (Alternative 3), the City is evaluating construction of a new east-west arterial in the East Sumner Neighborhood Plan. The new arterial would be 2 to 3 lanes with the center

turn lane serving property access. The evaluation shows that a traffic signal would be needed at the Sumner-Tapps Highway/62nd Street E intersection to support the anticipated growth and shift traffic from 64th Street E to use of 62nd Street E as the primary route. The new corridor would essentially replace the existing Main Street (60th Street E) connection to Sumner-Tapps Highway. As discussed above, the intersection of Main Street (60th Street E)/ Sumner –Tapps Highway is substandard and the east-to-north left-turn movements are not permitted via a physical barrier.

The 64th Street E and SR 410 interchange with Sumner-Tapps Highway would have LOS F operations under all alternatives. Improvements could be difficult given the close spacing of the intersection. The analysis explored an alternative where the SR 410 westbound ramps were reconfigured to access 64th Street E. This configuration would alleviate some of the congestion in the interchange area and allow for additional spacing between the SR 410 eastbound ramp intersection and 64th Street E. This configuration would support all alternatives, but works best in concert with the new 62nd Street E roadway intersecting with Sumner-Tapps Highway to better distribute traffic.

Under the other alternatives (No Action and Minimal Rezone) the intersection of Sumner-Tapps Hwy/64th Street E would need to be improved to include additional turn lanes to provide adequate capacity and to reduce the negative impacts of northbound traffic queues extending to the SR 410 interchange and eastbound traffic queues along 64th Street E. The needed turn lanes include second northbound left-turn lane and left- and right-turn lanes for the eastbound and westbound approaches.

For all of the Alternatives, in order to improve the operations of the SR 410 Westbound/166th Avenue E interchange ramp intersection without reconfiguring the westbound ramps to connect to 64th Street E (as discussed above), the intersection would need to be signalized and the existing northbound left-turn only lane would need to be converted to a shared left-turn/through lane or a left-turn lane would need to be provided. This would provide two northbound lanes for through traffic. This would require two northbound lanes on Sumner-Tapps Highway at least north of the 64th Street E intersection, as described above. At the eastbound interchange ramp intersections it is recommended that the existing through lane be converted to a through/left-turn lane or an additional southbound left-turn lane be provided to accommodate the high volume of left-turns during the 2035 PM peak hour. This may require widening along 166th Avenue E and would require widening the eastbound on-ramp to two lanes which could then merge into a single lane prior to the mainline of SR 410. This may require modification and/or extending the width of the on-ramp and the merge distance on eastbound SR 410. The improvement at the eastbound ramps at the SR 410/166th Avenue E interchange is recommended for all alternatives.

In addition, other intersection improvements in the East Sumner Neighborhood Plan subareas would be needed under all three land use alternatives, with or without the extension of 24th Street E to Forest Canyon Road. These improvements include:

- Main Street/160th Avenue E – Install traffic signal under all alternatives, when warranted.
- 64th Street E/160th Avenue E - Under the No Action (Alternative 1) and Minimal Rezone (Alternative 2) a traffic signal could be provided, when warranted to better facilitate the major movements between the north and east legs of the intersection. A signal would not be needed under the Assertive Action (Alternative 3) because traffic would shift to 62nd Street E to access Sumner-Tapps Highway.
- Main Street (60th Street E) /160th Avenue E- Install traffic signal under all alternatives, when warranted. Depending on the level and pace of development in the East Sumner Neighborhood the signal would not likely be needed for many years.
- Main Street/Parker Avenue – Install a traffic signal under all alternatives. The intersection currently operates at LOS F during the PM peak hour so a traffic signal may be needed at this intersection in advance of signalizing Main Street (60th Street E)/160th Avenue E.

Impacts Specific to No Action Alternative

Citywide

Impacts are consistent with those identified under Impacts Common to All Alternatives since existing comprehensive plan policies, capital facilities plans, land use, zoning, and development regulations would be maintained. Citywide PM peak hour trips would equal 18,300 under the No Action Alternative.

East Sumner

The intersection of Sumner-Tapps Hwy/64th Street E would need to be improved to include additional turn lanes to provide adequate capacity and to reduce negative impacts of northbound traffic queues extending to the SR 410 interchange and eastbound traffic queues along 64th Street E.

Impacts Specific to the Minimal Zoning Action

Citywide

The additional housing and employment under the Minimal Rezone (Alternative 2) results in approximately 19 percent more PM peak hour trips generated in the eight districts shown in Exhibit 3-101. The higher trip generation is primarily due to additional growth in the North Sumner (District 7) and East Sumner (District 3) areas.

The area where increases in traffic volumes with the Minimal Rezone (Alternative 2) and Assertive Action (Alternative 3) impacts intersection operations the most is along Elm Street/East Valley Highway between Valley Avenue and Puyallup Street where operations are anticipated to be LOS E/F as compared to LOS D/E under the No Action (Alternative 1).

TRAFFIC OPERATIONS

Along 24th Street E increases in traffic volumes with the Minimal Rezone (Alternative 2) degrade intersection operations as compared to the No Action (Alternative 1). Furthermore, the 24th Street E extension results in higher traffic volumes and further degradation in intersection operations along 24th Street E which results in a need for additional improvements at key intersections along the corridor.

East Sumner

The intersection of Sumner-Tapps Hwy/64th Street E would need to be improved to include additional turn lanes to provide adequate capacity and to reduce negative impacts of northbound traffic queues extending to the SR 410 interchange and eastbound traffic queues along 64th Street E.

Impacts Specific to the Assertive Collaborative Action

Citywide

The additional housing and employment under the Assertive Collaborative Action (Alternative 3) results in approximately 20 percent more PM peak hour trips generated in the eight districts shown in Exhibit 3-101. The higher trip generation is primarily due to additional growth in the North Sumner (District 7) and East Sumner (District 3) areas.

Along 24th Street E increases in traffic volumes with the Assertive Action (Alternative 3) degrade intersection operations as compared to the No Action (Alternative 1). Furthermore, the 24th Street E extension results in higher traffic volumes and further degradation in intersection operations along 24th Street E which results in a need for additional improvements at key intersections along the corridor.

East Sumner

As part of the Assertive Action (Alternative 3), the City is evaluating construction of a new east-west arterial as part of the East Sumner Neighborhood Plan. The new arterial would have one lane in each direction and turn lanes, as appropriate at intersections or to serve property access. The arterial would connect between 160th Avenue E and Sumner-Tapps Highway. The new corridor would essentially replace the existing Main Street (60th Street E) connection to Sumner-Tapps Highway. As discussed above, the intersection of Main Street (60th Street E)/ Sumner-Tapps Highway is substandard and the east-to-north left-turn movements are not currently permitted via a physical barrier. The new arterial

intersection would allow the left-turns to northbound Sumner-Tapps Highway to be permitted to serve the planned growth in East Sumner.

Except for the shift in traffic from Main Street (60th Street E) to 62nd Street E there are no major changes in traffic volumes that result from construction of the new arterial. Some of the traffic that would otherwise use Main Street (60th Street E) or 64th Street E to access Sumner-Tapps Highway would shift to 62nd Street E. This shift would provide a more central arterial connection within the East Sumner Neighborhood Plan and also would serve traffic connecting to/from other areas of Sumner west of 160th Avenue E. The traffic operations analyses provides more detailed evaluation of the potential impacts and benefits of the 62nd Street E arterial and closure of the existing intersection of Main Street E (60th Street E) /Sumner-Tapps Highway intersection.

Mitigation Measures

Incorporated Plan Features

- All Alternatives would implement Transportation Element policies that address circulation system classification and design, concurrency standards, transit coordination and improvements, non-motorized facilities, financing including impact fees, and joint transportation planning, among other policies. The two Action Alternatives include implementation of the updated 2015 Transportation Element.
- Alternatives 2 and 3 include transportation improvements in the East Sumner Neighborhood. Alternative 3 includes new and existing street improvements to enhance traffic flow, pedestrian mobility and facilitate infill development consistent with the Comprehensive Plan Land Use Element and the East Sumner Neighborhood Plan
- Alternative 3, due to the significant investment in transportation infrastructure, would result in development consistent with the Urban Village Designation and vision for a compact, walkable, and mixed-use development pattern that provides a variety of transportation options.
- The City has significant capacity for new employment and housing growth in the City. The combination of housing and employment capacity allows for people to live in proximity to where they work. The proximity of employment and housing allows for shorter travel distances, greater transportation options, and mixed-use development that maximizes the efficient use of land.

Applicable Regulations and Commitments

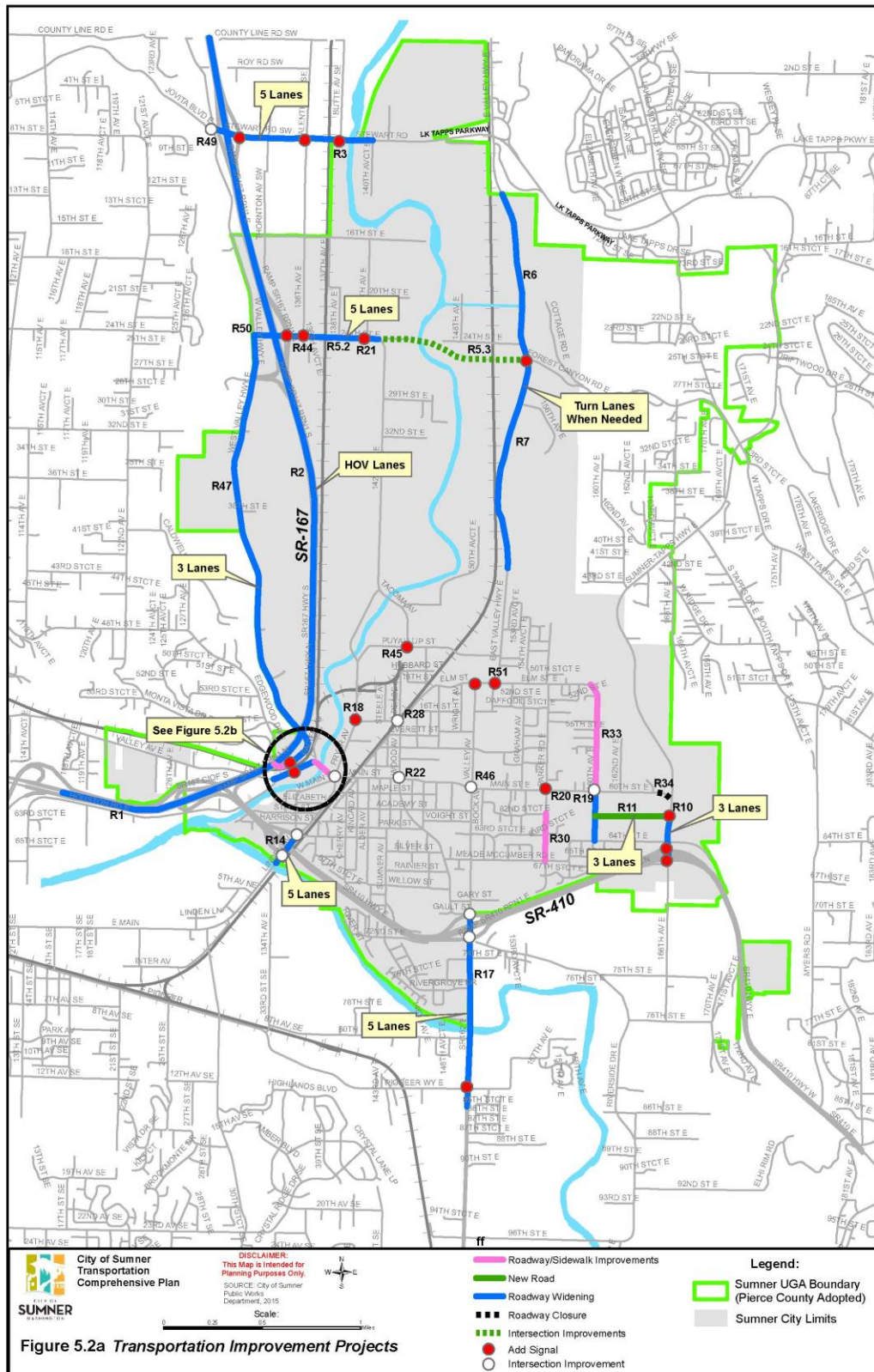
- SMC Chapter 12.36 addresses Transportation Impact Fees. This ordinance will be updated to require concurrency of improvements at the time of development or within six years.
- The City implements Chapter 16.06 Commute Trip Reduction. The Transportation Plan Update will expand on Transportation Demand Management Measures.
- The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places.
- The City collects mitigation fees for trails (see Section 3.10).

Other Potential Mitigation Measures

The Transportation Plan Update provides a comprehensive list of improvement projects and programs to meet the existing forecast transportation needs of the City. The project list covers roadways, transit, and non-motorized improvements and programs, since the overall system needs to address all needs. The projects are categorized into WSDOT freeway improvements, arterial improvements, a collector road program, transit service, and citywide transportation programs. The proposed project list identifies the roadway, project limits and a description of the needed improvements.

A map of proposed road improvements is shown in Exhibit 3-105 below and described in detail in the Transportation Plan Update.

Exhibit 3-105. Transportation Improvement Projects



Source: City of Sumner 2015

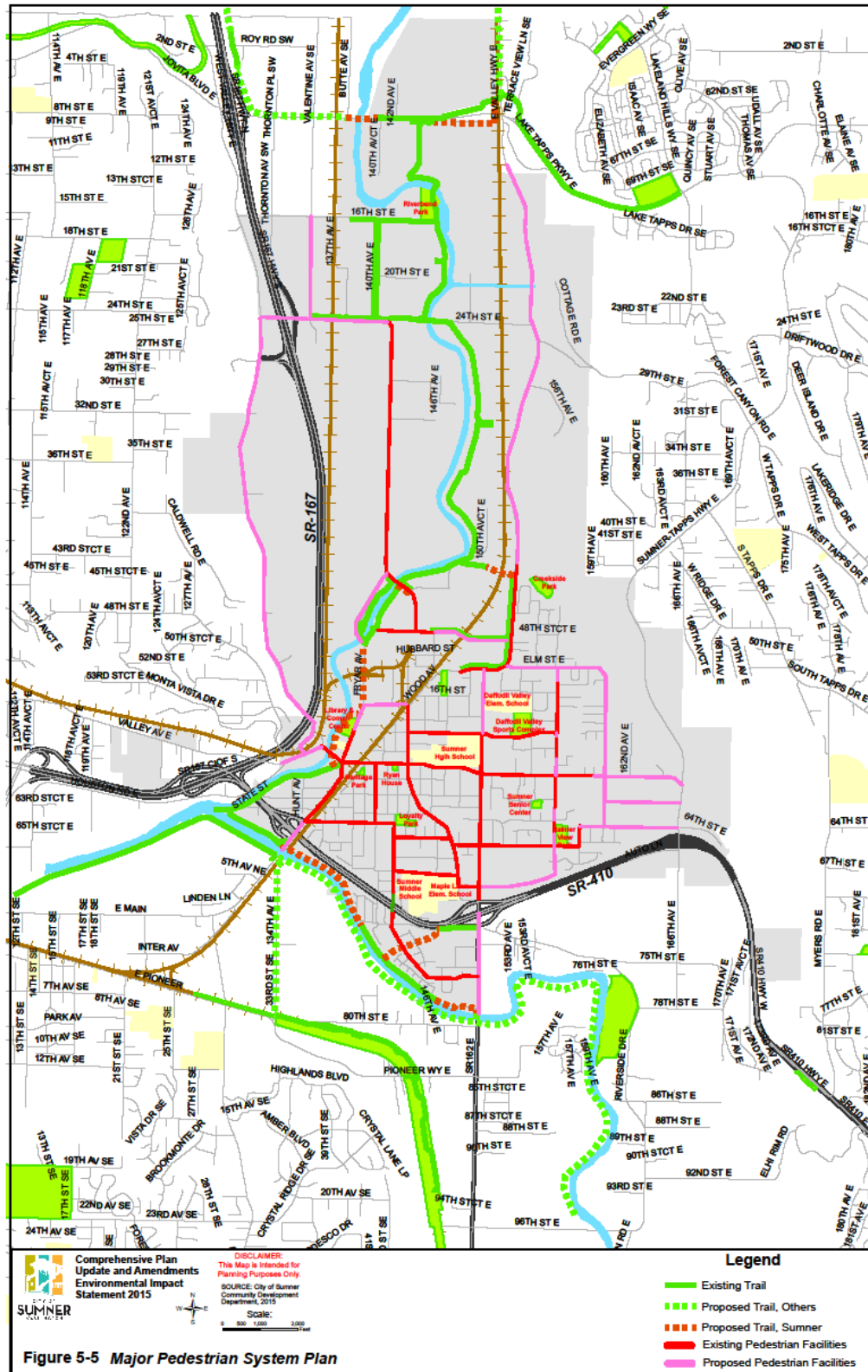
**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
AFFECTED ENVIRONMENT, IMPACTS AND MITIGATION**

Sidewalks, walkways, and trails are integral parts of the pedestrian system. The City desires to have sidewalks on both sides of all City streets, unless special circumstances on topography make it cost prohibitive. Key pedestrian improvements in the Transportation Plan Update include:

- A non-motorized overcrossing of SR 410. The non-motorized crossing is anticipated to connect Sumner Avenue to the Rivergrove area. The overcrossing is an important pedestrian and bicyclist connection and helps link the southern part of the City to the shopping and residential areas of the downtown area. In addition, the overcrossing provides an alternate route for pedestrians to cross SR 410 rather than using the existing SR 162/Valley Avenue Bridge or bridges at the other interchanges.
- The roadway improvement projects identified in the plan that involve new road construction or reconstruction include the addition of sidewalks.
- Along with the system of planned and existing sidewalks, the Sumner Link Trail is a major pedestrian facility linking the communities north of Sumner to the areas south of Sumner. The Sumner Link Trail is a Class 1 (separate right-of-way) trail along the White (Stuck) and Puyallup Rivers. The trail provides a connection to the existing King County Interurban Trail that ends just north of the County line.

When combined with the existing pedestrian facilities, the proposed sidewalks and trail will provide the major system of pedestrian facilities shown in Exhibit 3-106 below.

Exhibit 3-106. Major Pedestrian System Plan



Source: City of Sumner 2015

A good portion of the proposed bicycle system within the City of Sumner will be designated bicycle routes along the existing roadways. Bicycle routes are streets that are signed for bicycle travel. However, the project list in the Transportation Plan does include sections of the Sumner Link Trail including bicycle

facilities. Combined the Sumner Link Trail and the bicycle lanes along Valley Avenue, the bicycle routes help to provide a complete bicycle system throughout the City and connections to the regional system.

Significant Unavoidable Adverse Impacts

Increases in future development will result in increased traffic volumes. Although congestion can be addressed through the mitigation measures presented in this document, the increase in traffic itself is considered a significant unavoidable adverse impact.

4.0 ACRONYMS/ABBREVIATIONS

AADT	annual average daily traffic
BMPs	best management practices
City	City of Sumner
CO	carbon monoxide
CPPs	Countywide Planning Policies
CTR	commute trip reduction
DNR	Washington State Department of Natural Resources
DNS	determination of non-significance
Ecology	Washington State Department of Ecology
EIS	environmental impact statement
EMS	emergency medical services
EPA	U.S. Environmental Protection Agency
EPF&R	East Pierce Fire & Rescue
ESA	federal Endangered Species Act
FCC	Federal Communications Commission
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTE	full-time equivalent
GC	General Commercial
GHG	greenhouse gas
GMA	Washington State Growth Management Act
gpd	gallons per day
gpm	gallons per minute
HOV	high occupancy vehicle
HSP	highway systems plan
HSS	Highway of Statewide Significance
HUD	U.S. Department of Housing and Urban Development
IC	Interchange Commercial
LDR	Low Density Residential
LID	low impact development
LOS	level of service
MDR	Medium Density Residential
MEV	million entering vehicles
MFTE	multifamily tax exemption

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
ACRONYMS/ABBREVIATIONS**

mg	million gallons
mgd	million gallons per day
MIC	Manufacturing/Industrial Center
mph	miles per hour
MSATs	mobile source air toxics
NAAQS	National Ambient Air Quality Standards
NFIP	National Flood Insurance Program
NMFS	National Marine Fisheries Service
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OFM	Washington State Office of Financial Management
OSPI	Washington State Office of the Superintendent of Public Instruction
PCLS	Pierce County Library System
PMUD	Planned Mixed Use Development
ppm	parts per million
PSCAA	Puget Sound Clean Air Agency
PSE	Puget Sound Energy, Inc.
psi	per square inch
PSRC	Puget Sound Regional Council
RCW	Revised Code of Washington
RPAs	reasonable and prudent alternatives
SEPA	State Environmental Policy Act
SMC	Sumner Municipal Code
SO ₂	sulfur dioxide
SR	state route
TAZs	transportation analysis zones
TDM	transportation demand management
TDR	transfer of development rights
TIP	transportation improvement plan
TMDLs	total maximum daily loads
UGA	urban growth area
VMT	vehicle miles travelled
VOC	volatile organic compounds
vpd	vehicles per day
vph	vehicles per hour
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife

SUMNER COMPREHENSIVE PLAN UPDATE SEIS
ACRONYMS/ABBREVIATIONS

WRIA water resource inventory area

WSDOT Washington State Department of Transportation

WUTC Washington Utilities and Transportation Commission

WWTP wastewater treatment plant

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6.0 DISTRIBUTION LIST

Agencies noted with an asterisk (*) will receive a compact disk, direct link, or hard copy to documents. Others will be provided a notice of availability.

6.1 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. Fish and Wildlife

6.2 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

6.3 Tribes

*Puyallup Tribe

*Muckleshoot Tribe

6.4 Regional Agencies

*Puget Sound Regional Council

*Puget Sound Clean Air Agency

6.5 Counties

*Pierce County, Planning and Land Services

Economic Development Board for Tacoma and Pierce County

6.6 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

6.7 Special Districts, Transportation, and Utilities

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

6.8 City of Sumner

- *East Pierce Fire and Rescue
- *Finance (Capital Facilities)
- *Parks and Recreation
- *Police
- *Public Works
- *Sumner City Council
- *Sumner Planning Commission

6.9 Boards and Associations

- Alderton-McMillin Community Planning Board
- Puyallup River Watershed Council
- Puyallup/Sumner Chamber of Commerce
- Sumner Downtown Association
- Master Builders Association

6.10 Community Organizations

- Cascade Land Conservancy

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS
DISTRIBUTION LIST**

Futurewise

Audubon Society

Trout Unlimited

6.11 Newspapers

Bonney Lake and Sumner Courier-Herald

Tacoma News Tribune

6.12 Citizens and Property Owners

The City is distributing notices to interested citizens and property owners adjacent to proposed specific rezone areas.

APPENDICES

Appendix A: Determination of Significance/ Scoping Notice

Appendix B: Growth Targets and Capacity Analysis

Appendix C: Planned Action Ordinance

Appendix D: Agricultural Land Analysis

APPENDIX A

Determination of Significance/ Scoping Notice

CITY OF SUMNER

DETERMINATION OF SIGNIFICANCE & SCOPING NOTICE

2015 City Comprehensive Plan and East Sumner Subarea Plan Updates

Request for Comments on the Scope of the Supplemental Environmental Impact Statement (SEIS)

Description of Proposal

The City of Sumner will be updating its Comprehensive Plan by June 30, 2015 in accordance with the Growth Management Act. As part of the update, the City will be considering a citywide growth horizon to the year 2035, amended policies addressing Growth Management Act, Countywide Planning Policies, and VISION 2040 provisions.

Plan Elements: Key amendments to the Comprehensive Plan's elements that will be considered include but are not limited to:

- Updates to the Sumner Vision Statement;
- Updates to the Capital Facilities Plan per GMA to include new capital improvement projects (CIPs) in functional plans (sewer, water, transportation) and a review of Level of Service standards;
- Completion of a Best Available Science (BAS) review with amendments to Critical Areas Regulations if needed;
- Updates to the Transportation Plan including updating the transportation model as well as goals and policies per GMA; and
- Housekeeping amendments and updates to text and goals/policies/objectives consistent with the City's review of its plans in light of state and regional goals and plans as well as community vision and needs.

Land Use, Zoning, and Development Regulations: Amendments to the Comprehensive Plan land use map, zoning map and development regulations would also be considered, including but not limited to:

- Adjustment to the City's Urban Service Area to match the City's 2010 boundaries consistent with Pierce County Comprehensive Plan;
- Updates to the East Sumner Neighborhood Plan (see further description below);
- Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue;
- Change in designation and zoning of Multi-family designated land to manufacturing (M-1) along the East Valley Highway;
- An amendment to the Zoning Code (Title 18) to address the siting of essential public facilities (EPFs) per RCW 36.70A.200;
- An amendment to development regulations to require concurrency per RCW 36.70A.070(6)(b);
- An amendment to the timeframe for extending or encumbering impact fees per RCW 82.02;
- Amendments to Critical Areas Regulations if needed;
- Consideration of docket requests pursuant to the SMC 18.56.147; and

- Other miscellaneous clean-up and housecleaning modifications to the land use plan, zoning, and development regulations.

East Sumner Neighborhood Plan: The City will also be updating the East Sumner Neighborhood Plan. The East Sumner Neighborhood Plan Update will result in planning level proposals for road improvements, land use regulations, environmental protection, pedestrian and bicycle paths and other possible City measures. It is anticipated that the actions under consideration would alter the City's Comprehensive Plan land use plan and land capacity, as well as transportation plan assumptions.

Location of Proposal

The proposal encompasses the Sumner city limits and the Sumner Urban Service Area, collectively called the Sumner Planning Area. The East Sumner Subarea Plan will be focused on the East Sumner Neighborhood approximately between Parker Road and Sumner Tapps Highway and from Salmon Creek on the north to SR 410 on the south.

Proponent & Lead Agency

The proponent and lead agency of the proposal is the City of Sumner.

EIS Required

The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. A supplemental environmental impact statement (SEIS) is required under RCW 43.21C.030 (2)(c) and will be prepared. The SEIS will supplement the Final Environmental Impact Statement prepared for the City of Sumner Comprehensive Plan Update and Amendments, November 2010. The SEIS will also consider other recent SEPA documents for Comprehensive Plan amendments.

Elements of the Environment to be Addressed

The lead agency has identified the following areas for discussion in the SEIS: natural environment (including earth, flooding, water quality, and plants and animals); air quality and greenhouse gas (GHG); land use; population, employment and housing; relationship to plans and policies; transportation; and public services, capital facilities and utilities.

Conceptual Alternatives

A comparative evaluation of alternative courses of action for the City as a whole (including a no-action alternative) will be considered. A series of alternative land use concepts for the East Sumner Neighborhood will be considered within the citywide alternatives as well.

Scoping

Agencies, affected tribes, and members of the public are invited to comment on the scope of the SEIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Written comments must be submitted no later than **5:00 pm August 29, 2014** to Ryan Windish, Sumner Community Development Department, 1104 Maple Street, Suite 250, Sumner, WA 98390.

Agencies, affected tribes, and members of the public are also invited to a **public scoping meeting** sponsored by the City of Sumner Community Development Department to discuss the Comprehensive Plan update and be part of an interactive discussion to shape alternative planning concepts for the East Sumner Neighborhood. The meeting is scheduled for: **August 19, 2014, 7:00 pm**, in the Sumner Senior Center, 15506 62nd Street Court East Sumner, WA 98390.

Responsible Official

Designated SEPA Responsible Official

Paul Rogerson, Community Development Director
City of Sumner
1104 Maple Street
Sumner, WA 98390-1423

Phone: 253-299-5521
Fax: 253-299-5509
E-mail: paulr@ci.sumner.wa.us

Signature: _____

Date: _____

NOTICE

APPLICATIONS NOW BEING ACCEPTED FOR CITY OF SUMNER COMPREHENSIVE PLAN AND/OR ZONING CODE AMENDMENTS



THE CITY OF SUMNER is now accepting applications for amendments to the Sumner Comprehensive Plan and/or Zoning Code. Amendments to the Comprehensive Plan may be proposed to any element of the adopted Sumner Comprehensive Plan, including amendments to goals, policies, objectives, or comprehensive plan maps. Application must be complete and contain the information required in the SMC 18.56.147. The application fees are: Comprehensive Plan Amendment--\$2,600; Change in Zoning Map--\$3,000.

The City is also accepting applications for amendments to the Zoning Code (text only, not the Zoning Map). Applications must be complete and contain information required in SMC 18.56.149. No fee will be charged if applied for by the established deadline.

Completed applications must be submitted to the Sumner Community Development Department, 1104 Maple Street, Suite 250, Sumner, WA 98390 by **5:00 p.m., Friday, August 29, 2014.**

Questions may be directed to Ryan Windish, Planning Manager, at the Community Development Department (253) 299-5524 or email ryanw@ci.sumner.wa.us.

CITY OF SUMNER

NOTICE OF REVISED SCOPE

2015 City Comprehensive Plan and East Sumner Subarea Plan Updates

Revised Scope of the Supplemental Environmental Impact Statement (SEIS)

On August 8, 2014, the City of Sumner issued a Determination of Significance and Scoping Notice for the 2015 City Comprehensive Plan and East Sumner Subarea Plan Updates. Following the scoping comment period which extended from August 8 to August 29, 2014, the City considered comments received, public input at community meetings in summer and fall 2014, and input at briefings to the Planning Commission and City Council. The City has updated features of the Proposal, and is considering use of State Environmental Policy Act (SEPA) tools such as a Planned Action or Infill Exemption for East Sumner. However, the overall proposal remains an update to the City's Comprehensive Plan and East Sumner Subarea Plan. As a courtesy, the City is issuing this notice of revised scope with the proposals under consideration.

Description of Updated Proposal

The City of Sumner will be updating its Comprehensive Plan by June 30, 2015 in accordance with the Growth Management Act. As part of the update, the City will be considering a citywide growth horizon to the year 2035, amended policies addressing Growth Management Act, Countywide Planning Policies, and VISION 2040 provisions.

Plan Elements: Key amendments to the Comprehensive Plan's elements that will be considered include but are not limited to:

- Updates to the Sumner Vision Statement;
- Updates to the Capital Facilities Plan per GMA to include new capital improvement projects (CIPs) in functional plans (sewer, water, transportation) and a review of Level of Service standards;
- Completion of a Best Available Science (BAS) review with amendments to Critical Areas Regulations if needed;
- Updates to the Transportation Plan including updating the transportation model as well as goals and policies per GMA; and
- Housekeeping amendments and updates to text and goals/policies/objectives consistent with the City's review of its plans in light of state and regional goals and plans as well as community vision and needs.

Land Use, Zoning, and Development Regulations: Amendments to the Comprehensive Plan land use map, zoning map and development regulations would also be considered, including but not limited to:

- Adjustment to the City's Urban Service Area to match the City's 2010 boundaries consistent with Pierce County Comprehensive Plan;
- Updates to the East Sumner Neighborhood Plan (see further description below);
- Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue;
- Change in designation and zoning of Multi-family designated land to manufacturing (M-1) along the East Valley Highway;
- Amend the Manufacturing/Industrial Center boundary to include the former Sumner Meadows Golf Course;

- Remove PMUD overlay from Fleischmann property and include it in the MIC;
- Remove Design Districts designations;
- Amend any Private Public Utility Facility designations that have been surplus, etc.;
- Retain “Joint Planning Area” as a future southern expansion to keep in policy and the Plan for future reference, and describe in policy what is meant by this area;
- An amendment to the Zoning Code (Title 18) to address the siting of essential public facilities (EPFs) per RCW 36.70A.200;
- An amendment to development regulations to require concurrency per RCW 36.70A.070(6)(b);
- An amendment to the timeframe for extending or encumbering impact fees per RCW 82.02;
- Amendments to Critical Areas Regulations if needed;
- Consider amendments to Town Center building heights and elimination of condominium requirement to promote vision for Town Center; and
- Other miscellaneous clean-up and housecleaning modifications to the land use plan, zoning, and development regulations.

East Sumner Neighborhood Plan: The City will also be updating the East Sumner Neighborhood Plan. The East Sumner Neighborhood Plan Update will result in planning level proposals for road improvements, land use regulations, environmental protection, pedestrian and bicycle paths and other possible City measures. It is anticipated that the actions under consideration would alter the City’s Comprehensive Plan land use plan and land capacity, as well as transportation plan assumptions.

SEPA Tools Under Consideration – East Sumner: The City is considering the use of SEPA tools to promote the vision of mixed use growth in East Sumner, such as a mixed use and residential infill exemption (RCW 43.21C.229), or a planned action (RCW 43.21C.440; WAC 197-11-164 to 172) where development that meets City codes and performance standards would have a streamlined SEPA process and rely on the EIS rather than require a new threshold determination.

Location of Proposal

The proposal encompasses the Sumner city limits and the Sumner Urban Service Area, collectively called the Sumner Planning Area. The East Sumner Subarea Plan will be focused on the East Sumner Neighborhood approximately between Parker Road and Sumner Tapps Highway and from Salmon Creek on the north to SR 410 on the south.

Proponent & Lead Agency

The proponent and lead agency of the proposal is the City of Sumner.

EIS Required

The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. A supplemental environmental impact statement (SEIS) is required under RCW 43.21C.030 (2)(c) and will be prepared. The SEIS will supplement the Final Environmental Impact Statement prepared for the City of Sumner Comprehensive Plan Update and Amendments, November 2010. The SEIS will also consider other recent SEPA documents for Comprehensive Plan amendments.

Elements of the Environment to be Addressed

The lead agency has identified the following areas for discussion in the SEIS: natural environment (including earth, flooding, water quality, and plants and animals); air quality and greenhouse gas (GHG); land use; population, employment and housing; relationship to plans and policies; transportation; and public services, capital facilities and utilities.

Conceptual Alternatives

A comparative evaluation of alternative courses of action for the City as a whole (including a no-action alternative) will be considered. A series of alternative land use concepts for the East Sumner Neighborhood will be considered within the citywide alternatives as well.

For More Information

For more information, please see the City's project website at: <http://ci.sumner.wa.us/comprehensive-plan-update/>.

Or contact: Ryan Windish, Sumner Community Development Department, 1104 Maple Street, Suite 250, Sumner, WA 98390.

Responsible Official

Designated SEPA Responsible Official

Paul Rogerson, Community Development Director
City of Sumner
1104 Maple Street
Sumner, WA 98390-1423

Phone: 253-299-5521
Fax: 253-299-5509
E-mail: paulr@ci.sumner.wa.us

Signature:  _____

Date 12/2/14

East Sumner Neighborhood Plan

The City first adopted a plan for East Sumner in 2001 and needs to update this plan to accommodate changes in the neighborhood that include a new YMCA under construction and greater knowledge of wetlands in the area. As part of this update, the city is considering a change to zoning, road layouts, and other elements of the East Sumner Neighborhood Plan.

The City has had three public meetings for the East Sumner Neighborhood Plan:

Workshop 1 – June 30, 2014: This meeting introduced the process and set the major drivers behind the East Sumner plan update. Participants gave general comments to the staff and consultants, who recorded those ideas and then met in small groups to discuss details of routing roads, wetlands, and land uses.

[Mtg 1 Goals and objectives \(pdf\)](#)

[Mtg 1 Community Suggestions Map \(pdf\)](#)

Workshop 2 . August 19, 2014: This meeting reviewed and discussed three concepts that were a product of the last meeting's ideas. This meeting was advertised as a scoping meeting for the Draft Supplemental Environmental Impact Statement.

[East Sumner Neighborhood Draft Concept Map \(pdf\)](#)

Workshop 3 – October 14, 2014: From the three general concepts presented at the second meeting to outline what could happen, this meeting focused on how it could happen and, most importantly, be funded. The final plan must coincide with short- and long-term trends in the marketplace.

East Sumner Neighborhood Plan Update

Draft Goals and Objectives (8-04-2014)

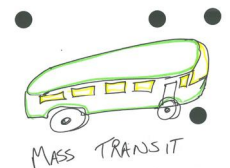
Compiled from direct community feedback following Workshop #1, these goals and objectives have been assembled to help guide future iterations of the neighborhood plan update. They will help to ensure decisions made are directly reflective of community character and values. This particular list will continue to be modified as this effort progresses, more community input is received, and concepts are further refined.

Site Mobility and Safety

- Incorporate a multi-modal transportation strategy
- Enhance automobile circulation within and through the neighborhood
- Provide a robust pedestrian and bicycle network
- Reduce impacts of vehicle traffic

Objectives

- Provide a number of routes through the neighborhood to diffuse traffic congestion
- Use traffic calming techniques such as traffic circles and narrower lanes
- Increase number of through routes
- Provide for local and regional bus service on-site
- Integrate a connective network of sidewalks and pathways throughout the neighborhood
- Design for shared roads with generous bicycle lanes
- Reduce local truck traffic through the neighborhood

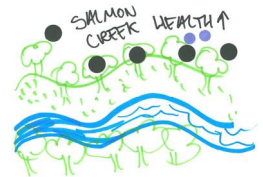


Ecological Viability

- Preserve wetland presence
- Restore Salmon Creek
- Improve environmental health within the neighborhood

Objectives

- Use wetland preservation as a storm water mitigation feature and organizational element
- Create public open space with incorporated wetlands and creek
- Design for new roadways to circumnavigate wetlands
- Emphasize on-site and in-kind wetland impact mitigation where feasible
- Increase tree canopy
- Enforce code on highly neglected sites

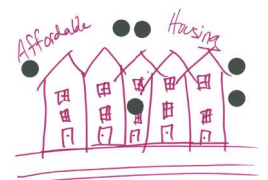


Economic growth

- Provide a mixture of development types
- Respect the context and character of the area
- Adapt neighborhood for major population increases

Objectives

- Create mixed use center with increased density
- Incorporate affordable housing into neighborhood
- Redevelop QFC center
- Retain single family neighborhoods
- Design for commercial corridor opportunities along arterial roads
- Incorporate YMCA as growth catalyst



Community Livability

- Provide a number of opportunities to strengthen community bonds
- Increase opportunities for community interaction
- Create a community-based destination for all Sumner residents

Objectives

- Preserve agricultural heritage by investing in working ag. land, community gardens, and a farmer's market
- Create public parks, educational nature trails, and a dog park



- Make investments in solar projects and new technologies
- Provide a the public library in the neighborhood
- Provide day care, schools, and youth programs in neighborhood
- Enforce code on highly neglected sites
- Capitalize on YMCA success with complimentary community programs
- Leverage YMCA to build community activities



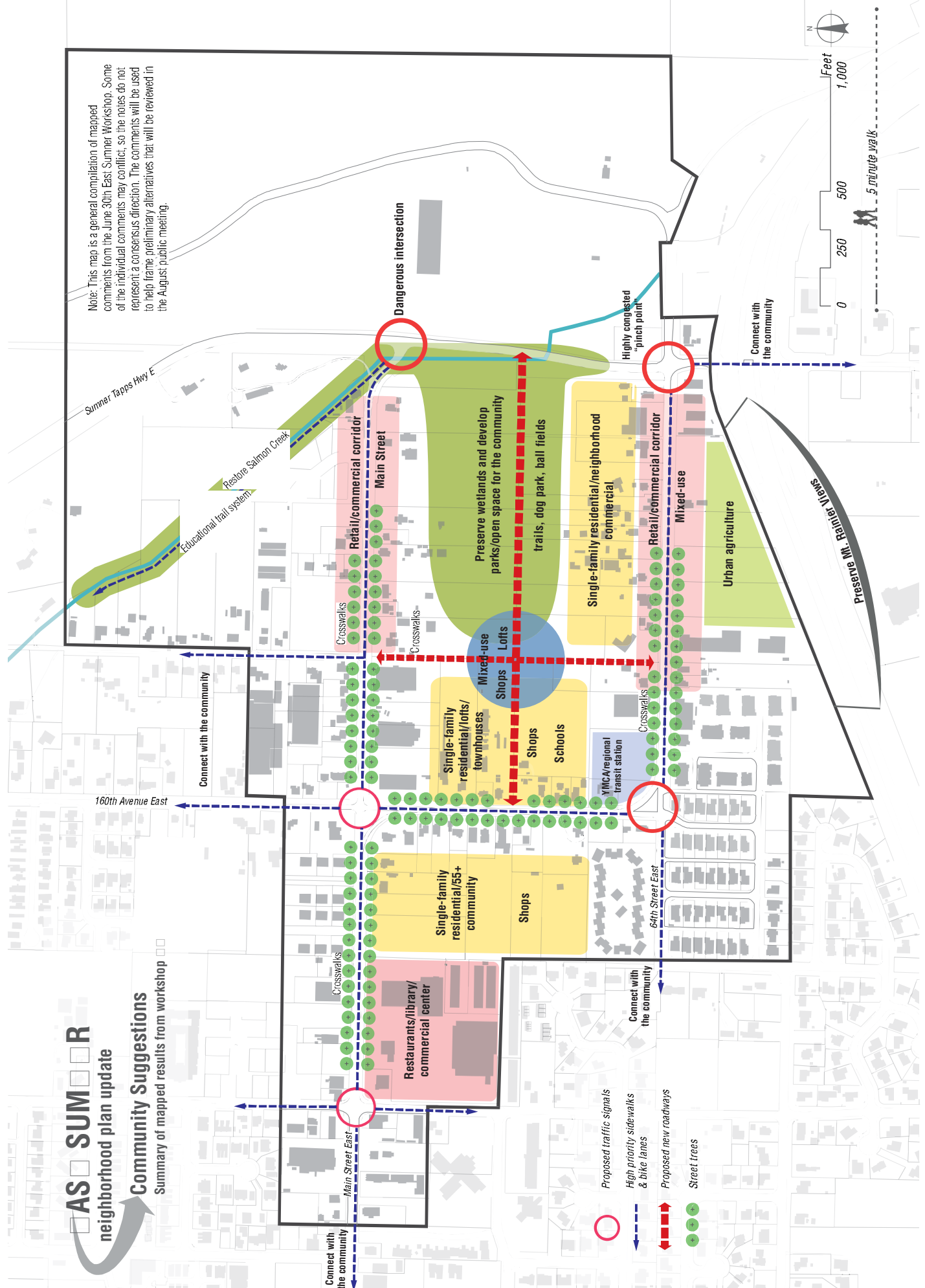
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neighborhood plan update

Community Suggestions

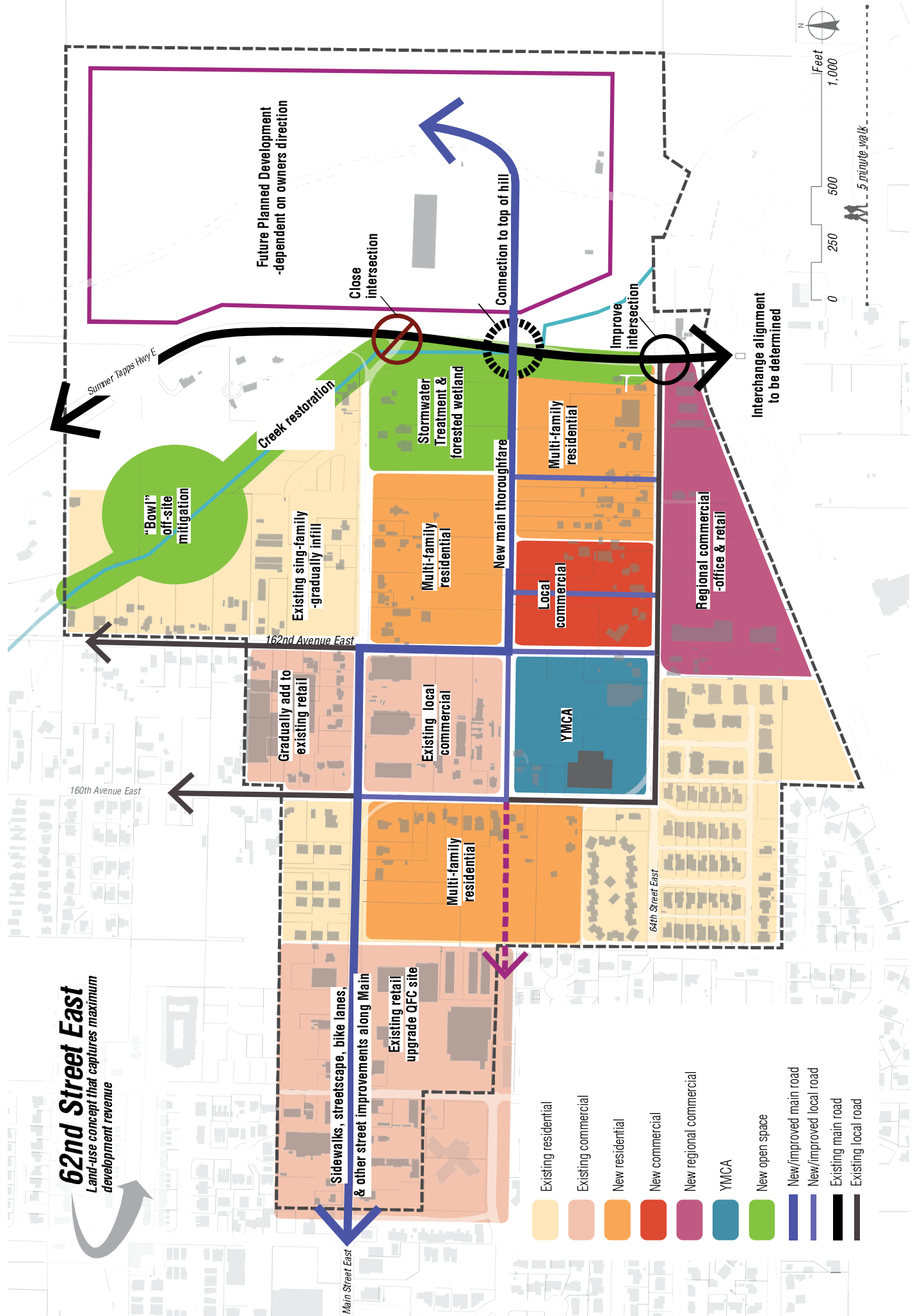
Summary of mapped results from workshop

Note: This map is a general compilation of mapped comments from the June 30th East Summer Workshop. Some of the individual comments may conflict, so the notes do not represent a consensus direction. The comments will be used to help frame preliminary alternatives that will be reviewed in the August public meeting.



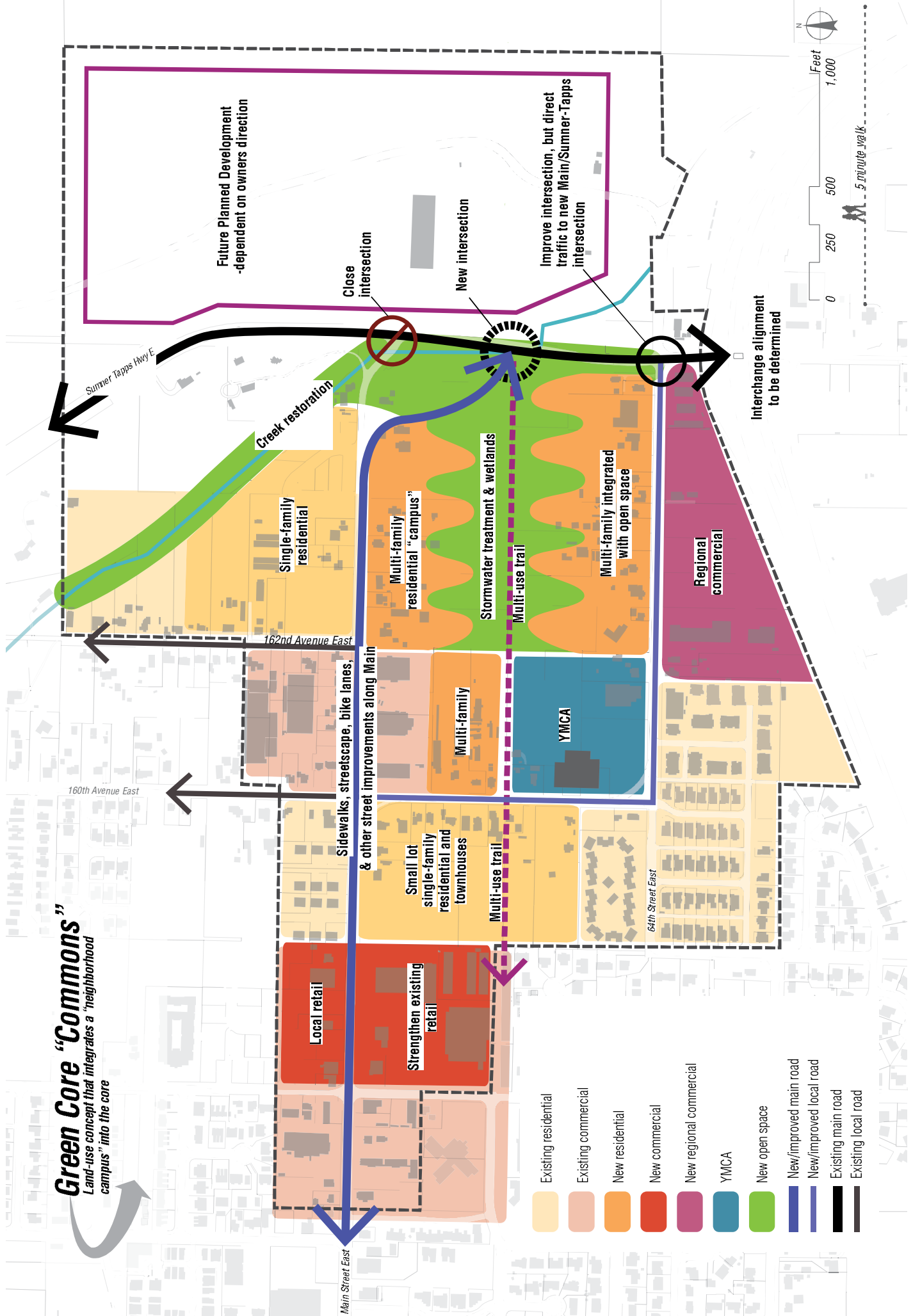
62nd Street East

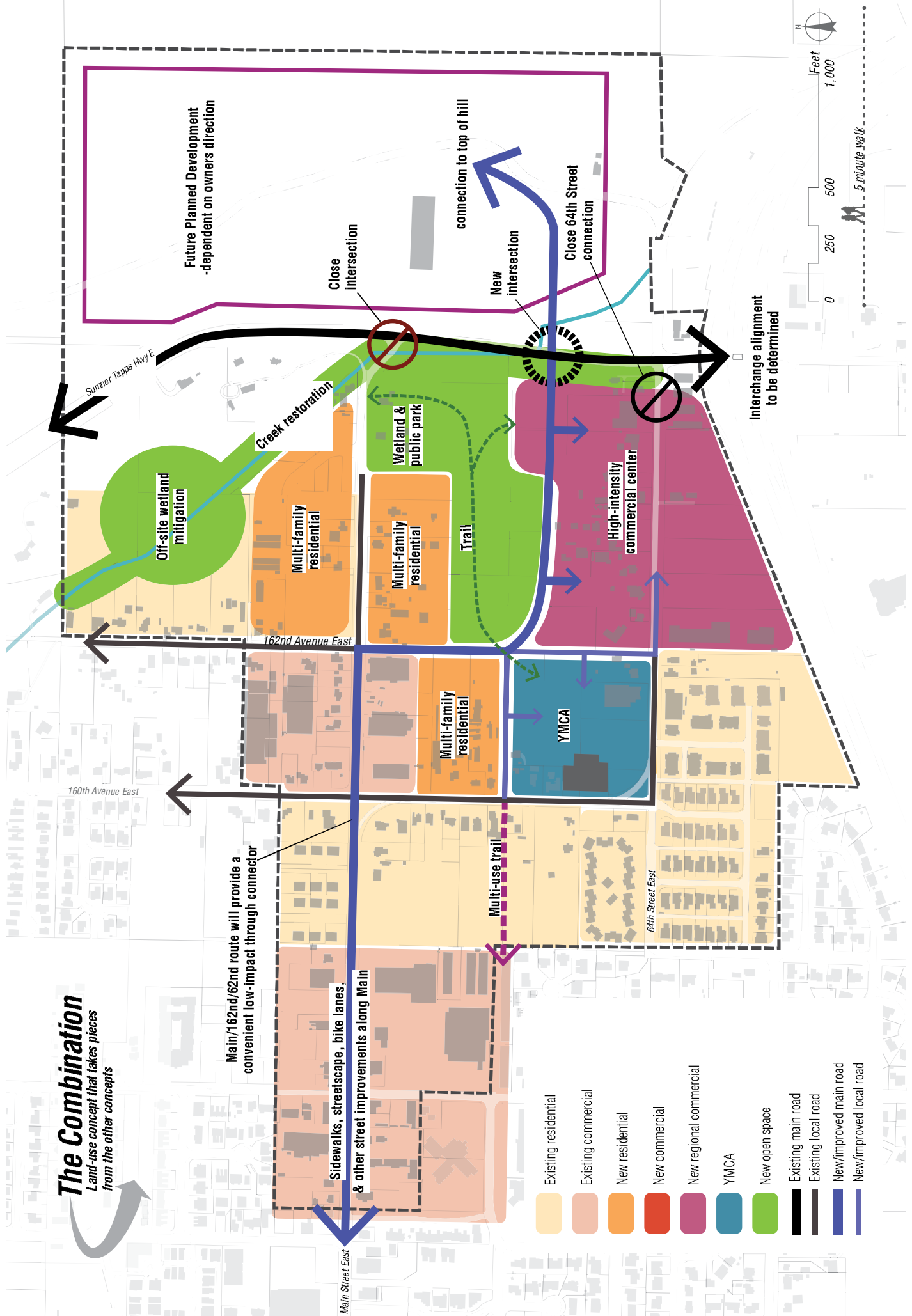
Land-use concept that captures maximum development revenue



Green Core "Commons"

Land-use concept that integrates a "neighborhood campus" into the core





APPENDIX B

Growth Targets and Capacity Analysis

TARGETS AND CAPACITY ANALYSIS 2015

GROWTH TARGETS FROM COUNTYWIDE PLANNING POLICIES

In accordance with the Growth Management Act (GMA), Sumner is required to plan for growth in the following 20-year planning period. The City's growth targets are the result of a multi-jurisdictional, regional process of how each city is able to accommodate its fair share of future regional growth. State Office of Financial Management (OFM) population projections for Pierce County are divided among all Pierce County jurisdictions through an interactive process resulting in adoption of population, housing unit, and employment targets for the succeeding 20 years. The *Pierce County Buildable Lands Report* is completed every 5 years and evaluates whether cities are obtaining urban densities as planned and if there is enough capacity for projected growth. Exhibit 2 below identifies the growth targets for population, housing, and employment for the years 2030 and 2035.

LAND CAPACITY ESTIMATE

Land use capacity is the measure that is used to determine the ability of the City to accommodate its adopted growth targets. The capacity analysis is the City's best guess of what parcels are likely to develop and the nature and intensity of development at the time the analysis is completed. This is similar to a countywide capacity analysis of vacant, underdeveloped (land not developed to full potential), and redevelopable (properties where the land value exceeds the improvement value) lands in the City and Urban Growth Area (UGA). Consistent with regionally established methods that are tailored to reflect Sumner conditions, the total developable acres were discounted for critical areas such as wetlands, streams, and steep slopes, right-of-ways and public purpose lands, and market/availability factors (e.g. not all property owners would want to sell or develop).

The specific detailed steps used for analyzing growth capacity are identified in the *Pierce County Buildable Lands Report*. The base year for the buildable lands report is 2010 and the target year is 2030. The planning period for the Sumner Comprehensive Plan is from 2015 to 2035. For the 2035 targets, figures from the Puget Sound Regional Council (PSRC) *Land Use Targets Workbook* were used, which closely match annual growth rates from the Buildable Lands Report. The City also obtained the GIS Shapefiles and spreadsheet data from Pierce County along with the PSRC Land Use Targets Workbook data for further refinement based on local conditions. See Exhibit 1 for local capacity adjustments.

Exhibit 1. Comparison of Housing Capacity and Housing Growth Targets

Zoning District	Housing Capacity:		Revised Capacity: 2015	Sumner 2010 Land Capacity
	Pierce County BLR 2014	Local Adjustments		
LDR4	106		106	60
LDR6	143		143	90
LDR7.2	114		114	85
LDR8.5	394		394	264
LDR12	314	-109	205	159
MDR	344		344	106
HDR	199	-164	35	18
AG	4	-4	0	0
MUD	200		200	304
CBD	59		59	77
GC	122	-40	82	118
NC	30		30	27
Total	2029	-317	1712	1308
<i>Pierce County Growth Targets</i>				
2030				5743
2010				4279
Net Growth 2010-2030				1464
<i>Planning Estimates 2035</i>				
2035				6093
2010				4279
Net Growth 2010-2035				1814

Source: Pierce County Buildable Lands, 2014; BERK Consulting 2015

The local adjustments to housing capacity include:

- Remove development potential at the Six Kilns property due to the rezoning to M-1 for light industrial development.
- Remove the Cascade Water Alliance Parcel that is in public ownership and not likely to develop.
- Remove development potential on agriculturally zoned property due to development constraints.

LAND USE ALTERNATIVES

Following are key parameters assumed in the land use and growth estimates for each alternative.

Alternative 1

- Future Land Use consistent with 2010 No Action Future Land Use in the City Limits and Urban Growth Area

Alternative 2

- Alternative 1 plus the following land use changes:

- East Sumner Neighborhood Plan: Minimal Action (Rezoning) Alternative;
- Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue;
- Retain manufacturing (M-1) along the East Valley Highway; and
- Increase buildable land units in Town Center by 25% (net increase of 58 units above No Action) due to the elimination of the condominium requirement for multi-family development around the train station to promote development or the reduction of off-street parking requirements for residential development in the Town Center.

Alternative 3

- Alternative 1 plus the following land use changes:
 - East Sumner Neighborhood Plan: Assertive Collaborative Action;
 - Change in designation and zoning of approximately 0.4 acres from Neighborhood Commercial to Light Manufacturing (M-1) located at 1418 Wood Avenue;
 - Change in designation and zoning of Multi-family designated land to manufacturing (M-1) along the East Valley Highway; and
 - Increase buildable land units in Town Center by 50% (net increase of 115 units above No Action) due to the elimination of the condominium requirement for multi-family around the train station and the reduction of off-street parking requirements in the Town Center to promote development.

Other Assumption on Job Mix

- Alternative 1 assumes a job mix consistent with sector breakdowns in the Manufacturing Industrial Center Study (2009) including 38% for Construction/Resource jobs, which is significantly higher than the assumptions for Alternatives 2 and 3.
- Alternatives 2 and 3 assume a job mix based on PSRC Land Use Targets Workbook, with a Construction/Resource share at about 14%.

ALTERNATIVES AND GROWTH CAPACITY

Exhibit 2 below shows the 2010 population, housing and employment, 2030 and 2035 growth based on Pierce County Buildable Lands and PSRC's Land Use Targets Workbook, plus the land capacity of each alternative in comparison to the 2035 targets.

Exhibit 2. Growth Targets and Capacity within the City Limits by Alternative

	2010	2030	2035	Net 2030	Net 2035	Alternative 1	Diff Alt 1 2010-35	Alternative 2	Diff Alt 2 2010-35	Alternative 3	Diff Alt 3 2010-2035
Population	9,451	11,970	12,570	2,519	3,119	3,733	614	4,096	977	4,159	1,040
Housing	4,279	5,743	6,093	1,464	1,814	1,709	(105)	1,876	62	1,904	90
Employment	9,316	19,599	21,762	10,283	12,446	12,593	147	12,593	147	12,946	500

Source: BERK Consulting, 2014

Growth capacity in the UGA outside the city limits was also analyzed to determine capacity and ability to meet growth targets. Growth capacity and targets within the UGA are assumed to be the same under all of the alternatives. In addition, the Urban Growth Area estimates applied in Sumner's work to date assume the buildable capacity (See Exhibit 3 "2035 BLR" for target and capacity). The population, housing, and employment figures for existing conditions, targets and capacity within the UGA are as follows:

- Alternative 1 can meet 2035 population and employment targets, but not housing targets
- Alternative 2 can meet population, housing, and employment targets
- Alternative 3 can meet population, housing, and employment targets

The County has provided BERK Consulting the GIS information from the Buildable Lands Report for the Sumner UGA. The County has allocated draft targets for the UGA for the year 2035 (*Pierce County 2030 Housing and Employment Target Allocation, December 10, 2014*). For a conservative analysis to the year 2035, the UGA estimates consider the buildable land capacity estimated by Pierce County. There are no substantive changes planned in Sumner's UGA, and its assumed growth would be the same under all alternatives.

Exhibit 3. Growth Targets and Capacity within the UGA

	2010	2030 Total: Target Allocation	2035 Buildable Land Capacity	Net 2030	Net 2035
Population	1,112	2,020	3,394	908	2,282
Housing	509	925	1,554	416	1,045
Employment	68	144	346	76	278

Source: BERK Consulting, 2014

APPENDIX C

Planned Action Ordinance

ORDINANCE NO XX

AN ORDINANCE OF THE CITY OF SUMNER, WASHINGTON,
ESTABLISHING A PLANNED ACTION FOR THE EAST SUMNER
NEIGHBORHOOD PURSUANT TO THE STATE
ENVIRONMENTAL POLICY ACT.

WHEREAS, the State Environmental Policy Act (SEPA) and its implementing regulations provide for the integration of environmental review with land use planning and project review through the designation of planned actions by jurisdictions planning under the Growth Management Act (GMA), such as the City of Sumner (“City”); and

WHEREAS, Section 43.21C.440 of the Revised Code of Washington (RCW), Sections 197-11-164 through 172 of the Washington Administrative Code (WAC), and Section 17.13.030 of the Sumner Municipal Code (SMC) allow for and govern the adoption and application of a planned action designation under SEPA; and

WHEREAS, the State Department of Commerce (DOC) has studied planned actions in various communities throughout the state and found that predefined mitigation as allowed under a planned action ordinance has resulted in increased certainty and predictability for development, time and cost savings for development project proponents and cities, and increased revenues for cities when used with other economic development tools; and

WHEREAS, the designation of a planned action expedites the permitting process for projects of which the impacts have been previously addressed in an supplemental environmental impact statement (SEIS); and

WHEREAS, a subarea of the City commonly referred to as the “East Sumner Neighborhood”, as depicted on the map attached hereto as Exhibit A and incorporated herein by this reference, has been identified as a planned action area for future development (“Planned Action Area”); and

WHEREAS, the City has developed and adopted a Comprehensive Plan update in June XX, 2015 and a subarea plan titled the East Sumner Neighborhood Plan adopted XXX through Ordinance No. XX and updated XX through Ordinance No. XX complying with the GMA (RCW 36.70A) to guide the development of the East Sumner Neighborhood Planned Action Area; and

WHEREAS, after extensive public participation and coordination with all affected parties, the City, as lead SEPA agency, issued the Sumner Comprehensive Plan, East Sumner Neighborhood Plan, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action Final Supplemental Environmental Impact Statement (“FSEIS”) dated XX, 2015, which identifies the impacts and mitigation measures associated with planned development in the Planned Action Area as identified in the Comprehensive Plan; the FSEIS includes by incorporation the associated Draft Supplemental Environmental Impact Statement issued on XX, 2015 (collectively referred to herein as the “Planned Action SEIS”); and

WHEREAS, the City desires to designate a planned action under SEPA for the East Sumner Neighborhood (“Planned Action”); and

WHEREAS, adopting a Planned Action for the East Sumner Neighborhood with appropriate standards and procedures will help achieve efficient permit processing and promote environmental quality protection; and

WHEREAS, the City has adopted development regulations and ordinances that will help protect the environment and will adopt regulations to guide the allocation, form, and quality of development in the East Sumner Neighborhood; and

WHEREAS, the City Council finds that adopting this Ordinance is in the public interest and will advance the public health, safety, and welfare;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON DOES HEREBY ORDAIN AS FOLLOWS:

Section I. Purpose. The purpose of this Ordinance is to:

- A.** Combine environmental analysis, land use plans, development regulations, and City codes and ordinances together with the mitigation measures in the Planned Action SEIS to mitigate environmental impacts and process Planned Action development applications in the Planned Action Area;
- B.** Designate the East Sumner Neighborhood shown in Exhibit A as a Planned Action Area for purposes of environmental review and permitting of designated Planned Action Projects pursuant RCW 43.21C.440;
- C.** Determine that the Planned Action SEIS meets the requirements of a planned action SEIS pursuant to SEPA;
- D.** Establish criteria and procedures for the designation of certain projects within the Planned Action Area as “Planned Action Projects” consistent with RCW 43.21C.440;
- E.** Provide clear definition as to what constitutes a Planned Action Project within the Planned Action Area, the criteria for Planned Action Project approval, and how development project applications that qualify as Planned Action Projects will be processed by the City;
- F.** Streamline and expedite the land use permit review process by relying on the Planned Action SEIS; and
- G.** Apply applicable regulations within the City’s development regulations and the mitigation framework contained in this Ordinance for the processing of Planned Action Project applications and to incorporate the applicable mitigation measures into the underlying project permit conditions in order to address the impacts of future development contemplated by this Ordinance.

Section II. Findings. The City Council finds as follows:

- A.** The Recitals above are adopted herein as Findings of the City Council.
- B.** The City is subject to the requirements of the GMA.
- C.** The City has adopted a Comprehensive Plan complying with the GMA which incorporates text and policies specific to the East Sumner Neighborhood.
- D.** The City is adopting zoning and development regulations concurrent with the Comprehensive Plan to implement said Plan, including this Ordinance.
- E.** The Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS adequately identifies and addresses the probable significant environmental impacts associated with the type and amount of development planned to occur in the designated Planned Action Area.
- F.** The mitigation measures identified in the Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS, attached to this Ordinance as Exhibit B and incorporated herein by reference, together with adopted City development regulations are adequate to mitigate significant adverse impacts from development within the Planned Action Area.
- G.** The Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS identifies the location, type, and amount of development that is contemplated by the Planned Action.
- H.** Future projects that are implemented consistent with the Planned Action will protect the environment, benefit the public, and enhance economic development.

I. The City provided several opportunities for meaningful public involvement and review in the Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS process, including a community meeting consistent with RCW 43.21C.440; has considered all comments received; and, as appropriate, has modified the proposal or mitigation measures in response to comments.

J. Essential public facilities as defined in RCW 36.70A.200 are excluded from the Planned Action as designated herein and are not eligible for review or permitting as Planned Action Projects unless they are accessory to or part of a project that otherwise qualifies as a Planned Action Project.

K. The designated Planned Action Area is located entirely within a UGA.

L. Implementation of the mitigation measures identified in the Planned Action SEIS will provide for adequate public services and facilities to serve the proposed Planned Action Area.

Section III. Procedures and Criteria for Evaluating and Determining Planned Action Projects within the Planned Action Area.

A. Planned Action Area. This “Planned Action” designation shall apply to the area shown in Exhibit A of this Ordinance.

B. Environmental Document. A Planned Action Project determination for a site-specific project application within the Planned Action Area shall be based on the environmental analysis contained in the Sumner Comprehensive Plan and Municipal Code Update SEIS. The mitigation measures contained in Exhibit B of this Ordinance are based upon the findings of the Sumner Comprehensive Plan and Municipal Code Update SEIS and shall, along with adopted City regulations, provide the framework the City will use to apply appropriate conditions on qualifying Planned Action Projects within the Planned Action Area.

C. Planned Action Project Designated. Land uses and activities described in the Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS, subject to the thresholds described in Subsection III.D of this Ordinance and the mitigation measures contained in Exhibit B of this Ordinance, are designated “Planned Action Projects” pursuant to RCW 43.21C.440. A development application for a site-specific project located within the Planned Action Area shall be designated a Planned Action Project if it meets the criteria set forth in Subsection III.D of this Ordinance and all other applicable laws, codes, development regulations, and standards of the City, including this Ordinance, are met.

D. Planned Action Qualifications. The following thresholds shall be used to determine if a site-specific development proposed within the Planned Action Area was contemplated as a Planned Action Project and has had its environmental impacts evaluated in the Planned Action SEIS:

(1) Qualifying Land Uses.

(a) A primary land use can qualify as a Planned Action Project land use when:

- i. it is within the Planned Action Area as shown in Exhibit A of this Ordinance;
- ii. it is consistent with land use categories and activities studied in the Draft SEIS and consistent with zoning classifications applied to properties within the Planned Action Area.

A Planned Action Project may be a single Planned Action land use or a combination of Planned Action land uses together in a mixed-use development. Planned Action land uses may include accessory uses.

(b) Public Services: The following public services, infrastructure, and utilities can also qualify as Planned Actions: onsite roads, utilities, parks, trails, and similar facilities developed consistent with the Planned Action SEIS mitigation measures, City and special district design standards, critical area regulations,

and the Sumner Municipal Code. Projects that involve wetland mitigation and are consistent with the impacts and mitigation addressed in the Final SEIS also qualify as Planned Action Projects.

(2) Development Thresholds:

- (a) Land Use: The following thresholds of new land uses are contemplated by the Planned Action:

Feature	Alternative 3 – Assertive Collaborative Action
New Housing Units	500
New Employment (Jobs)	581

- (b) Shifting development amounts between land uses in identified in Subsection III.D(2)(a) may be permitted when the total build-out is less than the aggregate amount of development reviewed in the Sumner Comprehensive Plan and Municipal Code Update SEIS; the traffic trips for the preferred alternative are not exceeded; and, the development impacts identified in the Sumner Comprehensive Plan and Municipal Code Update SEIS are mitigated consistent with Exhibit B of this Ordinance.
- (c) Further environmental review may be required pursuant to WAC 197-11-172, if any individual Planned Action Project or combination of Planned Action Projects exceeds the development thresholds specified in this Ordinance and/or alter the assumptions and analysis in the Sumner Comprehensive Plan and Municipal Code Update SEIS.

(3) Transportation Thresholds:

- (a) Trip Ranges & Thresholds. The number of new PM peak hour trips anticipated in the Planned Action Area and reviewed in the Planned Action SEIS for 2035 is as follows:

PM PEAK HOUR TRIPS	
Alternative 3 – Assertive Collaborative Action	
Net Increase in PM Peak Hour Trips	
Alternative –3 East Sumner	1,746
Source: Transpo 2015	

- (b) Concurrency. All Planned Action Projects shall meet the transportation concurrency requirements and the Level of Service (LOS) thresholds established in the Sumner Transportation Plan and implementing code, as appropriate.
- (c) Transportation Impact Mitigation. Transportation impact fees shall be paid consistent with Chapter 12.36 SMC. Transportation mitigation shall also be provided consistent with mitigation measures in Exhibit B, Attachment B-1 of this Ordinance attached hereto and incorporated by this reference.
- (d) The responsible City official shall require documentation by Planned Action Project applicants demonstrating that the total trips identified in Subsection III.D(3)(a) are not exceeded, that the project meets the concurrency standards of Subsection III.D(3)(b), and that the project has mitigated impacts consistent with Subsection III.D (3)(c).
- (e) Discretion.
- i. The responsible City official shall have discretion to determine incremental and total trip generation, consistent with the Institute of Traffic Engineers (ITE) Trip Generation Manual (latest edition) or an alternative manual accepted by the City's Public Works Director at his or her sole discretion, for each project permit application proposed under this Planned Action.

- ii. The responsible City official shall have discretion to condition Planned Action Project applications to meet the provisions of this Planned Action Ordinance and the Sumner Municipal Code.
 - iii. The responsible City official shall have the discretion to adjust the allocation of responsibility for required improvements between individual Planned Action Projects based upon their identified impacts.
- (4) Elements of the Environment and Degree of Impacts. A proposed project that would result in a significant change in the type or degree of adverse impacts to any element(s) of the environment analyzed in the Sumner Comprehensive Plan, East Sumner Neighborhood Plan Update, and Municipal Code Update SEIS would not qualify as a Planned Action Project.
- (5) Changed Conditions. Should environmental conditions change significantly from those analyzed in the Planned Action SEIS, the City's SEPA Responsible Official may determine that the Planned Action Project designation is no longer applicable until supplemental environmental review is conducted.

E. Planned Action Project Review Criteria.

- (1) The City's SEPA Responsible Official, or authorized representative, may designate as a Planned Action Project, pursuant to RCW 43.21C.440, a project application that meets all of the following conditions:
- (a) the project is located within the Planned Action Area identified in Exhibit A of this Ordinance;
 - (b) the proposed uses and activities are consistent with those described in the Sumner Comprehensive Plan, East Sumner Neighborhood Plan Update, and Municipal Code Update SEIS and Subsection III.D of this Ordinance;
 - (c) the project is within the Planned Action thresholds and other criteria of Subsection III.D of this Ordinance;
 - (d) the project is consistent with the Sumner Comprehensive Plan including the regulations of the East Sumner Neighborhood integrated into the Sumner Municipal Code;
 - (e) the project's significant adverse environmental impacts have been identified in the Sumner Comprehensive Plan, East Sumner Neighborhood Plan Update, and Municipal Code Update SEIS;
 - (f) the project's significant impacts have been mitigated by application of the measures identified in Exhibit B of this Ordinance and other applicable City regulations, together with any conditions, modifications, variances, or special permits that may be required;
 - (g) the project complies with all applicable local, state and/or federal laws and regulations and the SEPA Responsible Official determines that these constitute adequate mitigation; and
 - (h) the project is not an essential public facility as defined by RCW 36.70A.200, unless the essential public facility is accessory to or part of a development that is designated as a Planned Action Project under this Ordinance.
- (2) The City shall base its decision to qualify a project as a Planned Action Project on review of the Subarea SEPA Checklist form included in Exhibit B to this Ordinance and review of the Planned Action Project submittal and supporting documentation, provided on City required forms.

F. Effect of Planned Action Designation.

- (1) Designation as a Planned Action Project by the City's SEPA Responsible Official means that a qualifying project application has been reviewed in accordance with this Ordinance and found to be consistent with the development parameters and thresholds established herein and with the environmental analysis contained in the Planned Action SEIS.

- (2) Upon determination by the City’s SEPA Responsible Official that the project application meets the criteria of Subsection III.D and qualifies as a Planned Action Project, the project shall not require a SEPA threshold determination, preparation of an SEIS, or be subject to further review pursuant to SEPA. Planned Action Projects will still be subject to all other applicable City, state, and federal regulatory requirements. The Planned Action Project designation shall not excuse a project from meeting the City’s code and ordinance requirements apart from the SEPA process.

G. Planned Action Project Permit Process. Applications submitted for qualification as a Planned Action Project shall be reviewed pursuant to the following process:

- (1) Development applications shall meet all applicable requirements of the Sumner Municipal Code and this Ordinance in place at the time of the Planned Action Project application. Planned Action Projects shall not vest to regulations required to protect public health and safety.
- (2) Applications for Planned Action Projects shall:
 - (a) be made on forms provided by the City;
 - (b) include the Subarea SEPA checklist included in Exhibit B of this Ordinance; and
 - (c) meet all applicable requirements of the Sumner Municipal Code and this Ordinance.
- (3) The City’s SEPA Responsible Official shall determine whether the application is complete and shall review the application to determine if it is consistent with and meets all of the criteria for qualification as a Planned Action Project as set forth in this Ordinance.
- (4)
 - (a) If the City’s SEPA Responsible Official determines that a proposed project qualifies as a Planned Action Project, he/she shall issue a “Determination of Consistency” and shall mail or otherwise verifiably deliver said Determination to the applicant; the owner of the property as listed on the application; and federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project, pursuant to RCW 43.21C.440.
 - (b) Upon issuance of the Determination of Consistency, the review of the underlying project permit(s) shall proceed in accordance with the applicable permit review procedures specified in Title 18 SMC, except that no SEPA threshold determination, SEIS, or additional SEPA review shall be required.
 - (c) The Determination of Consistency shall remain valid and in effect as long as the underlying project application approval is also in effect.
 - (d) Public notice and review for qualified Planned Action Projects shall be tied to the underlying project permit(s). If notice is otherwise required for the underlying permit(s), the notice shall state that the project qualifies as a Planned Action Project. If notice is not otherwise required for the underlying project permit(s), no special notice is required by this Ordinance.
- (6)
 - (a) If the City’s SEPA Responsible Official determines that a proposed project does not qualify as a Planned Action Project, he/she shall issue a “Determination of Inconsistency” and shall mail or otherwise verifiably deliver said Determination to the applicant; the owner of the property as listed on the application; and federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project, pursuant to Chapter 1, Laws of 2012 (Engrossed Substitute Senate Bill (ESSB) 6406).
 - (b) The Determination of Inconsistency shall describe the elements of the Planned Action Project application that result in failure to qualify as a Planned Action Project.
 - (c) Upon issuance of the Determination of Inconsistency, the City’s SEPA Responsible Official shall prescribe a SEPA review procedure for the non-qualifying project that is consistent with the City’s SEPA regulations and the requirements of state law.

- (d) A project that fails to qualify as a Planned Action Project may incorporate or otherwise use relevant elements of the Planned Action SEIS, as well as other relevant SEPA documents, to meet the non-qualifying project's SEPA requirements. The City's SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action SEIS.
- (7) To provide additional certainty about applicable requirements, the City or applicant may request consideration and execution of a development agreement for a Planned Action Project, consistent with RCW 36.70B.170 et seq.
- (8) A Determination of Consistency or Inconsistency is a Type II land use decision and may be appealed pursuant to the procedures established in Title 18 SMC. An appeal of a Determination of Consistency shall be consolidated with any pre-decision or appeal hearing on the underlying project application.

Section IV. Monitoring and Review.

A. The City should monitor the progress of development in the designated Planned Action area as deemed appropriate to ensure that it is consistent with the assumptions of this Ordinance and the Sumner Comprehensive Plan and Municipal Code Update SEIS regarding the type and amount of development and associated impacts and with the mitigation measures and improvements planned for the Planned Action Area.

B. This Planned Action Ordinance shall be reviewed by the SEPA Responsible Official no later than five (5) years from its effective date in conjunction with the City's regular Comprehensive Plan review cycle, as applicable. The timing of subsequent reviews after the first review shall be determined with the completion of the first review. The review shall determine the continuing relevance of the Planned Action assumptions and findings with respect to environmental conditions in the Planned Action Area, the impacts of development, and required mitigation measures (Exhibit B) and Public Agency Actions and Commitments (Exhibit C). Based upon this review, the City may propose amendments to this Ordinance or may supplement or revise the Sumner Comprehensive Plan and Municipal Code Update SEIS.

Section V. Conflict. In the event of a conflict between this Ordinance or any mitigation measures imposed thereto, and any ordinance or regulation of the City, the provisions of this Ordinance shall control.

Section VI. Severability. If any one or more sections, subsections, or sentences of this Ordinance are held to be unconstitutional or invalid such decision shall not affect the validity of the remaining portions of this Ordinance and the same shall remain in full force and effect.

Section VII. Effective Date. This Ordinance shall take effect and be in force ten (10) days after publication as provided by law.

Passed by the City Council of the City of Sumner the **XXth day of XXX**, 2015.

Mayor David L. Enslow

ATTESTED:

PUBLISHED: **XXX**, 2015

EFFECTIVE: **XXX**, 2015

City Clerk Terri Berry, MMC

First Reading:

Second Reading:

Date Adopted:

Date of Publication:

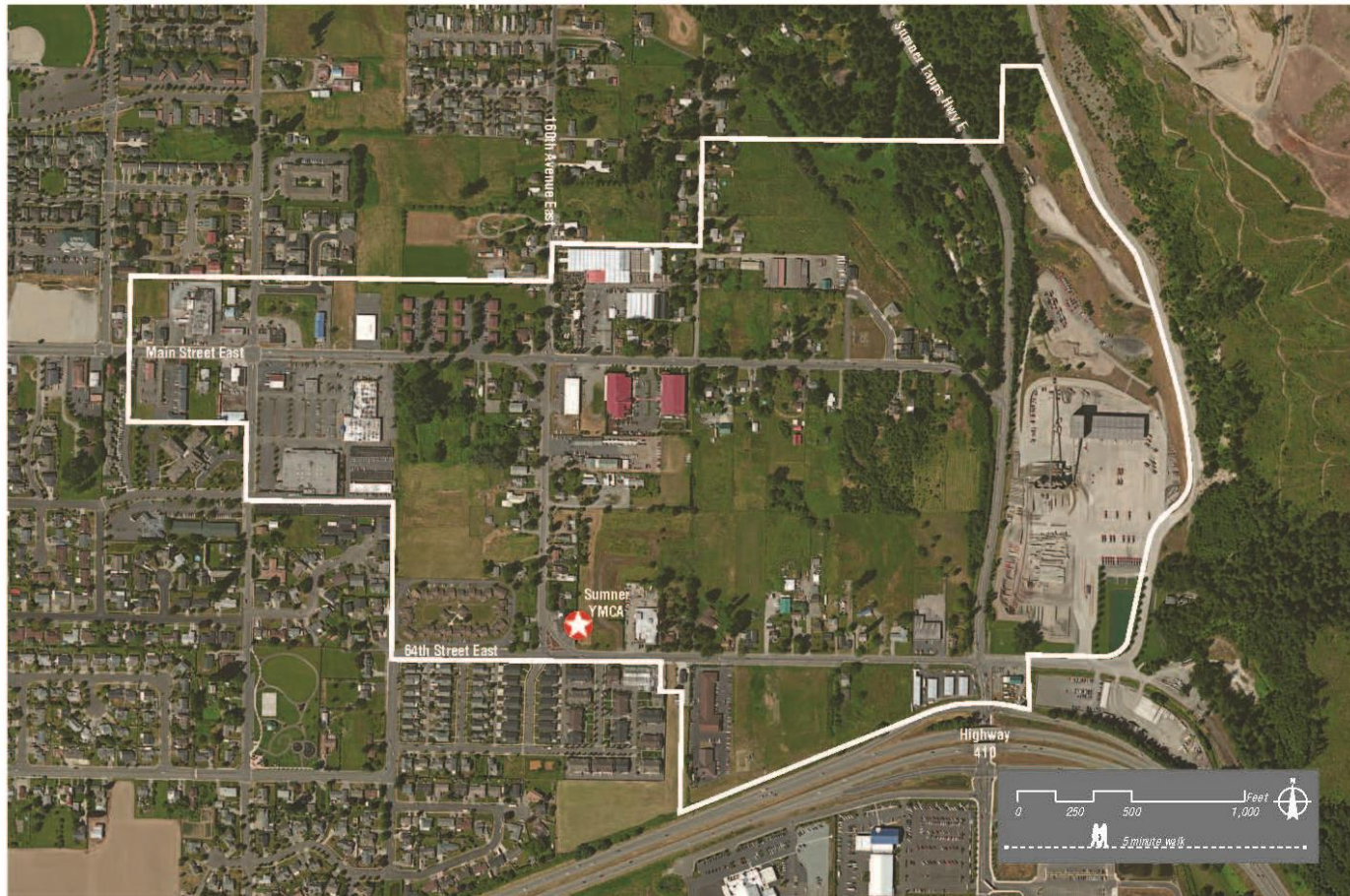
Effective Date:

APPROVED AS TO FORM:

Brett Vinson, City Attorney

Draft

EXHIBIT A SUMNER EAST SUMNER NEIGHBORHOOD PLANNED ACTION AREA



The East Sumner Neighborhood Subarea.



EXHIBIT B MITIGATION MEASURES

INTRODUCTION

The State Environmental Policy Act (SEPA) requires environmental review for project and non-project proposals that are likely to have adverse impacts upon the environment. In order to meet SEPA requirements, the City of Sumner issued the Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS, as defined in this East Sumner Neighborhood Planned Action Ordinance (“Ordinance”) in which this Exhibit is attached. The Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS has identified significant beneficial and adverse impacts that are anticipated to occur with the future development of the Planned Action Area, together with a number of possible measures to mitigate those significant adverse impacts.

The City of Sumner has established a Planned Action designation for the East Sumner Neighborhood based on the Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS (see **Exhibit A**). SEPA Rules indicate review of a Planned Action Project is intended to be simpler and more focused than for other projects (WAC 197-11-172). This **Exhibit B** provides a modified checklist form for Planned Action Project applicants to complete, as provided pursuant to RCW 43.21C.440.

MITIGATION DOCUMENT

A Mitigation Document is provided in **Attachment B-1** to this Exhibit B, and is also summarized in the environmental checklist. **Attachment B-1** establishes specific mitigation measures, based upon significant adverse impacts identified in the Planned Action SEIS. These mitigation measures shall apply to future development proposals which are found consistent with the Planned Action thresholds in Subsection III.D of this Ordinance and the conceptual plans in Exhibit E of this Ordinance, and which are located within the Planned Action Area (see **Exhibit A**).

APPLICABLE PLANS AND REGULATIONS

The Planned Action SEIS identifies specific regulations that act as mitigation measures. These are summarized by SEIS topic in **Attachment B-2** to this Exhibit B and are advisory to applicants. All applicable federal, state, and local regulations shall apply to Planned Action Projects. Planned Action Project applicants shall comply with all adopted regulations where applicable, including those listed in the Planned Action SEIS and those not included in the Planned Action SEIS.

INSTRUCTIONS TO APPLICANTS

This environmental checklist below asks you to describe some basic information about your proposal. The City will use this checklist to determine whether the project is consistent with the analysis in the Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS and qualifies as a Planned Action Project, or would otherwise require additional environmental review under SEPA. Answer the questions briefly, with the most precise information known, or give the best description you can. You must answer each question accurately and carefully, to the best of your knowledge. The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The City may ask you to explain your answers or provide additional information.

A. PROPOSAL DESCRIPTION

Date:			
Applicant:	Name/Company:	Phone #:	Cell #:
	Mailing Address:	Email Address:	
Property Owner:	Name/Company:	Phone #:	Cell #:
	Mailing Address:	Email Address:	
Property Address	Street:	City, State, Zip Code:	
Parcel Information	Assessor Parcel Number:	Property Size in Acres:	
Give a brief, complete description of your proposal.			

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Property Zoning	District Name:		Building Type:	
Permits Requested (list all that apply)	<input type="checkbox"/> Land Use: _____ <input type="checkbox"/> Building: _____		<input type="checkbox"/> Engineering: _____ <input type="checkbox"/> Other: _____	
	All Applications Deemed Complete? Yes ___ No ___ Explain:			
	Are there pending governmental approvals of other proposals directly affecting the property covered by your proposal? Yes ___ No ___ Explain:			
Existing Land Use	Describe Existing Uses on the Site:			
Proposed Land Use – Check and Circle All That Apply	<input type="checkbox"/> Multi-family dwelling units <input type="checkbox"/> Commercial <input type="checkbox"/> Retail		<input type="checkbox"/> Open Space, Parks, Plazas, Trails, Gathering Spaces <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____	
Dwellings	# Existing Dwelling Units: # _____ Dwelling Type _____ # _____ Dwelling Type _____	# Proposed Dwelling Units: # _____ Type _____ # _____ Type _____	Proposed Density (du/ac):	
	Dwelling Threshold Total in Ordinance: New Housing Units 500		Dwelling Bank Remainder as of _____ 20____ _____ dwellings	
Non-residential Uses: Building Square Feet	Existing Square Feet: New Employment (Jobs) 581 Type of Employment: <input type="checkbox"/> Retail Square Feet _____ SF _____ Jobs <input type="checkbox"/> Commercial Office _____ SF _____ Jobs <input type="checkbox"/> Other (describe): _____ SF _____ Jobs		Proposed Square Feet: Jobs Remainder as of _____ 20____ _____ jobs	
	Existing Stories: Existing Height in feet:		Proposed Stories: Proposed Height in feet:	
Parking Spaces	Existing:		Proposed:	
PM Peak Hour Weekday Vehicle Trips	Existing Estimated Trips Total:	Future Estimated Trips Total:	Net New Trips:	
	Maximum net new primary PM peak hour trips in Ordinance: 1,746		Trip Bank Remainder as of _____ 20____ _____ dwellings	
	Source of Trip Rate: ITE Manual ___ Other ___		Transportation Impacts Determined Consistent with Ordinance Subsection III.D(3): Yes ___ No ___	

Proposed timing or schedule (including phasing).	
Describe plans for future additions, expansion, or further activity related to this proposal.	
List any available or pending environmental information directly related to this proposal.	

B. ENVIRONMENTAL CHECKLIST AND MITIGATION MEASURES

Earth Checklist and Mitigation Measures	
<p>1. Description of Conditions</p> <p>A. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____</p> <p>B. What is the steepest slope on the site (approximate percent slope)? _____</p> <p>C. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? _____</p> <p>_____</p>	<p>STAFF COMMENTS:</p>
<p>2. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.</p>	
<p>3. Has any part of the site been classified as a "geologically hazardous" area? (Check all that apply)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Landslide Hazards <input type="checkbox"/> Erosion Hazards <input type="checkbox"/> Seismic Hazards <input type="checkbox"/> Liquefaction Hazards <input type="checkbox"/> Volcanic Hazards <input type="checkbox"/> Other: _____ <p>Describe:</p>	
<p>4. Are there surface indications or history of problem soils in the immediate vicinity? If so, describe.</p>	

5. Proposed Measures to control impacts to earth, soils, and geologic hazardous areas:

THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):

- ☐ Compliance with City Erosion Control Ordinance (SMC 16.05).
- ☐ Compliance with Critical areas regulations within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas.
- ☐ Pre-loading, foundation and footing system design considerations, parking area asphalt design, and compliance with the International Building Code standards.
- ☐ Other: _____

Flooding Checklist and Mitigation Measures

1. Description of Conditions

A. Is the project site within a designated floodplain? If so, describe the type and extent of the designated floodplain:

STAFF COMMENTS:

2. Is development proposed within the designated floodplain? If so, explain in more detail:

3. Are there indications of past flooding on the property?

4. Proposed Measures to control impacts to flooding:

THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):

- ☐ Compliance with the National Flood Insurance Program (NFIP) Standards.
- ☐ Compliance with Washington State Department of Ecology Low Impact Development Manual Compliance
- ☐ Compliance with the Shoreline Master Program and Critical Areas Regulations.
- ☐ District Stormwater Facilities Constructed.
- ☐ Implementation of stream conveyance improvements for Salmon Creek. This includes the proposed realignment of a portion of Salmon Creek near its crossing under E Valley Highway E.

Plants and Animals Checklist and Mitigation Measures	
Plants and Habitat Checklist	STAFF COMMENTS:
1. Check or circle types of vegetation found on the site: <ul style="list-style-type: none"> <input type="checkbox"/> Deciduous tree: Alder, maple, aspen, other _____ <input type="checkbox"/> Evergreen tree: Fir, cedar, pine, other _____ <input type="checkbox"/> Shrubs <input type="checkbox"/> Grass <input type="checkbox"/> Pasture <input type="checkbox"/> Crop or grain <input type="checkbox"/> Orchards, vineyards or other permanent crops <input type="checkbox"/> Wet soil plants: Cattail, buttercup, bullrush, skunk cabbage, other _____ <input type="checkbox"/> Water plants: Water lily, eelgrass, milfoil, other _____ <input type="checkbox"/> Other types of vegetation: _____ 	
2. Are there wetlands on the property? Please describe their acreage and classification.	
3. Is there riparian habitat on the property?	
4. List all noxious weeds and invasive species known to be on or near the site.	
5. What kind and amount of vegetation will be removed or altered?	
6. List threatened and endangered species known to be on or near the site.	
7. Is the proposal consistent with critical area regulations? Please describe.	

<p><input type="checkbox"/> Proposed landscaping, use of native plants, buffers, or other measures to preserve or enhance vegetation on the site:</p> <p>THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):</p> <p><input type="checkbox"/> City of Sumner Shoreline Master Program (SMP).</p> <p><input type="checkbox"/> NFIP and compliance with the Biological Opinion.</p> <p><input type="checkbox"/> Critical Area Regulations that address wetlands, streams and wildlife habitat areas.</p> <p><input type="checkbox"/> City of Sumner stormwater regulations and implementation of the National Pollutant Discharge Elimination System (NPDES) requirements.</p> <p><input type="checkbox"/> Restoration of select locations along Salmon Creek.</p> <p><input type="checkbox"/> Other: _____</p> <p>Describe: _____</p>	<p>STAFF COMMENTS:</p>
<p>Fish and Wildlife</p>	
<p>8. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:</p> <p><input type="checkbox"/> Birds: Hawk, heron, eagle, songbirds, other: _____</p> <p><input type="checkbox"/> Mammals: Deer, bear, elk, beaver, other: _____</p> <p><input type="checkbox"/> Fish: Bass, salmon, trout, herring, shellfish, other: _____</p>	
<p>9. List any threatened and endangered species known to be on or near the site.</p>	
<p>10. List any invasive animal species known to be on or near the site.</p>	
<p>11. Is the proposal consistent with standard critical area buffers? Please describe.</p>	

12. Proposed measures to preserve or enhance fish and wildlife, if any:

THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):

- ☐ City of Sumner Shoreline Master Program (SMP).
- ☐ NFIP and compliance with the Biological Opinion.
- ☐ Critical Area Regulations that address wetlands, streams and wildlife habitat areas.
- ☐ City of Sumner stormwater regulations and implementation of the National Pollutant Discharge Elimination System (NPDES) requirements.
- ☐ Restoration of select locations along Salmon Creek.
- ☐ Other: _____

Describe:

Water Resources

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)?

If yes, describe type of surface water body, including their name(s), stream classification, and whether there is a 100-year floodplain.

If appropriate, state what stream or river the surface water body flows into.

STAFF COMMENTS:

2. Will the proposal require or result in (check all that apply and describe below):

- ☐ any work over, in, or adjacent to (within 200 feet) the described waters?
- ☐ fill and dredge material that would be placed in or removed from surface water or wetlands?
- ☐ surface water withdrawals or diversions?
- ☐ discharges of waste materials to surface waters?
- ☐ groundwater withdrawal or discharge?
- ☐ waste materials entering ground or surface waters?
- ☐ alterations of effects upon drainage patterns in the vicinity of the site?

Describe:

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3. Describe the source of runoff (including storm water) and method of collection, treatment, and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.	
4. Is the area designated a critical aquifer recharge area? If so, please describe:	
5. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?	
6. What measures are proposed to reduce or control water resources/stormwater impacts? THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): <ul style="list-style-type: none"> <input type="checkbox"/> Compliance with critical area regulations. <input type="checkbox"/> Compliance with SMC 13.48: stormwater management regulations. <ul style="list-style-type: none"> ○ 2012 Washington State Department of Ecology Stormwater Management Manual for Western Washington. ○ NPDES Western Washington Phase II Municipal Stormwater Permit, - Minimum Technical Requirements for New Development and Redevelopment. ○ 2005 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound. <input type="checkbox"/> Compliance with Shoreline Master Program (SMP). Other: _____	

Air Quality Checklist and Greenhouse Gases

1. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? Please describe and give quantities if known.	STAFF COMMENTS:
2. What measures are proposed to reduce or control air emissions? THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): <ul style="list-style-type: none"> <input type="checkbox"/> Compliance with Washington Department of Ecology and Puget Sound Clean Air Agency Regulations <input type="checkbox"/> Compliance with Commute Trip Reduction Ordinance. 	

<input type="checkbox"/> Air quality control plans for construction activities. <input type="checkbox"/> Best Management Practices used to control fugitive dust. <input type="checkbox"/> Measures to minimize air quality and odor issues caused by tailpipe emissions mobile construction equipment and portable stationary engines. <input type="checkbox"/> Use of Greenhouse Gas Reduction Measures per Municipal Code or Exhibits 3-14 and 3-15 of Draft SEIS. <input type="checkbox"/> Other: _____	
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Land Use and Plans and Policies Checklist

1. What is the current use of the site and adjacent properties? (Add more explanation as needed beyond description in Part A.)	STAFF COMMENTS:
2. Describe any structures on the site. Will any structures be demolished? If so, what type, dwelling units, square feet?	
3. What is the current comprehensive plan designation of the site?	
4. What is the current zoning classification of the site?	
5. If applicable, what is the current shoreline master program designation of the site?	
6. What is the planned use of the site? List type of use, number of dwelling units and building square feet.	
7. What is the tallest height of any proposed structure(s)?	
8. What are potential sources of light and glare?	
9. Does the proposal have the potential to affect solar access or cause undue shading?	

10. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):

- ☐ Consistency with Comprehensive Plan and applicable subarea plans
- ☐ Consistency with Shoreline Master Program (SMP).
- ☐ Consistency with applicable zoning standards and design guidelines.
- ☐ Other: _____

Describe these measures and how they are incorporated into the development:

Population, Employment, and Housing Checklist

1. Approximately how many people would reside or work in the completed project?

2. Approximately how many people would the completed project displace?

3. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

4. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

5. Proposed measures to avoid or reduce displacement or housing impacts, if any.

THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):

- ☐ Consistency with Comprehensive Plan and applicable subarea plans
- ☐ Consistency with applicable zoning standards and design guidelines.
- ☐ Other: _____

Describe these measures and how they are incorporated into the development:

STAFF COMMENTS:

--	--

Public Services, Capital Facilities, and Utilities Checklist	
1. Police Protection: Would the project increase demand for police services? Can City levels of service be met?	STAFF COMMENTS:
2. Fire and Emergency Services: Would the project increase demand for fire and/or emergency services? Can levels of services be met?	
3. Schools: Would the project result in an increase in demand for school services? Can levels of services be met? Is an impact fee required?	
4. Parks and Recreation: Would the project require an increase in demand for parks and recreation? Can levels of services be met? Are parks and trails provided consistent with the City's Parks, Recreation, and Open Space Plan? Is an impact fee required?	
5. Wastewater: Would the project result in an increased need for wastewater services? Can levels of service be met?	
6. Water Supply: Would the project result in an increased need for water supply or fire flow pressure? Can levels of service be met?	
7. Would the project impact stormwater quantity or quality? Can levels of service be met? Are City stormwater requirements met?	
8. Other Public Services and Utilities: Would the project require an increase in demand for other services and utilities? Can levels of services be met?	
9. Proposed measures to reduce or control direct impacts on public services. THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):	

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<input type="checkbox"/> Police Services: Adequate levels of service available to serve development (verified by levels of service studied in the Planned Action SEIS and City Police Department operations and capital plans). <input type="checkbox"/> Fire Services: Mitigation agreement between the developer and Sumner Fire & Rescue. <input type="checkbox"/> Parks and Recreation: Park space and trails are provided to be consistent with both the LOS standards of the Parks and Recreation Element of the Comprehensive Plan and this Planned Action Ordinance. <input type="checkbox"/> Water and Wastewater: Adequate service at the time of development per SMC 13.16 Adequate sewage disposal and SMC 13.24 Adequate water supply. <input type="checkbox"/> Compliance with SMC 13.48: stormwater management regulations. <input type="checkbox"/> Other Measures to reduce or control public services and utilities impacts: _____ Describe:	
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Parks and Recreation Checklist	
1. What designated and informal recreational opportunities are in the immediate vicinity?	STAFF COMMENTS:
2. Would the proposed project displace any existing recreational uses? If so, describe.	
3. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:	
<p>THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):</p> <input type="checkbox"/> Compliance with Parks and Open Space Plan Update. <input type="checkbox"/> Payment of a parks and recreation mitigation or impact fee. <input type="checkbox"/> Other Measures to reduce or control parks and recreation impacts: _____ Describe:	

Transportation Checklist

1. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.
2. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?
3. How many parking spaces would the completed project have? How many would the project eliminate?
4. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).
5. How many PM peak hour vehicular trips per day would be generated by the completed project? Attach appropriate documentation.
6. Proposed measures to reduce or control transportation impacts, if any:
 THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):
 - ☐ Trips in Ordinance Subsection III.D(3)(a) are not exceeded, the project meets the Concurrency and Intersection Standards of Subsection III.D(3)(b), and that the project has mitigated impacts consistent with Subsection III.D (3)(c).
 - ☐ Installation of required improvements necessitated by development or that are part of Planned Action (TBD).
 - ☐ Fair share contribution to improvements at City concurrency intersections and roads.
 - ☐ Other measures to reduce or control transportation impacts: _____

Describe:

STAFF COMMENTS:

Verify that:

- ☐ The Planned Action Project applicant has submitted documentation of the trips, required improvements, impact fees and other mitigation in comparison to the Planned Action SEIS and the Planned Action Ordinance.
- ☐ The City has verified incremental and total trip generation.

Other Environmental Topics: City of Sumner 2010 Comprehensive Plan Update and Amendments EIS, November 2010

Environmental Health and Noise Checklist and Mitigation Measures

1. Describe any known or possible contamination at the site from present or past uses..	STAFF COMMENTS:
2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.	
3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.	
4. Describe special emergency services that might be required.	
5. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.	
6. Proposed measures to reduce or control environmental health hazards, if any: THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): <ul style="list-style-type: none"> <input type="checkbox"/> SMC Chapter 15.24 Fire Code <input type="checkbox"/> SMC Chapter 13.484 Illicit Discharge and/or Dumping Detection and Elimination <input type="checkbox"/> Model Toxics Control Act Chapter 70.105D RCW <input type="checkbox"/> Uniform Environmental Covenants Act Chapter 64.70 RCW <input type="checkbox"/> MTCA Cleanup Regulation Chapter 173-340 WAC <input type="checkbox"/> Compliance with SMC Chapter 8.14 Noise Control measures for compatibility. <input type="checkbox"/> Other: _____ 	
Historic and Cultural Preservation	
7. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe.	STAFF COMMENTS:

<p>8. Are there any landmarks, features, or other evidence of Indian or historic use or occupation. This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.</p>
<p>9. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.</p>
<p>10. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.</p> <p>THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Condition to stop construction if remains of historic or archeological significance are found. <input type="checkbox"/> Consultation with the Washington State Department of Archaeology and Historic Preservation. <input type="checkbox"/> Where project is proposed on or immediately surrounding a site containing an archaeological resource a study is conducted by a qualified professional archaeologist <p>Describe:</p>

C. APPLICANT SIGNATURE

I DECLARE UNDER PENALTY OF THE PERJURY LAWS THAT THE INFORMATION I HAVE PROVIDED ON THIS FORM/APPLICATION IS TRUE CORRECT AND COMPLETE. I UNDERSTAND THAT THE LEAD AGENCY IS RELYING ON THEM TO MAKE ITS DECISION.

Signature:	
Date:	

D. REVIEW CRITERIA

Review Criteria

The City's SEPA Responsible Official may designate Planned Action Projects consistent with Subsection III.E of this Ordinance, if all of the following criteria are met.

Criteria	Describe how your application and proposed development meets the criteria.
(a) The proposal is located within the Planned Action area identified in Exhibit A.	
(b) The proposed uses and densities are consistent with those described in the Planned Action SEIS and Subsection III.D of this Ordinance.	
(c) The proposal is within the Planned Action thresholds and other criteria of Subsection III.D of this Ordinance.	
(d) The proposal is consistent with the Sumner Comprehensive Plan.	
(e) The proposal's significant adverse environmental impacts were identified in the Planned Action SEIS.	
(f) The proposal's significant adverse impacts have been mitigated by the application of the measures identified in this Exhibit B, Subsection III.D of this Ordinance, and other applicable city regulations, together with any modifications or variances or special permits that may be required.	
(g) The proposal complies with all applicable local, state, and/or federal laws and regulations and the SEPA Responsible Official determines that these constitute adequate mitigation.	

Criteria	Describe how your application and proposed development meets the criteria.
(h) The proposal is not an essential public facility as defined by RCW 36.70A.200(1) unless an essential public facility is accessory to or part of a development that is designated a Planned Action Project under Subsection III.E of this Ordinance.	

Determination Criteria

Applications for Planned Actions Projects shall be reviewed pursuant to the process in Subsection III.G of this Ordinance.

Requirement	Staff Comments
Applications for Planned Action Projects shall be made on forms provided by the City and shall include the Subarea SEPA checklist included in this Exhibit B.	
The application has been deemed complete in accordance with SMC Title 18 Zoning.	
The application is for a project within the Planned Action Area defined in Exhibit A of this Ordinance.	
The proposed use(s) are listed in Subsection III.D of this Ordinance and qualify as a Planned Action.	

E. SEPA RESPONSIBLE OFFICIAL DETERMINATION

A. Determination of Consistency - Qualifies as a Planned Action Project: The application is consistent with the criteria set forth in this East Sumner Planned Action Ordinance and has been determined to qualify as a Planned Action Project.

The project and underlying permit(s) review shall proceed in accordance with the applicable permit review procedures specified within SMC Title 18 Zoning, except that no SEPA threshold determination, SEIS, or additional SEPA review shall be required.

Notice of the Planned Action Determination of Consistency shall be made according to the notice requirements of the underlying project permit(s) pursuant to SMC Title 18 Zoning. If notice is not otherwise required for the underlying project permit(s), no special notice is required.

SEPA Responsible Official Signature:	
Date:	

B. Determination of Inconsistency - Does not Qualify as Planned Action Project: The application is not consistent with the criteria set forth in this East Sumner Planned Action Ordinance and has been determined to not qualify as a Planned Action Project for the following reasons:

Projects that fail to qualify as Planned Action Projects may incorporate or otherwise use relevant elements of the Planned Action SEIS, as well as other relevant SEPA documents, to meet their SEPA requirements. The SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action SEIS.

SEPA Process Prescribed: _____

SEPA Responsible Official Signature:	
Date:	

ATTACHMENT B-1

Mitigation Required for Development Applications

INTRODUCTION

The Planned Action SEIS has identified significant beneficial and adverse impacts that are anticipated to occur with the future development of the Planned Action Area, together with a number of possible measures to mitigate those significant adverse impacts. Please see Final SEIS Chapter 1 Summary for a description of impacts, mitigation measures, and significant unavoidable adverse impacts.

A Mitigation Document is provided in this **Attachment B-1** to establish specific mitigation measures based upon significant adverse impacts identified in the Planned Action SEIS. The mitigation measures in this **Attachment B-1** shall apply to Planned Action Project applications that are consistent with the Preferred Alternative range reviewed in the Planned Action SEIS and which are located within the Planned Action Area (see **Exhibit A**).

Where a mitigation measure includes the words “shall” or “will,” inclusion of that measure in Planned Action Project application plans is mandatory in order to qualify as a Planned Action Project. Where “should” or “would” appear, the mitigation measure may be considered by the project applicant as a source of additional mitigation, as feasible or necessary, to ensure that a project qualifies as a Planned Action Project. Unless stated specifically otherwise, the mitigation measures that require preparation of plans, conduct of studies, construction of improvements, conduct of maintenance activities, etc., are the responsibility of the applicant or designee to fund and/or perform.

Any and all references to decisions to be made or actions to be taken by the City’s SEPA Responsible Official may also be performed by the City’s SEPA Responsible Official’s authorized designee.

MITIGATION MEASURES

Mitigation measures are listed in full in DSEIS Chapter 3 and summarized in DSEIS Chapter 1. Following public review the measure will be incorporated into this ordinance, with appropriate edits such as modifying “should” to “shall”.

Earth

Flooding

Plants and Animals

Water Resources

Air Quality and Greenhouse Gases

Land Use

Population, Employment, and Housing

Plans and Policies

Public Services, Capital Facilities and Utilities

Parks and Recreation

Transportation

Draft

ATTACHMENT B-2

Advisory Notes to Applicants: Applicable Regulations and Commitments

The Planned Action SEIS identifies specific regulations that act as mitigation measures. These are summarized in **Table B-2.1** by SEIS topic. All applicable federal, state, and local regulations shall apply to Planned Action Projects. Planned Action Project applicants shall comply with all adopted regulations where applicable including those listed in the Planned Action SEIS and those not included in the Planned Action SEIS.

Table B-2.1. Applicable Regulations and Commitments

Applicable regulations and commitments (e.g. critical area regulations, transportation concurrency requirements, etc.) are listed in full in DSEIS Chapter 3 and summarized in DSEIS Chapter 1. Following public review the measures will be incorporated into this ordinance.

Topic	Regulation/Commitment
Earth	
Water Resources	
Plants and Animals	
Land Use Plans & Policies Aesthetics	
Transportation	
Public Services and Utilities	

EXHIBIT C

Public Agency Actions and Commitments

INTRODUCTION

Under some elements of the Planned Action SEIS, specific City or other agency actions are identified. Generally, incorporation of these actions is intended to provide for consistency within the City’s Comprehensive Plan and implementing regulations; to document pending City actions; to establish a protocol for long-term measures to provide for coordination with other agencies; or to identify optional actions that the City may take to reduce impacts. These actions are listed below in Table C.1.

Actions identified as “Proposed Concurrent Actions” refer to legislative actions proposed for adoption together with the Comprehensive Plan and Municipal Code Update. Actions identified as short term are currently underway and expected to be adopted in the next five years. Longer term and other agency actions will occur in the future, depending on need. The projected timeframe and responsible departments are identified and will be used in monitoring the implementation of this Ordinance.

This Exhibit C will be used in the monitoring process established in Section IV of this Ordinance.

Table C.1
Public Agency Mitigation Measures

Public agency actions are listed in full in DSEIS Chapter 3 and summarized in DSEIS Chapter 1. An example would be the update of non-city functional plans, e.g. water, sewer, fire, etc. Following public review the measures will be incorporated into this ordinance.

Mitigation Measures	Proposed Synchronous Amendments	Short Term: Within 5 years	Long Term	Other Agency	Estimated Year of Implementation and Responsible Department

APPENDIX D

Agricultural Land Analysis

SUMNER AGRICULTURAL LAND ANALYSIS

Draft Environmental Impact Statement Alternatives 2 and 3 would amend City planning maps to remove the Agricultural Resource Land Map designation. The conversion of the agricultural land north of Stewart Road, and in residential areas along Valley Avenue or along the edge of the East Hill would reduce the use in the city. While the resource designation would be removed from the Sumner AG zoned property, protective zoning would continue in the form of the Residential Protection zone, and the property would be subject to the federal biological opinion that limits impervious areas.

Collectively, 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.

The figures and table below provide information and analysis of whether the WAC 365-190-050 criteria are met.

Figure 1. Sumner Agricultural Resource Land Map

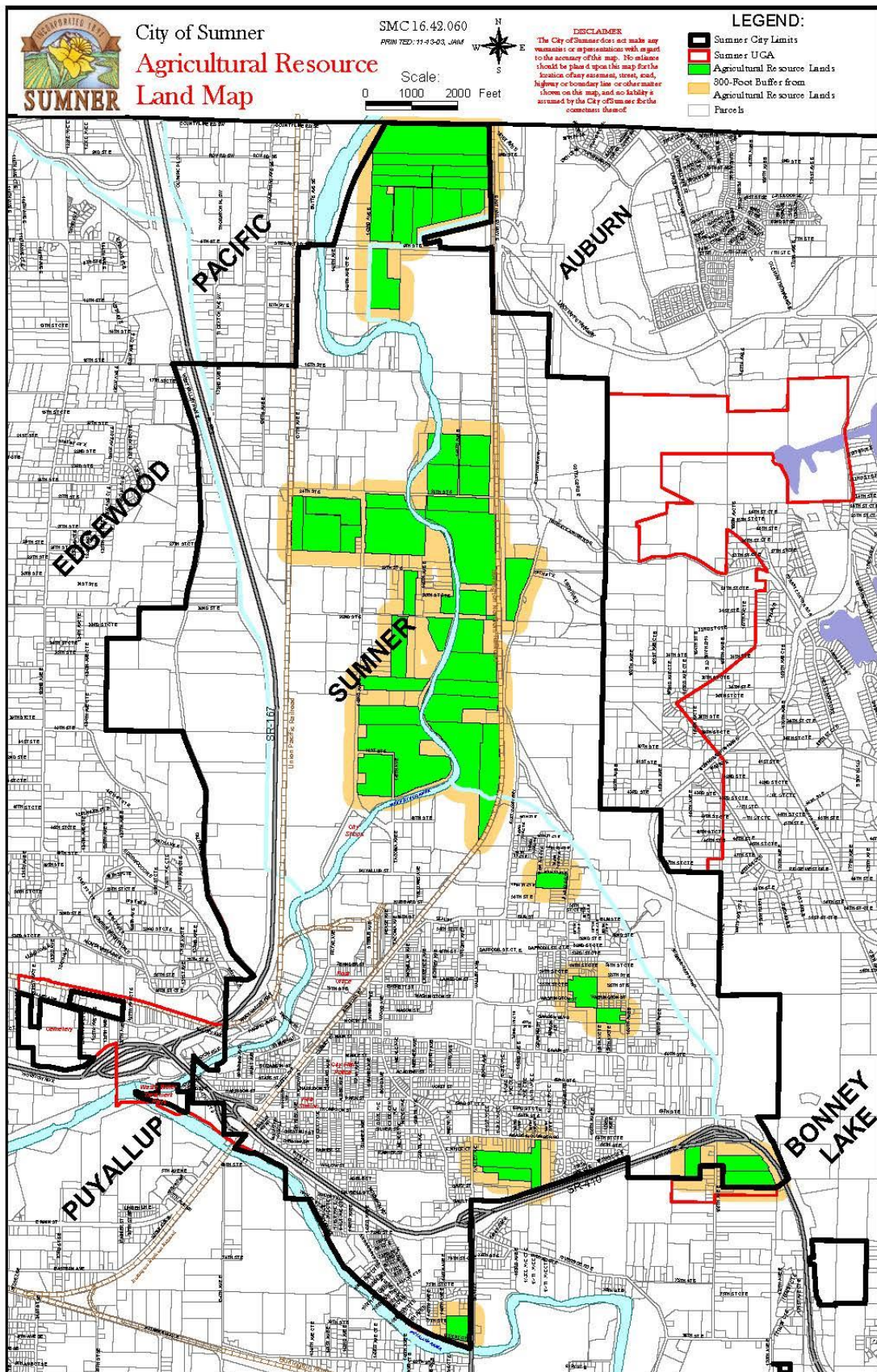


Figure 2. Sumner Current Land Uses

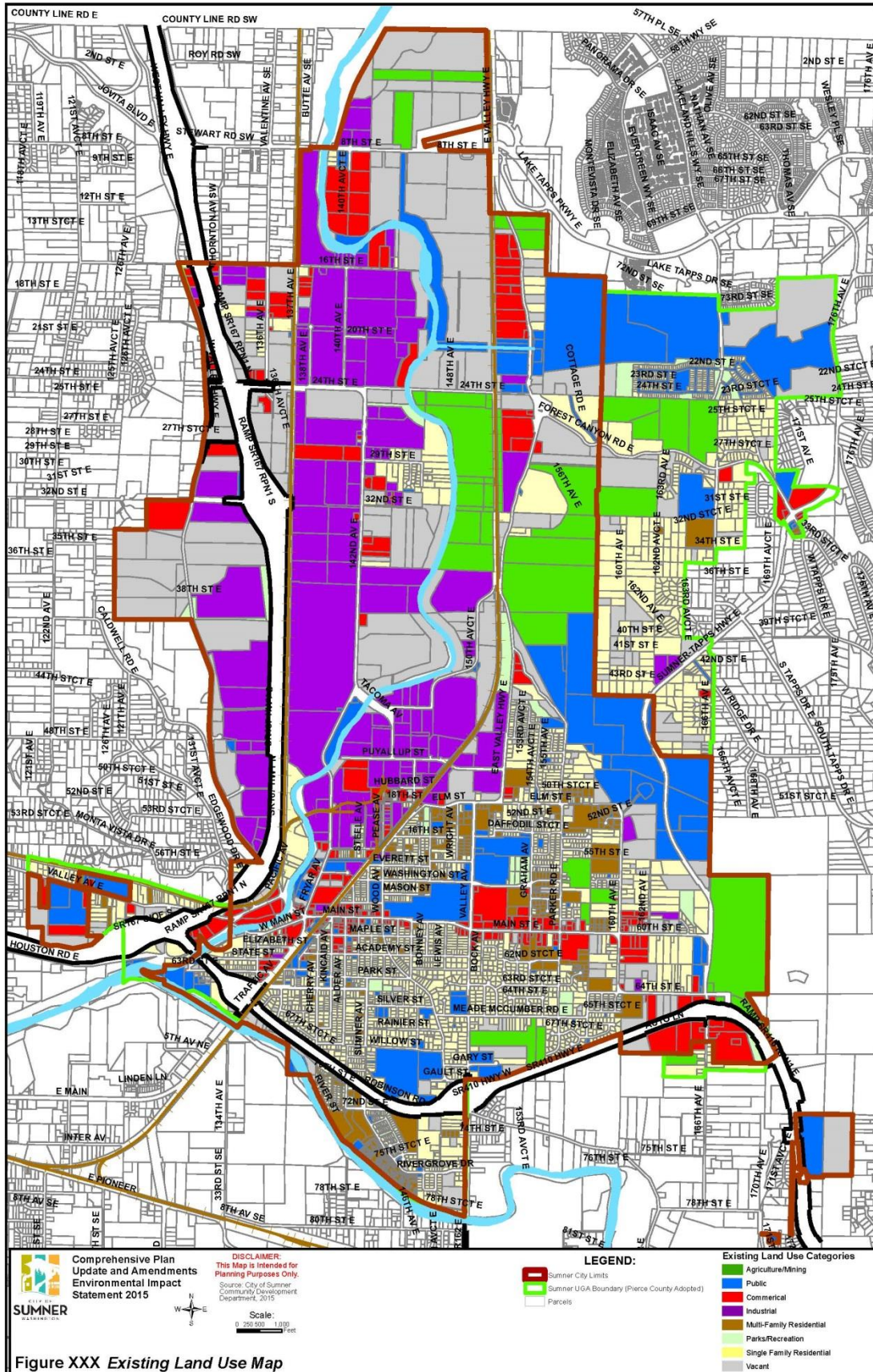


Table 1. Evaluation of Agricultural Designation Criteria

<u>WAC 365-190-050 Criteria</u>	Analysis
(1) In classifying and designating agricultural resource lands, counties must approach the effort as a county-wide or area-wide process. Counties and cities should not review resource lands designations solely on a parcel-by-parcel process. Counties and cities must have a program for the transfer or purchase of development rights prior to designating agricultural resource lands in urban growth areas. Cities are encouraged to coordinate their agricultural resource lands designations with their county and any adjacent jurisdictions.	The analysis considers all the properties that the City has mapped as the Agricultural Resource Land; see Figure 1. The land is isolated from agricultural land designated by Pierce County. The City does not have a Transfer of Development Rights Program.
2) Once lands are designated, counties and cities planning under the act must adopt development regulations that assure the conservation of agricultural resource lands. Recommendations for those regulations are found in WAC 365-196-815.	City regulations designate land and require a title notice (SMC Chapter 16.42). The City has a right to farm ordinance (SMC Chapter 16.43). The City's regulations do not meet provisions in WAC 365-196-815 in that they do not establish a purchase or transfer of development rights program, nor prevent conversion of land or address compatible use of land adjacent to the properties.
(3) Lands should be considered for designation as agricultural resource lands based on three factors:	
(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.	Portions of the land designated on the Agricultural Resource Land map are developed with industrial or residential uses and are characterized by urban growth. Some land is still in agricultural use. See Figures 1 and 2.
(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.	Some land is capable of being used for farming or is in use for farming; see Figure 2. The largest parcel in use for agriculture is the AG zoned land owned by the City of Sumner and leased for farming, such as for hay. Another notable area is used for flower growing east of Valley Avenue adjacent to and north of SR 410.

<u>WAC 365-190-050 Criteria</u>	Analysis
(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.	The analysis considers all the properties that the City has mapped as the Agricultural Resource Land. See Figure 1.
(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land.	<p>The largest area of mapped agricultural land particularly land owned by the City and zoned AG has ratings of 3 and 5:</p> <ul style="list-style-type: none"> • Class 3 soils have severe limitations that restrict the choice of plants or that require special conservation practices, or both. • Class 5 soils are subject to little or no erosion but have other limitations, impractical to remove, that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat. <p>The northern agricultural area north of Stewart Road, contains Class 3, 4, 5 and 8.</p> <p>Class 3 and 5 are described above.</p> <ul style="list-style-type: none"> • Class 4 is Class 4 soils have very severe limitations that restrict the choice of plants or that require very careful management, or both. • Class 8 soils and miscellaneous areas have limitations that preclude commercial plant production and that restrict their use to recreational purposes, wildlife habitat, watershed, or esthetic purposes. <p>The southern agricultural area near SR 410 contains Class 3 soils.</p>
(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:	
(i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service;	The central area owned by the City and zoned AG is considered Prime farmland or Prime farmland if drained. Similarly the northern and southern agricultural map areas are largely considered prime farmland or prime farmland if drained with some small exceptions.

<u>WAC 365-190-050 Criteria</u>	Analysis
(ii) The availability of public facilities, including roads used in transporting agricultural products;	Being the designated Agricultural land is in the City limits, and contains or is surrounded by urban development, there are urban services present or adjacent including: sewer, water, schools, fire protection, police services, roads, railroad, and other services and infrastructure.
(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;	Some of the designated Agricultural land is in current use tax assessment status and others are developed and not eligible.
(iv) The availability of public services;	See “ii” above.
(v) Relationship or proximity to urban growth areas;	See Figures 1 and 2 and Section “ii” above. The agricultural land is completely included in an urban growth area.
(vi) Predominant parcel size;	Parcel sizes vary. AG zoned land is larger in size (approximately 108 contiguous parcel acres).
(vii) Land use settlement patterns and their compatibility with agricultural practices;	Much of the land is developed with urban uses or is adjacent to it, including suburban and urban residential, industrial commercial uses. There is significant traffic on arterials and freeways. Generally, the pattern is not compatible with long-term agricultural uses. Regarding the City-owned AG property, the area is constrained and limited from much impervious areas due to a federal biological opinion that limits impervious areas.
(viii) Intensity of nearby land uses;	See “vii” above.
(ix) History of land development permits issued nearby;	The Sumner Comprehensive Plan and zoning identify most of the land designated as Agricultural as Industrial or Residential, except for the City AG zoned land. As a result much of the designated land has developed with allowed urban land uses over the last 20 years.
(x) Land values under alternative uses; and	<p>Current use taxation on some properties (such as that north of Stewart Road or abutting SR 410 to the south) is lower than under standard tax rates. The value of land for industrial or residential uses is consistent with an urban community.</p> <p>One of the northern properties north of Stewart Road is zoned Industrial and valued at \$1.3 million but taxed at \$230,078 as of 2015. The southern agricultural area near SR 410 is in current use taxation though zoned for Low Density Residential purposes. The taxable land value is \$16,015 as of 2015, but if it were taxed at</p>

<u>WAC 365-190-050 Criteria</u>	Analysis
	full value it would be \$313,200. One of the larger AG zoned City owned properties is valued at \$3.1 million but is taxed as \$0.00 since it is City owned.
(xi) Proximity to markets.	The land lies in the Sumner market area as well as the Pierce County and Puget Sound markets
(4) When designating agricultural resource lands, counties and cities may consider food security issues, which may include providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods.	Some of the designated land produces flowers which are sold locally. The use of the land to produce local food is not known.
(5) When applying the criteria in subsection (3)(c) of this section, the process should result in designating an amount of agricultural resource lands sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities.	The City's remnant agricultural land uses are inside the City limits and do not by themselves maintain agricultural support businesses.
(6) Counties and cities may further classify additional agricultural lands of local importance. Classifying additional agricultural lands of local importance should include, in addition to general public involvement, consultation with the board of the local conservation district and the local committee of the farm service agency. It may also be useful to consult with any existing local organizations marketing or using local produce, including the boards of local farmers markets, school districts, other large institutions, such as hospitals, correctional facilities, or existing food cooperatives. These additional lands may include designated critical areas, such as bogs used to grow cranberries or farmed wetlands. Where these lands are also designated critical areas, counties and cities planning under the act must weigh the compatibility of adjacent land uses and development with the continuing need to protect the functions and values of critical areas and ecosystems.	This is an optional requirement. The City has not classified lands of local importance.

Attachment:
Excerpts of Natural Resource Conservation Service Soils
Reports for Northern, Central and
Southern Agricultural Land Areas

Figure 3. Central Area Irrigated Capability Class



Table 2. Central Area Capability Class Table

Irrigated Capability Class— Summary by Map Unit — Pierce County Area, Washington (WA653)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
6A	Briscoat loam	4	100.3	17.3%
29A	Pilchuck fine sand		3.8	0.7%
30A	Puget silty clay loam	5	72.0	12.4%
31A	Puyallup fine sandy loam	3	173.0	29.9%
37A	Semiahmoo muck		62.0	10.7%
38A	Shalcar muck	5	8.8	1.5%
39A	Snohomish silty clay loam	5	132.4	22.9%
42A	Sultan silt loam		0.5	0.1%
47F	Xerochrepts, 45 to 70 percent slopes		5.0	0.9%
W	Water		20.8	3.6%
Totals for Area of Interest			578.5	100.0%

Figure 4. Central Area Prime Farmland Classifications



Table 3. Central Area Prime Farmland Classification Table

Farmland Classification— Summary by Map Unit — Pierce County Area, Washington (WA653)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
6A	Biscot loam	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	100.3	17.3%
29A	Pilchuck fine sand	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	3.8	0.7%
30A	Puget silty clay loam	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	72.0	12.4%
31A	Puyallup fine sandy loam	All areas are prime farmland	173.0	29.9%
37A	Semiahmoo muck	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	62.0	10.7%
38A	Shalcar muck	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	8.8	1.5%
39A	Snohomish silty clay loam	Prime farmland if drained	132.4	22.9%
42A	Sultan silt loam	All areas are prime farmland	0.5	0.1%
47F	Xerochrepts, 45 to 70 percent slopes	Not prime farmland	5.0	0.9%
W	Water	Not prime farmland	20.8	3.6%
Totals for Area of Interest			578.5	100.0%

Figure 5. Northern Area Soils Map



Table 4. Northern Area Capability Class Tables

Land Capability Classification—King County Area, Washington				
Map unit symbol and name	Pct. of map unit	Component name	Land Capability Subclass	
			Nonirrigated	Irrigated
Py—Puyallup fine sandy loam				
	75	Puyallup	3w	3w
Sm—Shalcar muck				
	75	Shalcar	5w	—
W—Water				
	100	Water	—	—

Land Capability Classification—Pierce County Area, Washington				
Map unit symbol and name	Pct. of map unit	Component name	Land Capability Subclass	
			Nonirrigated	Irrigated
2A—Aquic Xerofluvents, level				
	100	Aquic xerofluvents	5w	—
6A—Briscot loam				
	100	Briscot	4w	4w
29A—Pilchuck fine sand				
	85	Pilchuck	4w	—
31A—Puyallup fine sandy loam				
	85	Puyallup	3w	3w
38A—Shalcar muck				
	85	Shalcar	5w	5w
39A—Snohomish silty clay loam				
	85	Snohomish	5w	5w
48A—Xerorthents, fill areas				
	100	Urban land	8	—
W—Water				
	100	Water	—	—

Table 5. Northern Area Prime Farmland

Prime and other Important Farmlands—King County Area, Washington		
Map Symbol	Map Unit Name	Farmland Classification
Ma	Mixed alluvial land	Farmland of statewide importance
Os	Oridia silt loam	Prime farmland if drained
Py	Puyallup fine sandy loam	All areas are prime farmland
Sm	Shalcar muck	Prime farmland if drained
W	Water	Not prime farmland

Prime and other Important Farmlands—Pierce County Area, Washington		
Map Symbol	Map Unit Name	Farmland Classification
2A	Aquic Xerofluvents, level	Farmland of statewide importance
6A	Brisco loam	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
29A	Pilchuck fine sand	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season
31A	Puyallup fine sandy loam	All areas are prime farmland
38A	Shalcar muck	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
39A	Snohomish silty clay loam	Prime farmland if drained
48A	Xerorthents, fill areas	Not prime farmland
W	Water	Not prime farmland

Figure 6. Southern Area Soils Map

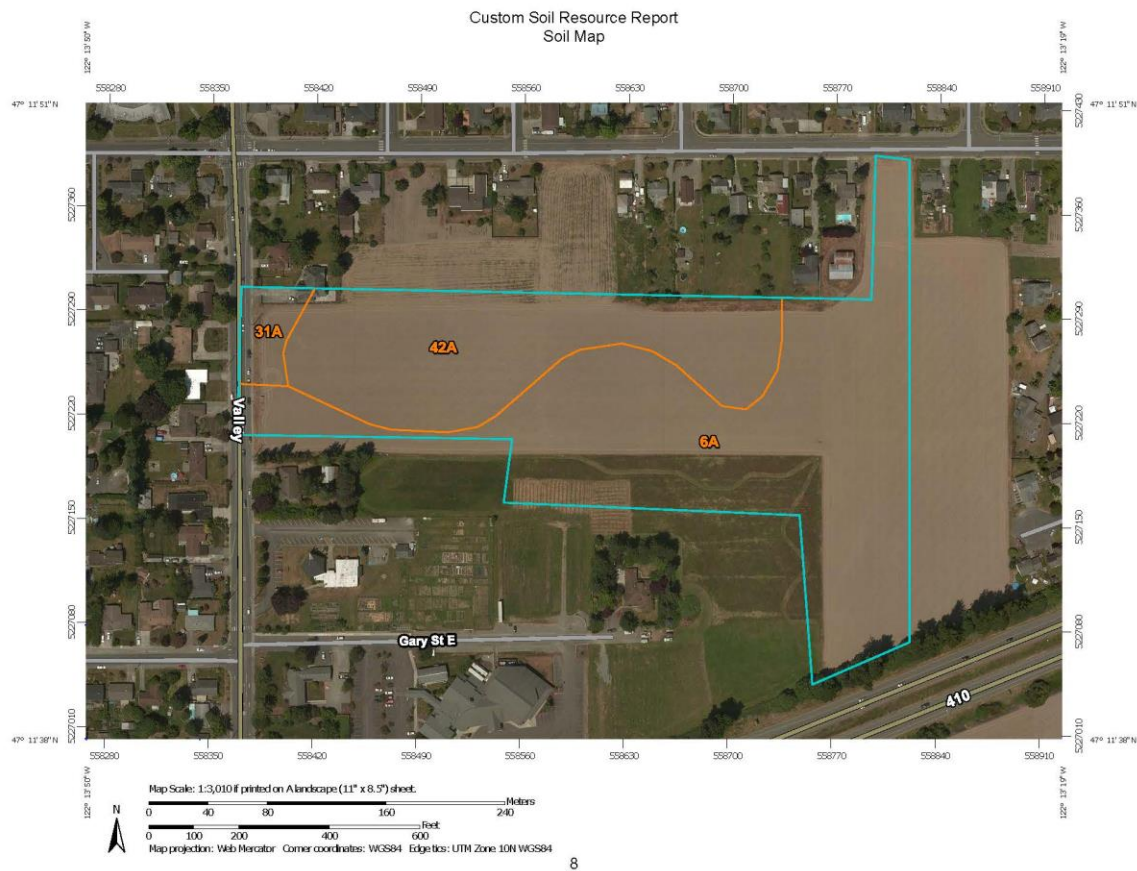


Figure 7. Southern Area Map Unit Legend

Pierce County Area, Washington (WA653)			
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
6A	Briscot loam	10.3	62.9%
31A	Puyallup fine sandy loam	0.6	3.6%
42A	Sultan silt loam	5.5	33.5%
Totals for Area of Interest		16.4	100.0%

Table 6. Southern Capability Class Table

6A—Briscot loam	Land capability classification (irrigated): 4w Land capability classification (nonirrigated): 4w
31A—Puyallup fine sandy loam	Land capability classification (irrigated): 3w Land capability classification (nonirrigated): 3w
42A—Sultan silt loam	Land capability classification (irrigated): None specified; Land capability classification (nonirrigated): 3w

Table 7. Southern Prime Farmland

Prime and other Important Farmlands–Pierce County Area, Washington		
Map Symbol	Map Unit Name	Farmland Classification
6A	Briscot loam	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
31A	Puyallup fine sandy loam	All areas are prime farmland
42A	Sultan silt loam	All areas are prime farmland