

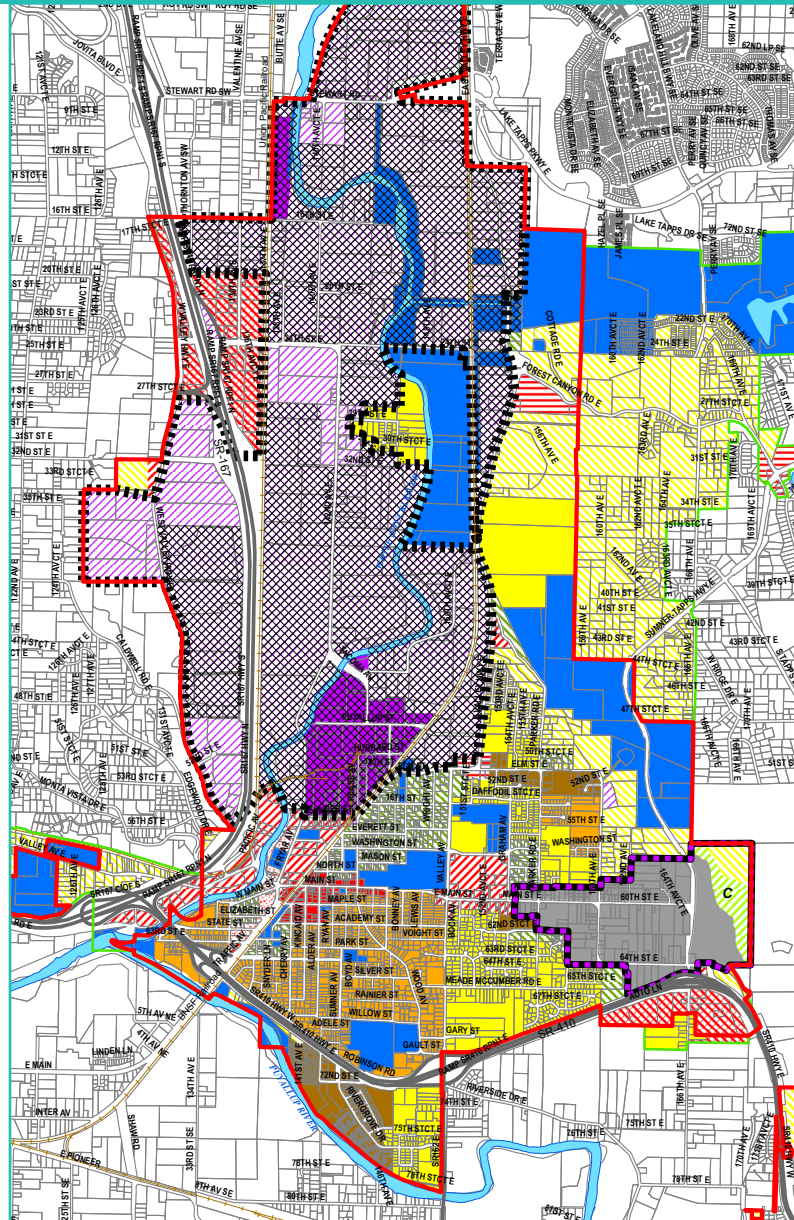
# FINAL

City of Sumner

## VOLUME II: SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

August 2015

Prepared for: Final 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  
**SUMNER**  
WASHINGTON

1104 Maple Street, Sumner WA 98390

**COMMUNITY DEVELOPMENT DEPARTMENT**

253-299-5520

July 31, 2015

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

Dear Reader:

The City of Sumner has issued a Final Supplemental Environmental Impact Statement (Final SEIS) for the adoption of 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 City is using an integrated SEPA/GMA process in accordance with Washington Administrative code (WAC) 197-11-210 to 197-11-238.

The purpose of this 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 analyzed 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.

This Final SEIS responds to public and agency comments received on the Draft SEIS, issued on February 24, 2015 and provides corrections and clarifications to the environmental analysis contained in the Draft SEIS. The Final SEIS also evaluates a Preferred Alternative identified by the Planning Commission, which is a variation of Alternative 3 and includes a revised land use and zoning plan for East Sumner resulting in slightly less housing and employment capacity than Alternative 3 and other minor changes. The Preferred Alternative for East Sumner includes substantial public improvements including an off-site wetland mitigation bank and new and existing street improvements to support future growth and development. The Preferred Alternative supports the transition of East Sumner into a vibrant urban village with a mix of uses and public amenities in a compact and walkable development pattern.

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 a long horizontal stroke at the end of the name.

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 64<sup>th</sup> 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 ~~1150~~ 11507 units above No Action) due 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 60<sup>th</sup> Street East. Establish an off-site mitigation bank, likely 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
- 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.

### **Planning Commission Preferred Alternative**

The City of Sumner proposes to select a Preferred Alternative within the range of the population, housing, and employment capacities of the three alternatives analyzed in the Draft SEIS both city-wide and in the East Sumner Neighborhood. The Preferred Alternative, as guided by the Planning Commission recommendations, includes the following:

- Alternative 3 City-wide (outside of the East Sumner Neighborhood) with the following amendments:
  - Update 2040 Vision Statement
  - Add policy language on greenhouse gas emissions and energy use in the Environment and Transportation Elements
  - Add adopted LOS for SR 410 and SR 162 to the Transportation Element
  - Add 20-year project list the Transportation Plan
  - Add a multi-modal LOS to the Transportation Plan
  - Add policy language on disaster prevention and recovery strategies to the Transportation Element
  - Add policy language to the Housing Element to develop a housing strategy by 2017
  - Add policy language in the Housing Element establishing a minimum density in the MUD Zone of 15 du/acre
  - Add sub-policy in the Environment Element to require trees or other vegetated barriers to buffer vulnerable populations from busy roadways
  - Add policy language in support of partnerships to address biodiversity
  - Amend policy language in support of biodiversity including in the vision and values statements
  - Amend the Neighborhood Commercial and East Sumner Urban Village Overlay standards to allow for cottage housing and zero lot line housing
  - Add policy language to the Plan and Monitoring sub-element clarifying that the Comprehensive Plan shall be updated based on the 8-year periodic review requirement per GMA
- East Sumner Preferred Alternative, including:
  - Public improvements consistent with Alternative 3
    - New and existing street improvements
    - Off-site wetland mitigation bank
  - Revised Zoning Designations:

- Increase General Commercial (GC) Zoning by 46 acres
- Reduce Neighborhood Commercial (NC) Zoning by 56 acres
- Reduce High Density Residential (HDR) Zoning by 4 acres
- Add 11 acres of Medium Residential (MDR) Zoning
- Increase Low Density Residential 12000 (LDR-12) Zoning by 5 acres
- Increase Low Density Residential 8500 (LDR-8.5) Zoning by 2 acres
- Assumption of 100% commercial development south of the proposed 62<sup>nd</sup> Street SE
- The following housing and employment capacity in East Sumner, which is within the range of the alternatives analyzed in the DSEIS:
  - Housing Capacity of 439 units
  - Employment Capacity of 529 jobs
- Planned Action Ordinance based on the Preferred Alternative

Other options being considered that are not included in the Planning Commission's Preferred Alternative:

- Rezone 100 Acres of City owned property from "Agriculture" to "Resource Protection". Resource Protection provides for similar land uses, including agriculture, as the proposed "Residential Protection" zoning analyzed in the DSEIS.

## Proponent

City of Sumner

## Tentative Date of Implementation

~~June 30, 2015~~ Summer 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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## Contact Person

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Planning Manager  
City of Sumner  
Community Development Department  
1104 Maple Street, suite 250



Sumner, WA 98390-1423

## 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.

## Authors and Principal Contributors to the SEIS

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## Final SEIS Date of Issuance

August 6, 2015

## Draft SEIS Date of Issuance

February 24, 2015

## ~~Draft SEIS Comment Due Date~~

~~April 24, 2015~~

## Public Comment Opportunities

The City established a 60-day public and agency comment period on the Comprehensive Plan, East Sumner Neighborhood Plan, Capital Facilities Plan, Transportation Plan, development regulations, and

~~Draft SEIS from February 24, 2015 to April 24, 2015. The Planning Commission held public hearings during that period on March 19<sup>th</sup> and April 2<sup>nd</sup> 2015. Responses to written and public hearing comments are provided in this Final SEIS. 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~~ Date of Final Action

~~Anticipated City of Sumner action is June 2015. See Tentative Date of Implementation Above. The City anticipates taking final action on the adoption of the Comprehensive Plan, East Sumner Neighborhood Plan, Capital Facilities Plan, Transportation Plan, and development regulations on July 20, 2015 in the Summer of 2015.~~

## 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:

- 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 Final Supplemental Environmental Impact Statement Cost and Availability

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

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**Appendix A: Revised Draft Planned Action Ordinance**

**Appendix B: Staff Report on Preferred Alternative (June 19, 2015)**

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**Appendix D: Level of Service (LOS) Summary Table**



## 1.0 SUMMARY

This Chapter summarizes significant impacts, mitigation measures, and significant unavoidable adverse impacts in this SEIS. Text that has been inserted or deleted since the Draft SEIS is shown in ~~strikeout~~ or underline format.

### 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 the~~ Draft SEIS ~~is was~~ 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

The ~~is~~ Draft SEIS provides ~~sd~~ a qualitative and quantitative analysis of environmental impacts as appropriate to the general nature of a comprehensive plan update. The adoption of comprehensive

## SUMNER COMPREHENSIVE PLAN UPDATE SEIS SUMMARY

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 ~~is 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~~ ~~was~~ initiated with issuance of this Draft EIS, and public meetings ~~will be~~ ~~were~~ held as identified in the fact sheet at the front of this document.

### Study Area

For the purposes of ~~this the 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 ~~of the DSEIS~~ 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



## SUMNER COMPREHENSIVE PLAN UPDATE SEIS SUMMARY

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 the](#) 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.

**Error! Reference source not found.** depicts Comprehensive Plan land use designations under the No Action Alternative; **Error! Reference source not found.** 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 allocation<sup>1</sup>.

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

### Alternative 2: Minimal Zoning Action

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

- 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 surplus.
- 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.

### **Planning Commission Preferred Alternative**

The City of Sumner proposes to select a Preferred Alternative within the range of the population, housing, and employment capacities of the three alternatives analyzed in the Draft SEIS both city-wide and in the East Sumner Neighborhood. The Preferred Alternative, as guided by the Planning Commission recommendations, includes the following:

- Alternative 3 City-wide (outside of the East Sumner Neighborhood) with the following amendments:
  - Update 2040 Vision Statement
  - Add policy language on greenhouse gas emissions and energy use in the Environment and Transportation Elements
  - Add adopted LOS for SR 410 and SR 162 to the Transportation Element
  - Add 20-year project list the Transportation Plan
  - Add a multi-modal LOS to the Transportation Plan
  - Add policy language on disaster prevention and recovery strategies to the Transportation Element
  - Add policy language to the Housing Element to develop a housing strategy by 2017
  - Add policy language in the Housing Element establishing a minimum density in the MUD Zone of 15 du/acre
  - Add sub-policy in the Environment Element to require trees or other vegetated barriers to buffer vulnerable populations from busy roadways
  - Add policy language in support of partnerships to address biodiversity
  - Amend policy language in support of biodiversity including in the vision and values statements
  - Amend the Neighborhood Commercial and East Sumner Urban Village Overlay standards to allow for cottage housing and zero lot line housing
  - Add policy language to the Plan and Monitoring sub-element clarifying that the Comprehensive Plan shall be updated based on the 8-year periodic review requirement per GMA
- East Sumner Preferred Alternative, including:
  - Public improvements consistent with Alternative 3
    - New and existing street improvements
    - Off-site wetland mitigation bank
  - Revised Zoning Designations:
    - Increase General Commercial (GC) Zoning by 46 acres
    - Reduce Neighborhood Commercial (NC) Zoning by 56 acres
    - Reduce High Density Residential (HDR) Zoning by 4 acres
    - Add 11 acres of Medium Residential (MDR) Zoning
    - Increase Low Density Residential 12000 (LDR-12) Zoning by 5 acres
    - Increase Low Density Residential 8500 (LDR-8.5) Zoning by 2 acres
  - Assumption of 100% commercial development south of the proposed 62<sup>nd</sup> Street SE

- The following housing and employment capacity in East Sumner, which is within the range of the alternatives analyzed in the DSEIS:
  - Housing Capacity of 439 units
  - Employment Capacity of 529 jobs
- Planned Action Ordinance based on the Preferred Alternative

Other options being considered that are not included in the Planning Commission's Preferred Alternative:

- Rezone 100 Acres of City owned property from "Agriculture" to "Resource Protection". Resource Protection provides for similar land uses, including agriculture, as the proposed "Residential Protection" zoning analyzed in the DSEIS.

## 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

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Designation would be applied along East Main Street. GC zoning would be applied along 64<sup>th</sup> 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 60<sup>th</sup> Street East. Establish an off-site mitigation bank, likely at City AG zoned property south of 24<sup>th</sup> 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 24<sup>th</sup> 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

### ES: Planning Commission Preferred Alternative

The Preferred Alternative in East Sumner is a variation of Alternative 3 with the proposed public improvements and a revised zoning map which results in slightly less housing and employment capacity. The following is a summary of the Preferred Alternative in East Sumner:

- Public improvements consistent with Alternative 3
  - New and existing street improvements
  - Off-site wetland mitigation bank
- Revised Zoning Designations:
  - Increase General Commercial (GC) Zoning by 46 acres
  - Reduce Neighborhood Commercial (NC) Zoning by 56 acres

- Reduce High Density Residential (HDR) Zoning by 4 acres
- Add 11 acres of Medium Residential (MDR) Zoning
- Increase Low Density Residential 12000 (LDR-12) Zoning by 5 acres
- Increase Low Density Residential 8500 (LDR-8.5) Zoning by 2 acres
- Assumption of 100% commercial development south of the proposed 62<sup>nd</sup> Street SE
- The following housing and employment capacity in East Sumner, which is within the range of the alternatives analyzed in the DSEIS:
  - Housing Capacity of 439 units
  - Employment Capacity of 529 jobs
- Planned Action Ordinance based on the Preferred Alternative

### SEPA Tools: Planned Action or Infill Exemption

The City of Sumner is considering a adoption of a Planned Action Ordinance ~~application of one of two SEPA tools~~ in East Sumner that will 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.~~ An updated planned action ordinance has been provided for consideration by the City and is located in Appendix A. 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 deficient 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.
- 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.

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- The population, housing and employment capacities between the two action alternatives are generally consistent.

**Exhibit 1-1. Alternatives Comparison**

<b>Feature</b>	<b>Alt 1: No Action</b>	<b>Alt 2: Minimal Zoning</b>	<b>Alt 3: Assertive Collaborative</b>	<b>Preferred Alternative</b>
Land Area (Acres)	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931
Population Capacity (Persons)	13,184	13,547	13,610	13,476
Housing Capacity (Dwelling Units)	5,988	6,155	6,183	6,122
Employment Capacity (Jobs)	21,909	21,909	22,262	22,210
Comprehensive Plan Amendments	None	Medium Density Residential to M-1 along East Valley Highway Update Comp Plan Elements to address 2010-35 growth, housekeeping items, and for consistency Updated East Sumner Neighborhood Plan	Same as Alternative 2  Same as Alternative 2  Same as Alternative 2	Same As Alternatives 2 + 3  Same As Alternatives 2 + 3  Same As Alternatives 2 + 3
Development Regulation Amendments	None	Critical Areas, Downtown Building Heights, Parking, and eliminating Condo Requirements, Implement Sumner Meadows Zoning Changes, Subdivision Regulations, Concurrency Requirements	Same as Alternative 2	Similar to Alternatives 2 + 3 with changes as noted in the Preferred Alternative summary
Zoning Changes	None	Upzone to allow for mixed-use development, multi-family residential, and local and regional retail	Same as Alternative 2	Similar to Alternatives 2 and 3, but capacity for housing and jobs is between Alternatives 2 + 3
Public Improvements	None	Improvements to Main Street	New Street Improvements, Off-site Wetland Mitigation Bank, Open Space, Trails	Same As Alternative 3

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.

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- 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. The Preferred Alternative in this Final SEIS carries forward the growth range of Alternatives 2 and 3 as the preferred alternative range. Thus the results of the Draft SEIS analysis, as clarified in this Final SEIS, continue to apply to the preferred plans.](#)

**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
<b>Earth</b>			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>		
Impacts of Each Alternative	<ul style="list-style-type: none"> <li>▪ Developments near the former Sumner 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Impacts are consistent with the No Action Alternative.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Impacts are consistent with the No Action Alternative.</li> </ul>



Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>▪ Impacts are consistent with the Impacts Common to All Alternatives.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>
Mitigation Measures	<p><b>Incorporated Plan Features</b></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><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>▪ The City has adopted the International Building Code (SMC 15.08.010) and a City Erosion Control Ordinance (SMC 16.05) to reduce impacts caused by earthquakes, soil instability and erosion.</li> <li>▪ 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.)</li> </ul> <p><b>Other Potential Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ The City could pursue implementation of mitigation measures outlined in the Pierce County Natural Hazard Mitigation Plan.</li> <li>▪ 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.</li> </ul>		
<b>Flooding</b>			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>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.</li> </ul>		
Impacts of Each Alternative	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts are consistent with the Impacts Common to All Alternatives and the No Action Alternative.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts are consistent with the Impacts Common to All Alternatives and the No Action Alternative.</li> </ul>
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
Mitigation Measures	<p><b>Incorporated Plan Features</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> <p><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>The City will continue to implement requirements of the NFIP to protect new and existing development in and near floodplains.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ The City will continue to cooperate with Pierce County Water Programs and King County implement conveyance improvements required along rivers.</li> <li>▪ The City will continue to enforce the Shoreline Master Program and critical area regulations as currently adopted or as amended in the future.</li> </ul> <p><b>Other Potential Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>▪ Several regional floodplain conveyance and connectivity improvements are proposed as part of the 24<sup>th</sup> 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 142<sup>nd</sup> 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.</li> <li>▪ In addition to current plans and regulations the City should:               <ul style="list-style-type: none"> <li>○ Implement a zero-rise policy for development in floodways and floodplains</li> <li>○ Add new Comprehensive Plan policies to further support Low Impact Development (LID)</li> <li>○ Consider district stormwater treatment facilities in East Sumner.</li> <li>○ Consider other options for complying with the Biological Opinion, including:                   <ul style="list-style-type: none"> <li>○ Restrict development in the 100-year floodplain</li> <li>○ Adopt the model ordinance</li> <li>○ Submit City regulations and a checklist to document compliance under existing regulations.</li> </ul> </li> </ul> </li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>		
<b>Plants and Animals</b>			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> <li>▪ <b>Vegetation</b> - 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.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>▪ <b>Fish and Wildlife Habitat</b> - 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.</li> </ul>		
Impacts of Each Alternative	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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 mitigation would be beneficial compared to existing wetlands given their fragmentation and invasive species.</li> </ul>
Mitigation Measures	<p><b>Incorporated Plan Features</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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 24<sup>th</sup> 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.</li> <li>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.</li> </ul> <p><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>City of Sumner Shoreline Master Program (SMP)</li> <li>NFIP and compliance with the Biological Opinion</li> <li>Critical Area Regulations that address wetlands, streams and wildlife habitat areas</li> <li>City of Sumner stormwater regulations and implementation of the National Pollutant Discharge Elimination System (NPDES) requirements</li> </ul> <p><b>Additional Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>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 45<sup>th</sup> St. Ct. E and 154<sup>th</sup> 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.</li> </ul>		
<b>Water Resources</b>			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>		
Impacts of Each Alternative	<ul style="list-style-type: none"> <li>Impacts are consistent with the Impacts Common to All Alternatives</li> </ul>	<ul style="list-style-type: none"> <li>Impacts are consistent with the Impacts Common to All Alternatives</li> </ul>	<ul style="list-style-type: none"> <li>Proposed rezoning will result in higher impervious surface allowances increasing the potential for increased stormwater runoff.</li> </ul>
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>Impacts are consistent with the Impacts Common to All Alternatives</li> </ul>	<ul style="list-style-type: none"> <li>Proposed rezoning will result in higher impervious surface allowances, but infill development may improve water quality by improving stormwater management and treatment.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
Mitigation Measures	<p><b>Incorporated Plan Features</b></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"> <li>Monitoring surface water discharges to provide a sufficient data base for determining if water quality is being maintained.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p>There will be no change to these features by any of the proposed alternatives.</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p><b>Applicable Regulations and Commitments</b></p> <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"> <li>▪ 2012 Ecology Stormwater Management Manual for Western Washington</li> <li>▪ NPDES Western Washington Phase II Municipal Stormwater Permit, Minimum Technical Requirements for New Development and Redevelopment</li> <li>▪ 2005 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound</li> </ul> <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>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
<p style="text-align: center;"><b>Additional Mitigation Measures</b> None proposed.</p>			
<p><b>Air Quality and Greenhouse Gases (GHG)</b></p>			
<p>Impacts Common to All Alternatives</p>	<ul style="list-style-type: none"> <li>▪ <b>Construction Impacts</b> - 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-related emissions would temporarily increase.</li> <li>▪ <b>Operational Impacts</b> – 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 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.</li> </ul>		
<p>Impacts of Each Alternative</p>	<ul style="list-style-type: none"> <li>▪ Impacts are consistent with the Impacts Common to All Alternatives. The increase in metric tons CO<sub>2</sub>e per year above existing would equal 831,234. The Forecast Daily Vehicle Miles Travelled (VMT) would be the least at 105,069.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Impacts are generally consistent with the Impacts Common to All Alternatives with an expected increase of 2,537 metric tons CO<sub>2</sub>e above Alternative 1.</li> <li>▪ This GHG emissions increase above No Action is less than what is considered significant (less than 25,000 metric tons CO<sub>2</sub>e), and implementation of Alternative 2 should not require mitigation measures beyond those required to comply with existing air quality regulations.</li> <li>▪ Alternative 2 would result in approximately 110,135 VMT per day, which is only 0.13% of the total VMT in the region.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Greenhouse gas emissions are greater under Alt 3, but constitute a “business as usual increase” of 19,853 metric tons of CO<sub>2</sub>e above Alternative 1.</li> <li>▪ 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 CO<sub>2</sub>e per year.</li> <li>▪ Alternative 3 would result in approximately 110,465 VMT per day, which is only 0.13% of the total VMT in the region.</li> </ul>



Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>▪ Impacts are consistent with the Impacts Common to All Alternatives</li> </ul>	<ul style="list-style-type: none"> <li>▪ Impacts are considered cumulatively with the citywide analysis.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>
Mitigation Measures	<p data-bbox="573 653 857 684"><b>Incorporated Plan Features</b></p> <p data-bbox="573 688 1487 779">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"> <li>▪ Commuter Rail/Regional Transit Sub-Element</li> <li>▪ Economic Development Element</li> <li>▪ Community Character Element</li> <li>▪ Environment Element</li> <li>▪ Transportation Element</li> </ul> <p data-bbox="573 978 1487 1041">Additionally, action alternatives would include new environmental element policies regarding climate change and sustainability.</p> <p data-bbox="573 1052 997 1083"><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>▪ <b>National Ambient Air Quality Standards:</b> 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.</li> <li>▪ <b>State Ambient Air Quality Standards:</b> Ecology establishes state ambient air quality standards for the same six pollutants that are at least as stringent as the national standards; in the case of SO<sub>2</sub>, state standards are more stringent. Table 3.5-1 lists the state ambient air quality standards for six criteria pollutants.</li> <li>▪ <b>Indoor Burning Smoke Reduction Zone:</b> PSCAA and Ecology’s regulatory framework for wood smoke includes: <ul style="list-style-type: none"> <li>○ More stringent emission standards for new wood burning devices than the federal EPA standards</li> <li>○ Opacity standards for wood-burning appliances</li> <li>○ Prohibitions on burning of certain materials or non-certified wood stoves</li> <li>○ Burn ban curtailment program</li> <li>○ Special attainment area provisions</li> </ul> </li> <li>▪ <b>Outdoor Burning:</b> Burning yard waste and land-clearing debris is not allowed at any time in in the City or in Pierce County. PSCAA enforces state outdoor burning regulations required by RCW 70.94.743.</li> <li>▪ <b>Puget Sound Clean Air Agency Regulations:</b> 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.</li> </ul>		

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	<ul style="list-style-type: none"> <li>▪ <b>State of Washington GHG Laws:</b> As described above in State of Washington Greenhouse Gas Requirements, Washington enacted a new law establishing GHG reduction limits.</li> <li>▪ <b>City of Sumner Ordinance 1587:</b> 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.</li> </ul> <p><b>Other Potential Mitigation Measures</b></p> <p>Construction Emission Control</p> <ul style="list-style-type: none"> <li>▪ The City should require all construction contractors to implement air quality control plans for construction activities in the study area. The air quality control plans should include Best Management Practices to control fugitive dust and odors emitted by diesel construction equipment.</li> <li>▪ During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. The following Best Management Practices would be used to control fugitive dust:               <ul style="list-style-type: none"> <li>○ Use water sprays or other non-toxic dust control methods on unpaved roadways.</li> <li>○ Minimize vehicle speed while traveling on unpaved surfaces.</li> <li>○ Prevent track-out of mud onto public streets.</li> <li>○ Cover soil piles when practical.</li> <li>○ Minimize work during periods of high winds when practical.</li> </ul> </li> <li>▪ Mobile construction equipment and portable stationary engines would emit air pollutants including NO<sub>x</sub>, CO, and diesel particulate matter. These emissions would be temporary and localized. It is highly unlikely that the temporary emissions would cause ambient pollutant concentrations at adjoining parcels to approach the federal limits. Typical mitigation measures to minimize air quality and odor issues caused by tailpipe emissions include the following:               <ul style="list-style-type: none"> <li>○ Maintain the engines of construction equipment according to manufacturers' specifications.</li> <li>○ Minimize idling of equipment while the equipment is not in use.</li> </ul> </li> <li>▪ Burning of slash or demolition debris would not be permitted without express approval from the PSCAA. No slash burning is anticipated for any construction projects in the study area.</li> </ul> <p>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"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<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"> <li>▪ 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.</li> </ul> <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 <b>Error! Reference source not found.</b> and <b>REF_Ref412308349 \h Error! Reference source not found.</b>. The measures presented in <b>Error! Reference source not found.</b> and <b>Error! Reference source not found.</b> 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>		
<b>Land Use</b>			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Approximately 469 acres currently in agricultural, mining, or timber use would be converted to non-resource uses under all alternatives. Approximately 260 acres would convert to residential uses, approximately 26 acres would convert to industrial use and 0.7 acres would convert to mixed uses.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>		
Impacts of Each Alternative	<ul style="list-style-type: none"> <li>▪ Impacts are consistent with the Impacts Common to All Alternatives</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> </ul>
Mitigation Measures	<p><b>Incorporated Plan Features</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>▪ Design review is required for all new multifamily, commercial, and industrial developments; the review must consider the context of the site and potential for incompatibility.</li> <li>▪ 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.</li> <li>▪ Certain land uses are subject to conditional use review, which includes a more detailed review of land use compatibility.</li> </ul> <p><b>Other Potential Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>▪ The City could review zoning and subdivision regulations to ensure that adequate setbacks, landscaping, and buffering are required where land use conflicts may occur.</li> <li>▪ 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.</li> </ul>		
<b>Population, Employment, and Housing</b>			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> <li>▪ Population and employment would increase under all alternatives, though locations of growth would differ.</li> <li>▪ All alternatives would provide the same level of growth in the UGA.</li> <li>▪ Indirect impacts of growth under each alternative would likely include potential encroachment near natural environmental resources and increases in demand for facilities and infrastructure.</li> </ul>		

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"> <li>▪ 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.</li> <li>▪ Alternative 1 would provide less population and housing than Alternatives 2 and 3.</li> <li>▪ Alternative 1 would provide the same amount of jobs as Alternative 2, but fewer than Alternative 3.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Alternative 2 can meet population, housing and employment estimates at 2035.</li> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Alternative 3 can meet population, housing and employment targets at 2035.</li> <li>▪ 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.</li> </ul>
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>▪ Under this alternative, there would not be any significant change to the existing zoning.</li> <li>▪ Land conversion to other uses consistent with existing zoning, infill development and platting of larger single family and vacant lots may occur.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>
Mitigation Measures	<p><b>Incorporated Plan Features</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Action Alternatives would update housing and economic development policies as described in Chapter 2.</li> </ul> <p><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>▪ Zoning regulations implement the City Comprehensive Plan to further its policies for business development, population and residential growth, and community character.</li> <li>▪ The City’s zoning code furthers Comprehensive Plan policies for housing density, types of housing, and character.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<p><b>Other Potential Mitigation Measures</b></p> <p>The SEIS describes the current and future needs for affordable housing. Additional mitigation measures include:</p> <ul style="list-style-type: none"> <li>▪ Coordinating with the Pierce County Housing Authority and local non-profit agencies that provide affordable and transitional housing in the Sumner area.</li> <li>▪ The City could adopt multifamily tax exemptions for market-rate and affordable dwellings in the Town Center.</li> <li>▪ 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.</li> <li>▪ Providing affordable housing incentives and supporting affordable housing programs sponsored by Pierce County Housing Authority and/or other regional housing agencies.</li> </ul>		
<p><b>Plans and Policies</b></p>			
<p>Impacts Common to All Alternatives</p>	<p><b>Growth Management Act</b></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"> <li>▪ All alternatives would guide growth in urban areas.</li> <li>▪ All alternatives would reduce sprawl by allowing for urban level employment and residential uses in city limits.</li> <li>▪ All alternatives recognize property rights.</li> <li>▪ All alternatives retain open space, enhance recreational opportunities, and conserve fish and wildlife habitat.</li> <li>▪ All alternatives increase the demand for public facilities and services and would require mitigation measures to ensure adequate facilities and services.</li> <li>▪ 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.</li> <li>▪ All alternatives foster citizen participation and are undergoing public review as part of the SEPA process.</li> </ul> <p><b>Multicounty Planning Policies</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ All alternatives focus growth in the city limits.</li> <li>▪ All alternatives would add traffic to the road system, but would be required to meet City concurrency standards.</li> </ul> <p><b>Adjacent City Plans</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul>		
<p>Impacts of Each Alternative</p>	<ul style="list-style-type: none"> <li>▪ Alternative 1 would not meet housing target estimates in 2035.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Alternative 2 would update the Comprehensive Plan and development regulations consistent with GMA.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Alternative 3 would update the Comprehensive Plan and development regulations consistent with GMA.</li> </ul>

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>▪ Alternative 1 would not update the Comprehensive Plan or development regulations consistent with GMA.</li> <li>▪ Alternative 1 would not warrant any immediate changes to the Sumner Zoning Code.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Alternative 3 would implement greater housing variety in the Town Center and East Sumner but reduce housing options along East Valley Highway.</li> <li>▪ Alternative 3 would allow for offsite wetland mitigation from East Sumner.</li> <li>▪ Alternative 3 would remove the Agricultural Resource Land Map designation as with Alternative 2.</li> </ul>
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The plan update maintains the key elements of the vision established in the original plan for a walkable mixed-use urban village.</li> <li>▪ 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.</li> <li>▪ The plan update also includes a more defined plan and timing for major investments in public facilities. These investments are likely to serve as a catalyst for development in the neighborhood and make progress towards achieving the vision.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Same as Alternative 2, except that greater infrastructure investment would be made to achieve the vision.</li> </ul>
Mitigation Measures	<p data-bbox="570 1619 846 1654"><b>Incorporated Plan Features</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p data-bbox="570 1759 992 1787"><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
<p><b>Other Potential Mitigation Measures</b></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>			
<p><b>Public Services, Capital Facilities, and Utilities</b></p>			
<p>Impacts Common to All Alternatives</p>	<p><b>City Facilities</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Law Enforcement</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Fire and Emergency Medical Services</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Libraries</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Schools</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Sewer</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Water</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Stormwater</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul>		



Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<p><b>Utilities – Power and Telecommunication</b></p> <ul style="list-style-type: none"> <li>Population growth under any of the alternatives will result in increased demand for utility services.</li> </ul>		
<p>Impacts of Each Alternative</p>	<ul style="list-style-type: none"> <li>Population growth under Alternative 1 would result in demand for 14 additional police officers.</li> <li>Population growth in the plan area under Alternative 1 is projected to result in 1,345 new students.</li> <li>Population growth under Alternative 1 is projected to lead to a wastewater capacity deficit of 1.54 million gallons per day in 2035.</li> </ul>	<ul style="list-style-type: none"> <li>Population growth under Alternative 2 would result in demand for 15 additional police officers.</li> <li>Population growth in the plan area under Alternative 1 is projected to result in 1,469 new students.</li> <li>Population growth under Alternative 1 is projected to lead to a wastewater capacity deficit of 1.57 million gallons per day in 2035.</li> </ul>	<ul style="list-style-type: none"> <li>Population growth under Alternative 3 would result in demand for 15 additional police officers.</li> <li>Population growth in the plan area under Alternative 1 is projected to result in 1,477 new students.</li> <li>Population growth under Alternative 1 is projected to lead to a wastewater capacity deficit of 1.55 million gallons per day in 2035.</li> </ul>
<p>East Sumner Neighborhood</p>	<ul style="list-style-type: none"> <li>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 in Chapter 3 <a href="#">of the DSEIS</a>.</li> <li>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.</li> <li>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.</li> </ul>		
<p>Mitigation Measures</p>	<p><b>Incorporated Plan Features</b></p> <p>City Facilities:</p> <ul style="list-style-type: none"> <li>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.</li> <li>Under Alternatives 2 and 3 the City is preparing an updated Capital Facilities Plan.</li> </ul> <p>Law Enforcement:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> <p>Fire and Emergency Medical Services:</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"> <li>▪ 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&amp;R.</li> </ul> <p>Libraries:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p>Schools:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p>Sewer:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p>Water:</p> <ul style="list-style-type: none"> <li>▪ The City’s Capital Facilities Element contains goals and policies regarding water systems, which would be updated under action alternatives.</li> </ul> <p>Stormwater:</p> <ul style="list-style-type: none"> <li>▪ All alternatives retain buffers along rivers, streams, and wetlands.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p>Solid Waste:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p>Utilities:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p><b>Applicable Regulations and Commitments</b></p> <p>Law Enforcement:</p> <ul style="list-style-type: none"> <li>▪ The Sumner Police department enforces various regulations of the City such as Title 9 Criminal Code, Title 10, Vehicles and Traffic</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<p>Fire and Emergency Medical Services:</p> <ul style="list-style-type: none"> <li>▪ EPF&amp;R has adopted response time objectives and prepares regular reports.</li> <li>▪ The City and EPF&amp;R will continue to work with mutual aid partners for backup response to emergency incidents.</li> <li>▪ All new development is required to meet City development regulations as well as the International Building Code and International Fire Code.</li> <li>▪ National and state industry standards address fire district response times and staffing minimums (Fire Protection Association Standard 1710 and State’s Labor &amp; Industries safety requirements (WAC 296-305-05001).</li> </ul> <p>Libraries:</p> <ul style="list-style-type: none"> <li>▪ <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.</li> </ul> <p>Sewer:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ The City manages its sewer system under Sumner Municipal Code Title 13, Public Services.</li> </ul> <p>Schools:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> </ul> <p>Water:</p> <ul style="list-style-type: none"> <li>▪ The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years.</li> <li>▪ Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater.</li> <li>▪ The City has adopted the <i>2009 Water System Plan Update</i> and <i>2010 Water System Plan Revisions</i>.</li> <li>▪ Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls.</li> </ul> <p>Stormwater:</p> <ul style="list-style-type: none"> <li>▪ The City has adopted stormwater standards requiring, among other things, 25-year storage with the 2-year predevelopment release rate.</li> <li>▪ 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.</li> <li>▪ The City should implement the capital improvement projects described in the 2011 Stormwater Comprehensive Plan.</li> <li>▪ The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program.</li> </ul>		

### Other Potential Mitigation Measures

#### City Facilities:

- 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.

#### Fire and Emergency Medical Services:

- 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.

#### Schools:

- 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.

#### Sewer:

- The City could identify additional improvements for the 20-year planning period to address deficiencies projected in the long-term.

#### Water:

- 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.

#### Stormwater:

- 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.

#### Utilities:

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>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.</li> <li>The City could coordinate and cooperate with other jurisdictions in the implementation of multi-jurisdictional electric utility facility additions and improvements.</li> </ul>		
<b>Parks and Recreation</b>			
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"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Under the Assertive Collaborative Action Alternative, the City would have a slightly higher deficit of park and recreation facilities than the other Alternatives.</li> </ul>
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>Growth in East Sumner to implement the City’s vision for an urban village will increase the demand for neighborhood park facilities and amenities.</li> </ul>	<ul style="list-style-type: none"> <li>Growth in East Sumner to implement the City’s vision for an urban village will increase the demand for neighborhood park facilities and amenities.</li> </ul>	<ul style="list-style-type: none"> <li>The demand for park resources in the East Sumner neighborhood will increase as development occurs. However, under Alternative 3, new open space and trail amenities are planned.</li> </ul>
Mitigation Measures	<p><b>Incorporated Plan Features</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Applicable Regulations and Commitments</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Other Potential Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>		

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
	<ul style="list-style-type: none"> <li>▪ The City could pursue more aggressive grant and bond financing for parks and trails projects.</li> </ul>		
<b>Transportation</b>			
Impacts Common to All Alternatives	<ul style="list-style-type: none"> <li>▪ Traffic volumes increase over time under all alternatives.</li> <li>▪ The three land use alternatives have relatively limited impacts on the adjacent state highways serving Sumner.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ The 64th Street E and SR 410 interchange with Sumner-Tapps Highway would have LOS F operations under all alternatives.</li> <li>▪ 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.</li> <li>▪ 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"> <li>○ Main Street/160th Avenue E – Install traffic signal, when warranted.</li> <li>○ 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.</li> <li>○ 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 signaling Main Street (60th Street E)/160th Avenue E.</li> </ul> </li> </ul>		
Impacts of Each Alternative	<ul style="list-style-type: none"> <li>▪ PM peak hour trips would equal 18,300 under the No Action Alternative.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Along 24th Street E impacts are similar to Alternative 2.</li> </ul>

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
		<ul style="list-style-type: none"> <li>▪ Along 24th Street E increases in traffic volumes with the degrade intersection operations as compared to the No Action (Alternative 1).</li> <li>▪ 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).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Impacts to volumes and LOS along Elm Street/East Valley Highway between Valley Avenue and Puyallup Street are similar to Alternative 2.</li> </ul>
East Sumner Neighborhood	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>

Element of Analysis	Alternative 1. No Action Alternative	Alternative 2. Minimal Zoning Alternative	Alternative 3. Assertive Collaborative Action
Mitigation Measures	<p data-bbox="578 304 833 331"><b>Incorporated Plan Features</b></p> <ul data-bbox="578 342 1463 793" style="list-style-type: none"> <li data-bbox="578 342 1446 447">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.</li> <li data-bbox="578 468 1377 520">Alternatives 2 and 3 include transportation improvements in the East Sumner Neighborhood.</li> <li data-bbox="578 531 1463 636">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.</li> <li data-bbox="578 657 1446 793">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.</li> </ul> <p data-bbox="578 825 971 852"><b>Applicable Regulations and Commitments</b></p> <ul data-bbox="578 863 1474 1115" style="list-style-type: none"> <li data-bbox="578 863 1474 936">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.</li> <li data-bbox="578 957 1463 1010">The City implements Chapter 16.06 Commute Trip Reduction. The Transportation Plan Update will expand on Transportation Demand Management Measures.</li> <li data-bbox="578 1031 1446 1083">The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places.</li> <li data-bbox="578 1094 1203 1115">The City collects mitigation fees for trails (see Section 3.10).</li> </ul> <p data-bbox="578 1146 914 1173"><b>Other Potential Mitigation Measures</b></p> <ul data-bbox="578 1184 1446 1289" style="list-style-type: none"> <li data-bbox="578 1184 1446 1289">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.</li> </ul>		

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.

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- 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 PLANNING COMMISSION PREFERRED ALTERNATIVE DESCRIPTION

### 2.1 Planning Commission Preferred Alternative Description

The City of Sumner has selected a Preferred Alternative that is within the range of alternatives analyzed in the Draft SEIS both city-wide and in the East Sumner Neighborhood.

#### City-wide

The preferred alternative is Alternative 3 with the following amendments:

- Alternative 3 City-wide (outside of the East Sumner Neighborhood) with the following amendments:
  - Update 2040 Vision Statement
  - Add policy language on greenhouse gas emissions and energy use in the Environment and Transportation Elements
  - Add adopted LOS for SR 410 and SR 162 to the Transportation Element
  - Add 20-year project list the Transportation Plan
  - Add a multi-modal LOS to the Transportation Plan
  - Add policy language on disaster prevention and recovery strategies to the Transportation Element
  - Add policy language to the Housing Element to develop a housing strategy by 2017
  - Add policy language in the Housing Element establishing a minimum density in the MUD Zone of 15 du/acre
  - Add sub-policy in the Environment Element to require trees or other vegetated barriers to buffer vulnerable populations from busy roadways
  - Add policy language in support of partnerships to address biodiversity
  - Amend policy language in support of biodiversity including in the vision and values statements
  - Amend the Neighborhood Commercial and East Sumner Urban Village Overlay standards to allow for cottage housing and zero lot line housing
  - Add policy language to the Plan and Monitoring sub-element clarifying that the Comprehensive Plan shall be updated based on the 8-year periodic review requirement per GMA

Other options being considered that are not included in the Planning Commission's Preferred Alternative:

- Rezone 100 Acres of City owned property from "Agriculture" to "Resource Protection". Resource Protection provides for similar land uses, including agriculture, as the proposed "Residential Protection" zoning analyzed in the DSEIS.

Exhibit 2-1 provides a comparison of the 3 alternatives analyzed in the DSEIS and the Planning Commission Preferred Alternative.

**Exhibit 2-1. Comparison of Alternatives**

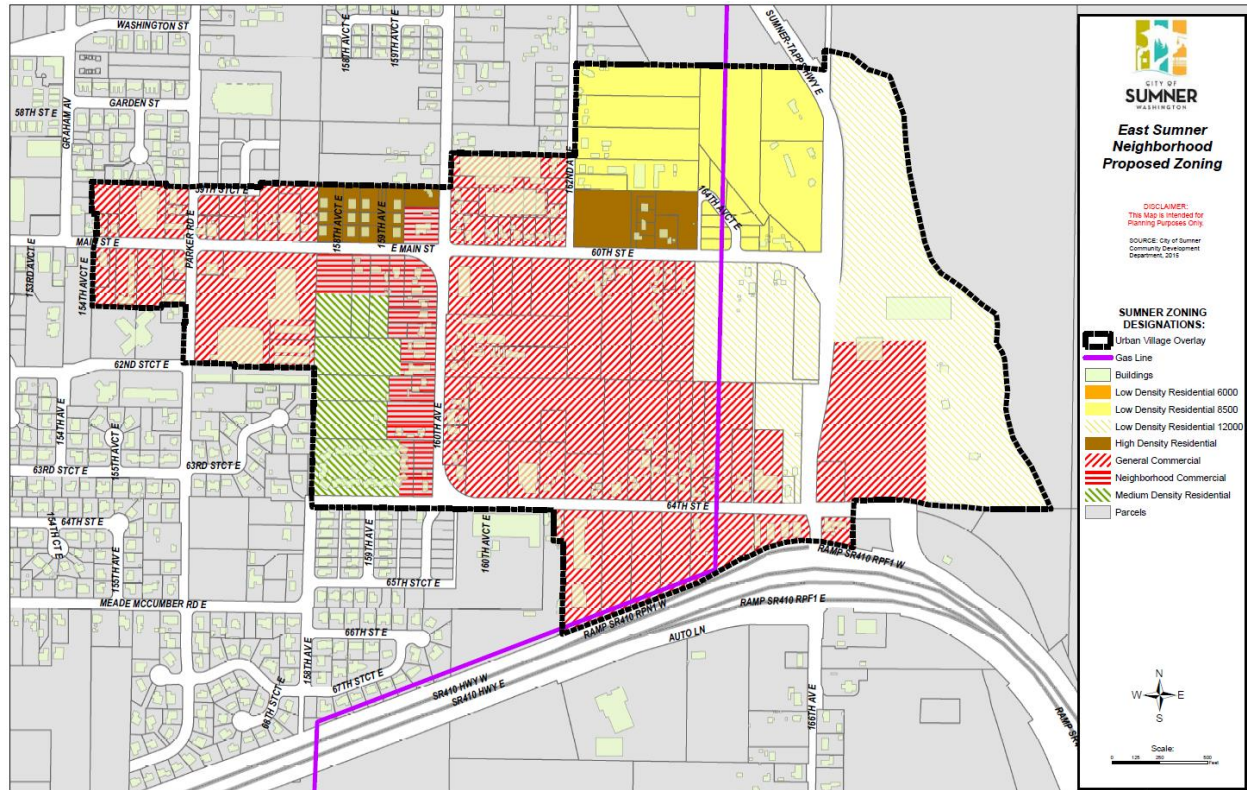
<b>Feature</b>	<b>Alt 1: No Action</b>	<b>Alt 2: Minimal Zoning</b>	<b>Alt 3: Assertive Collaborative</b>	<b>Preferred Alternative</b>
Land Area (Acres)	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931	City limits: 4,846 UGA: 931
Population Capacity (Persons)	13,184	13,547	13,610	13,476
Housing Capacity (Dwelling Units)	5,988	6,155	6,183	6,122
Employment Capacity (Jobs)	21,909	21,909	22,262	22,210
Comprehensive Plan Amendments	None	Medium Density Residential to M-1 along East Valley Highway Update Comp Plan Elements to address 2010-35 growth, housekeeping items, and for consistency Updated East Sumner Neighborhood Plan	Same as Alternative 2  Same as Alternative 2  Same as Alternative 2	Same As Alternatives 2 + 3  Same As Alternatives 2 + 3  Same As Alternatives 2 + 3
Development Regulation Amendments	None	Critical Areas, Downtown Building Heights, Parking, and eliminating Condo Requirements, Implement Sumner Meadows Zoning Changes, Subdivision Regulations, Concurrency Requirements	Same as Alternative 2	Similar to Alternatives 2 + 3 with changes as noted in the Preferred Alternative summary
Zoning Changes	None	Upzone to allow for mixed-use development, multi-family residential, and local and regional retail	Same as Alternative 2	Similar to Alternatives 2 and 3, but capacity for housing and jobs is between Alternatives 2 + 3
Public Improvements	None	Improvements to Main Street	New Street Improvements, Off-site Wetland Mitigation Bank, Open Space, Trails	Same As Alternative 3

Source: BERK, 2015

### East Sumner Neighborhood

The preferred alternative in East Sumner is generally consistent with Alternative 3, but includes amendments to the proposed zoning map as shown in Exhibit 2-3 that results in reductions in housing and employment capacity.

Exhibit 2-2. East Sumner Preferred Alternative Zoning Map



Source: City of Sumner, 2015

The following is a summary of the preferred alternative in East Sumner:

- East Sumner Preferred Alternative, including:
  - Public improvements consistent with Alternative 3
    - New and existing street improvements
    - Off-site wetland mitigation bank
  - Revised Zoning Designations:
    - Increase General Commercial (GC) Zoning by 46 acres
    - Reduce Neighborhood Commercial (NC) Zoning by 56 acres
    - Reduce High Density Residential (HDR) Zoning by 4 acres
    - Add 11 acres of Medium Residential (MDR) Zoning
    - Increase Low Density Residential 12000 (LDR-12) Zoning by 5 acres
    - Increase Low Density Residential 8500 (LDR-8.5) Zoning by 2 acres
  - Assumption of 100% commercial development south of the proposed 62<sup>nd</sup> Street SE
  - The following housing and employment capacity in East Sumner, which is within the range of the alternatives analyzed in the DSEIS:
    - Housing Capacity of 439 units
    - Employment Capacity of 529 jobs

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- Planned Action Ordinance based on the Preferred Alternative

The increase in General Commercial Zoning is similar to the Urban Village Overlay and zoning designations analyzed in the DSEIS including the overall potential for commercial, mixed-use, and single family residential development in the neighborhood. However, there is a greater focus on commercial and residential development in certain areas of the neighborhood as shown on Exhibit 2-2.

**Exhibit 2-3. Comparison of Zoning by Alternative in East Sumner**

Zoning Districts	Acreage		
	No Action	Alts 2 and 3	Preferred
General Commercial (GC)	59	44	89
Neighborhood Commercial (NC)	17	0	8
Medium Density Residential	9	12	11
High Density Residential	0	0	8
Low Density Residential 12000	25	32	36
Low Density Residential 8500	27	23	23
Low Density Residential 6000	19	0	0
Low Density Residential 4000	18	0	0
Urban Village (New)	0	64	0
<b>Total*:</b>	<b>174</b>	<b>175</b>	<b>175</b>
Wetlands	14	2	2
*Difference due to rounding			

Source: City of Sumner, 2015; BERK, 2015

**Exhibit 2-4. Development Capacity by Alternative in East Sumner**

Scenarios	East Sumner Neighborhood	
	New Housing	New Employment
Alternative 1: No Action Alternative	246	418
Alternative 2: Minimal Zoning Action	355	418
Alternative 3: Assertive Collaborative Action	500	581
Preferred Alternative	439	529

Source: MAKERS 2015; BERK 2015

## 3.0 CLARIFICATION AND CORRECTIONS

This Chapter provides clarifications and corrections to the Draft Supplemental Environmental Impact Statement (Draft SEIS) due to responses to comments or due to review by City staff or consultants. Changes are noted in the order of the Draft SEIS Chapter and subsections. Insertions are noted as underlined text and deletions are noted with stricken text. Amendments to Chapter 1 of the DSEIS are shown in Chapter 1 of the FSEIS. No amendments have been made to Chapter 2 of the DSEIS.

### Chapter 3: Affected Environment, Significant Impacts, and Mitigation Measures

#### Water Resources

Amend the reference to the version of the adopted Stormwater Manual for Western Washington on page 3-23 of the Draft SEIS as follows:

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...”

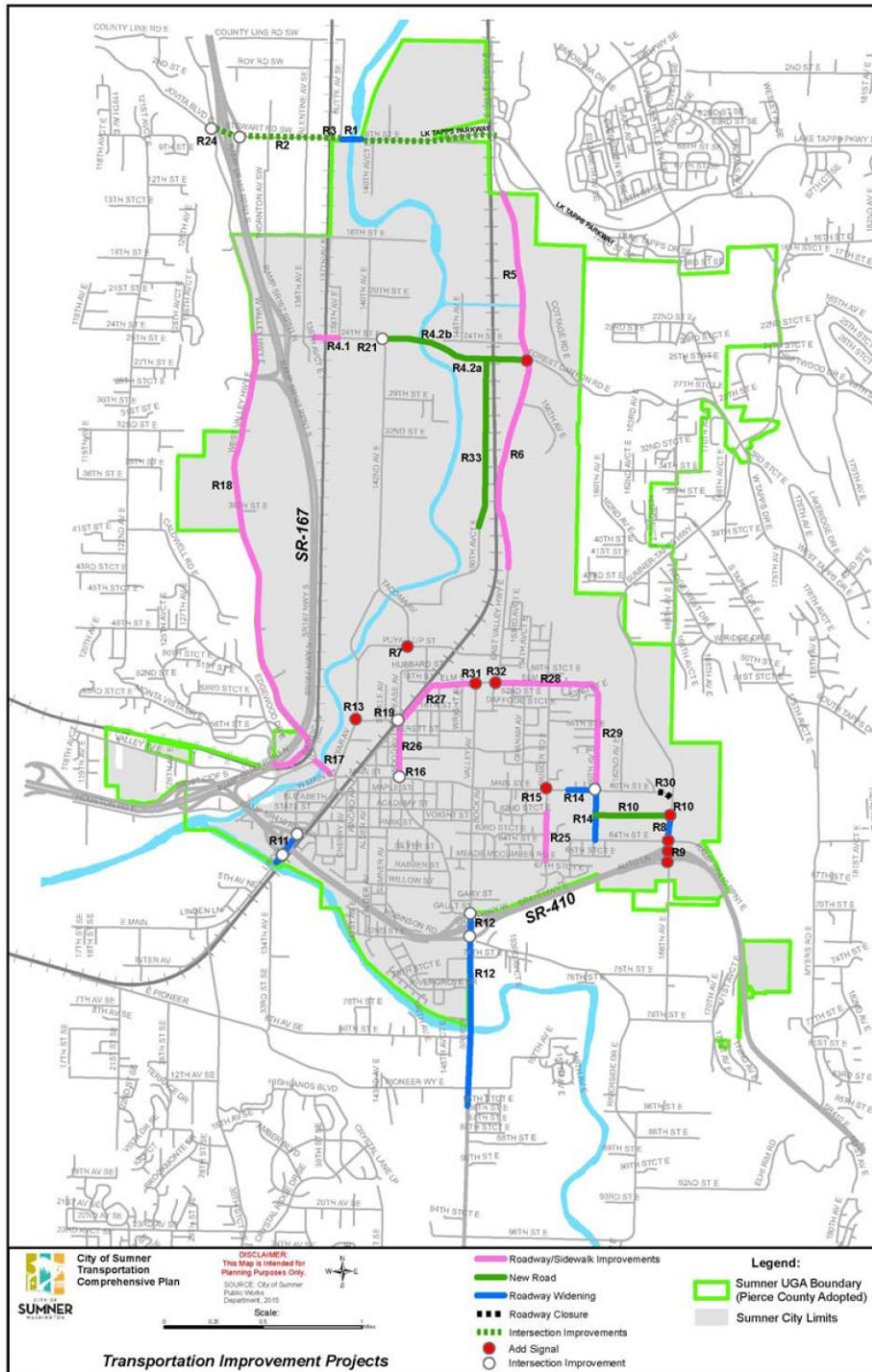
These regulations also adopt use of the:

- [2012-2005](#) 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

#### Transportation

In response to a comment Exhibit 3-105: Transportation Improvement Projects on page 3-190 of the Draft SEIS has been updated to reflect the most current state and local projects as shown below. A previous version of this map was also provided in the Draft Transportation Plan in Volume I of the DSEIS.

Exhibit 3-1. Transportation Improvement Projects

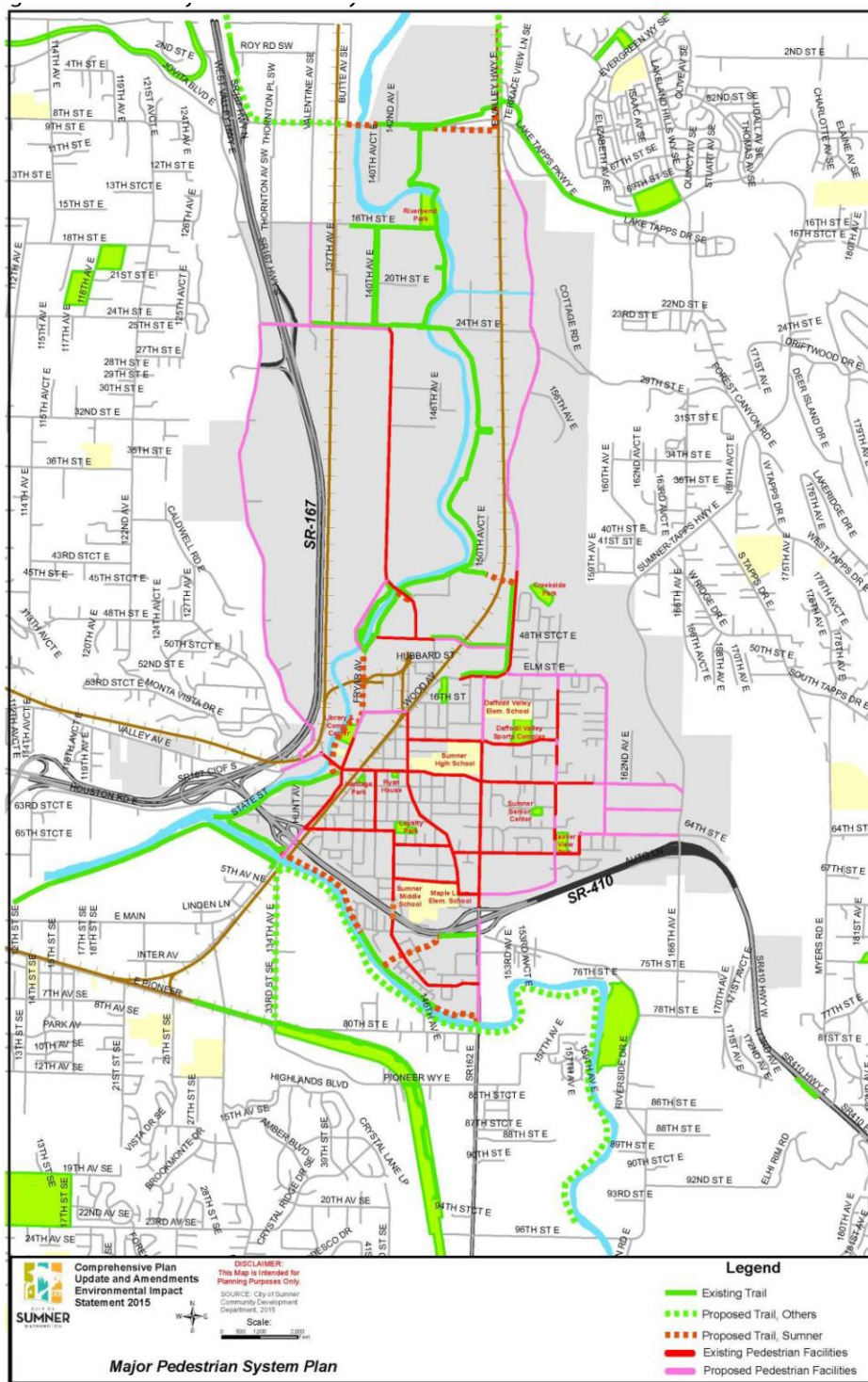


Source: City of Sumner, 2015

In response to a comment Exhibit 3-106: Major Pedestrian System Plan on page 3-192 of the Draft SEIS has been updated to show the pedestrian overcrossing across SR 410.



Exhibit 3-2. Major Pedestrian System Plan



Source: City of Sumner, 2015

The Level of Service (LOS) summary table is provided in Appendix D of the Final SEIS. The LOS summary table was provided in Volume I of the Draft SEIS.

## 4.0 RESPONSE TO COMMENTS

### 4.1 Introduction

This chapter of the Final Supplemental Environmental Impact Statement (Final SEIS) contains the written and verbal comments provided on the Draft Supplemental Environmental Impact Statement (Draft SEIS) during the comment period February 24 to April 24, 2015. Written comments during the 60-day comment period and verbal comments received at the Planning Commission public hearings on March 19, 2015 and April 2, 2015 are included. Responses to these comments are also included in this chapter.

### 4.2 Public Comments

During the 60-day comment period, 49 public comments were received, including written letters and verbal comments from public hearings and meetings. A list of the commenters is provided in Exhibit 4-1 with agencies first followed by community organizations and individuals.

**Exhibit 4-1. Public Comments Received During Public Comment Period**

Letter/ Speaker Number	Author/ Speaker	Date
<b>Federal Tribes</b>		
1	Muckleshoot Indian Tribe Fisheries Division	April 24, 2015
2	Puyallup Tribe of Indians	April 21, 2015
<b>State Agencies</b>		
3	State of Washington – Department of Fish and Wildlife	April 6, 2015
4	State of Washington – Department of Transportation	April 24, 2015
4A	State of Washington – Department of Commerce	April 21, 2015
<b>Regional and Local Agencies</b>		
5	Puget Sound Regional Council	April 16, 2015
6	Pierce County – Public Works and Utilities	April 9, 2015
7	Tacoma- Pierce County Health Department – Amy Pow	April 15, 2015
8	Tacoma-Pierce County Health Department – Anthony L-T Chen	April 20, 2015
<b>Community Organizations</b>		
9	League of Women Voters – Paula Eismann	April 2, 2015
10	Master Builders Association of Pierce County – Jeremiah Lafranca	April 2, 2015
11	NatureMapping Foundation – Karen Dvornich	April 2, 2015

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<b>Letter/ Speaker Number</b>	<b>Author/ Speaker</b>	<b>Date</b>
12	Pierce County Biodiversity Alliance (PCBA) – Linda T. Burgess	April 20, 2015
13	Pierce County Biodiversity Alliance (PCBA) – Linda Burgess	April 24, 2015
14	Puyallup River Watershed Council - Kurt Fremont	April 2, 2015
15	Sumner School District – Joannie Hill	April 22, 2015
16	Tahoma Audubon Society – Krystal Kyer	April 2, 2015
16A	American Rivers	March 24, 2015
<b>Written Letters: Public and Property Owners</b>		
17	Belcher, Albert and Louise	March 19, 2015
18	DeGoede Brothers, LLC	March 19, 2015
19	Francher, Jeanne	No date
20	Herbert, Mike R.	April 23, 2015
21	Holm, Pam	June 26, 2014
22	Shannon & Keith Properties, LLC	April 15, 2015
23	VSI Law Group PLLC on behalf of Bechtold, John and Jackee	March 19, 2015
<b>Public Meetings</b>		
24	Anonymous Comment Form	February 26, 2015
25	Anonymous Comment Form	March 13, 2015
<b>Planning Commission Public Hearing – March 19, 2015</b>		
26	Mark Nelson	March 19, 2015
27	Greg Amann	March 19, 2015
28	John Huntsman	March 19, 2015
29	Myra Vernon	March 19, 2015
30	Mike Kersey	March 19, 2015
31	Jeanne Fancher	March 19, 2015
32	Tia Ball	March 19, 2015
33	John Huntsman	March 19, 2015
34	George Josten	March 19, 2015
35	Robin Machofsky	March 19, 2015
36	Tia Ball	March 19, 2015
37	Jeanne Fancher	March 19, 2015
38	Linda Burgess	March 19, 2015

Letter/ Speaker Number	Author/ Speaker	Date
39	Jeanne Fancher	March 19, 2015
Planning Commission Hearing – April 2, 2015		
42	Linda Burgess	April 2, 2015
43	Jerry Broadus	April 2, 2015
44	Jeanne Fancher	April 2, 2015
45	Linda Burgess	April 2, 2015
46	Randall Adams	April 2, 2015
47	Jeanne Fancher	April 2, 2015

### 4.3 Responses to Comments

Responses to letter comments are provided in Exhibit 4-2. At the end of this Chapter, copies of the letters are provided; distinct comments are numbered in the margins with responses corresponding to the numbered comment. Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted and forwarded to the appropriate decision maker(s). Comments that ask questions, request clarifications or corrections, or are related to the Draft SEIS analysis are provided a response that explains the SEIS approach, offers corrections, or provides other appropriate replies.

**Exhibit 4-2. Table of Responses to Public Comments**

Comment Number	Response
Federal Tribes	
1. Muckleshoot Tribe Indian Tribe Fisheries Division	
1-1	The policy proposals are noted and forwarded to City decision makers. Please note that the City has proposed a zero rise floodplain policy and has proposed amendments to its critical areas regulations based on a best available science review; see Section 5 of the study by Grette Associates LLC February 2015, which suggests an update of map references and code provisions.  The City has previously studied development and flooding in the White River floodplain and considered bridge and habitat proposals and effects on plants and animals and water resources; see the City of Sumner 2013 Comprehensive Plan Annual Amendments, Sumner Meadows Docket, Final SEIS, July 2014.
1-2	Future development would need to address mitigation sequencing including avoiding, minimizing and mitigating. The use of a wetland mitigation bank to create higher functioning wetlands in place of lower functioning wetlands where impacts cannot be avoided or minimized is an option for consideration to protect wetlands within Sumner.
1-3	See Response 1-1.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
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<b>Comment Number</b>	<b>Response</b>
1-4	The Comprehensive Plan and East Sumner neighborhood plan are legislative policy proposals, and a wetland mitigation bank feasibility study is an implementation action and not required prior to considering broad growth and policy actions. The land use and zoning options in East Sumner consider a range of growth and infrastructure options. For example, Alternative 2 does not assume a road proposal mid-block whereas Alternative 3 does.
1-5	<p>According to WAC 222-16-030: “Until the fish habitat water type maps described below are adopted by the board, the Interim Water Typing System established in WAC 222-16-031 will continue to be used.”</p> <p>Please note that although the Forest Practices board has not fully implemented WAC 222-16-030, local jurisdictions are free to implement WAC 222-16-030. These state regulations were developed with peer review and comment.</p>
1-6	The National Marine Fisheries Service (NMFS) indicated that the SR 167 Biological Opinion should not be used when considering floodplain issues per their letter to the City of Sumner. Therefore, the 2008 NMFS Biological Opinion should be used as a requirement for the White River since it takes into account White River Spring Chinook. Text regarding the use of the SR 167 Biological Opinion will be updated to reflect the use of the 2008 NMFS Biological Opinion.
1-7	Alternative 2 (Minimal Zoning) does not establish M-1 zoning along Stewart Road. The rezone from General Commercial (GC) to M-1 was a docket item for the 2013 Comprehensive Plan Amendments and was approved per Ordinance No. 2494 on 9/15/2014. A separate Supplemental EIS was prepared for the 2013 amendments; see the City of Sumner 2013 Comprehensive Plan Annual Amendments, Sumner Meadows Docket, Final SEIS, July 2014. The commenter received notices of that 2014 SEIS, provided comments, and responses were made in the Final SEIS.
1-8	Alternative 2 (Minimal Zoning) as described on page 2.14 of the Draft SEIS does include the MIC overlay zoning change for the Sumner Meadows Golf Course. The City does not have an “Open Space” land use designation for the Comprehensive Plan.
1-9	<p>Alternative 3 does include the MIC overlay zoning action described above and can be found on page 2-19 of the Draft SEIS. Alternative 3 also considers the rezone of the City’s AG zoned property to Residential Protection to streamline the City’s zoning code and in recognition that the City does not have resource lands of long-term commercial significance as described in the Draft SEIS plans and policies discussion in Section 3.8. However, recognizing the sensitive nature of the site, the City was proposing a zone that has protective standards. The AG and Residential Protection Zones have similar zoning use allowances and development standards such as very low densities. The City has no proposed changes to its ownership of the site. The City may consider changing the name of the AG zone to Resource Protection; in the future the City may consider appropriate mapping of Residential Protection areas beyond the area it is currently applied near East Sumner, which is on a steep slope area where mining occurs.</p> <p>The City’s critical areas ordinance already allows for off-site wetland mitigation in SMC 16.46.170.M in any location in the city limits. The City commissioned a study showing habitat enhancement was feasible on the site: Parametrix, 24th Street East Setback Levee Feasibility Study, June 2011.</p>
1-10	Parks and the creation of forested wetlands or non-forested wetlands are not mutually exclusive, but rather depend on the design of the park and planned activities.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS**

<b>Comment Number</b>	<b>Response</b>
1-11	See Response 1-1. The 2008 NMFS Biological Opinion should be used as guidance on floodplain issues where the SR 167 Biological Opinion was previously used as per the NMFS letters to Sumner. Compliance with the 2008 Biological Opinion is fully addressed during project level review and consultation including mitigation sequencing.
1-12	See response 1-9. A wetland mitigation bank would serve as active flood plain and provide salmon habitat. See response 1-4 regarding feasibility studies. Any off-site wetland mitigation will be subject to site-specific environmental review and analysis.
1-13	See Response 1-1. Habitat restoration is mentioned as a part of the floodplain enhancement. As with all projects it would need to go through the required review and permitting processes. This would ensure that the design of the project is sound, and that it would not harm any ESA listed species including salmon and their habitat.
1-14	See responses 1-1 and 1-9. The wetland mitigation bank is not mutually exclusive of the other projects mentioned, but may be developed in harmony with the City’s goals and objectives for the referenced projects. Future projects along the White River will be subject to project level environmental review as appropriate under local, state and federal rules.
1-15	The City acknowledges that the 2009 water system plan identified a potential shortfall in 2029 maximum daily demand. However, the 2009 plan continues on to state that “through a series of planned source improvements, new interties, new source construction and water right transfers, the shortfall would be filled and a surplus created.” The City has applied for water rights for a new central well since the time of the water system plan and anticipates obtaining those in 2016. 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. See Draft SEIS section 3.9 Public Services, Capital Facilities and Utilities.
1-16	The channel migration zone will be added to the map if it is found to differ substantially from the overlays currently shown on the map.
1-17	See Responses 1-1 and 1-9. As stated on page 3-10 of the Draft SEIS: “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.” Current project review processes comply with the reasonable and prudent alternatives (RPAs) included in the 2008 NMFS Biological Opinion by “Allow[ing] development to proceed only if ecological functions of the floodplain are preserved or compensated (i.e. mitigated)”.
1-18	See Responses 1-1 and 1-9. The City responded to comments on the referenced memo from the Tribe in the City of Sumner 2013 Comprehensive Plan Annual Amendments, Sumner Meadows Docket, Final SEIS, July 2014. The MIC proposal in Alternatives 2 and 3 do not fundamentally change underlying zoning allowances for light industrial use already analyzed in 2014.
1-19	The City studied floodplain fill, a new zero rise policy, and responded to comments from the Tribe in the City of Sumner 2013 Comprehensive Plan Annual Amendments, Sumner Meadows Docket, Final SEIS, July 2014. The MIC proposal in Alternatives 2 and 3 do not fundamentally change underlying zoning allowances for light industrial use already analyzed in 2014.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
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<b>Comment Number</b>	<b>Response</b>
1-20	The 2007 Wetlands Map shows two areas that do not show up on Exhibit 3-6; 1) a wetland that is a stormwater pond and is located between 16th Street and 24th Street on the right bank of the White River; 2) a farm drainage ditch located in the agriculture land south of 24th Street east of the White River and west of the railroad. Neither stormwater ponds nor ditches are regulated as wetlands and therefore are not shown on the map.
1-21	See Response 1-9.
1-22	These projects are listed under the heading “Additional Mitigation Measures”. These are “proposed conceptual restoration locations” and are areas of opportunity for mitigation for Plants and Animals.
1-23	Only major, regulated waterbodies are described in this section.
1-24	The updates and proposed amendments to the Critical Areas Regulations and Best Available Science (BAS) report can be found in Volume 1 of the 2015 Comprehensive Plan Update documents, which were made available at the same time as the Draft SEIS.
1-25	The City currently owns nearly 100 acres of land currently zoned AG and would retain ownership if the property were rezoned to Residential Protection. The City has also required easements and buffers along the river. The prior studied habitat enhancement proposals on the City owned land are still feasible (Parametrix 2011).
1-26	See Response 1-15.
1-27	The City of Sumner is currently using the Department of Ecology 2005 Stormwater Manual together with amendments. The City has until 2016 to adopt the most recent Ecology stormwater manual.
2-1	The comment is noted and forwarded to City decision makers.
2-2	The comment is noted and forwarded to City decision makers.
2-3	The comment is noted and forwarded to City decision makers.
2-4	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
<b>State Agencies</b>	
<b>2. State of Washington Department of Fish and Wildlife</b>	
3-1	The comment is noted and forwarded to City decision makers.
3-2	The comment is noted and forwarded to City decision makers.
3-3	The comment is noted and forwarded to City decision makers.
3-4	The comment is noted and forwarded to City decision makers.
3-5	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
3-6	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
3-7	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
3-8	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
3-9	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
3-10	The comment is noted and forwarded to City decision makers. See also responses to letter 12.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS**

<b>Comment Number</b>	<b>Response</b>
3-11	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
<b>3. State of Washington – Department of Transportation</b>	
4-1	The Transportation Plan and element have been updated for consistency.
4-2	Comment Noted. It is referencing all intersections.
4-3	Thank you for the comment. This is a plan that addresses Sumner’s desires and plans for the future and includes projects the City would like WSDOT to fund in the future, however far distant it may be.
4-4	The suggested language is proposed for addition to the plan in response to comments (Transportation Plan, page 7).
4-5	The City has been awarded safe routes to school grants and continues to apply for these and other sidewalk grant funding sources.
4-6	Comment noted. See response to 4-3.
4-7	The suggested revisions are proposed for addition to the plan in response to comments (Transportation Plan, page 11).
4-8	The hyperlink will be corrected in the final plan in response to comments.
4-9	Reference will be updated in the final plan in response to comments. (Transportation Plan, page 19)
4-10	The speed limits will be updated for consistency in the final plan in response to comments (Transportation Plan, Section 3).
4-11	The hyperlink will be corrected in the final plan in response to comments.
4-12	The suggested disclaimer will be added to the final plan in response to comments (Transportation Plan, page 53).
4-13	A correction will be made to fix “project” to “projected” in the final plan in response to comments (Transportation Plan, page 70).
4-14	The reference to the current WSDOT Highway Systems Plan will be updated in the final Transportation Plan. Details pertaining to improvements to 410 will be updated in the final plan to be consistent with WSDOT’s Highway Systems Plan.
4-15	The suggested language will be added to the final transportation plan in responses to comments.
4-16	The projects identified in this section of the Transportation Plan represent the current project list for the City. The plan will be updated to revise the SR 162 from SR 410 to Pioneer 4/5 lane project to a 3-lane strategy from SR 410 to 96th (southbound and northbound) as noted in the current Highway Systems Plan. This will be updated in the final Transportation Plan in responses to comments (Transportation Plan, page 87).
4-17	This table is for local streets and not for State Highways as is depicted in HCM 2010 Exhibit 15-3.
4-18	The Capital Facilities Plan will be updated to clarify the project scope as suggested.
4-19	The Capital Facilities Plan will be updated to clarify the project scope as suggested.



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<b>Comment Number</b>	<b>Response</b>
4-20	See response to 4-16.
4-21	To be updated based upon previous comments.
4-22	To be updated based upon previous comments.
4-23	To be updated based upon previous comments.
<b>4A. Department of Commerce</b>	
4A-1	The comment is noted and forwarded to City decision makers.
4A-2	The comment is noted and forwarded to City decision makers.
4A-3	The comment is noted and forwarded to City decision makers.
4A-4	The comment is noted and forwarded to City decision makers.
4A-5	<p>The Draft SEIS includes an inventory of affordable housing, identifies housing needs, and provides an analysis of the City’s fair share of housing per countywide planning policies. See Section 3.7.</p> <p>The Comprehensive Plan and SEIS are an integrated document under GMA and SEPA. Therefore, the information in the SEIS is considered part of the Comprehensive Plan. The housing information in the SEIS is consistent with the existing integrated Comprehensive Plan and EIS and reflects the countywide planning policies (with status updated in the buildable lands analysis) that established housing targets as well as VISION 2040 per PSRC. Section 2.3 in the SEIS includes a description of the integrated Comprehensive Plan and SEIS in accordance with GMA and SEPA.</p>
4A-6	See response to 1-15. The Draft SEIS compares each alternative and its 20-year growth numbers to the City’s water supply as estimated in 2009 and as updated due to the construction of the Central Well.
4A-7	The sewer analysis is based on the proposed zoning of each alternative; the zoning for each alternative is the basis for the 20-year growth projections and land capacity associated with each alternative. See Draft SEIS Exhibit 3-76. Projected 2035 Wastewater Flow by Alternative (Gallons per day).
4A-8	Staff will update capacity and add proposed facilities in the Comprehensive Plan Utilities Element. Power, gas, and telecommunication facilities are not a required part of the Capital Facilities Element; the City or other public agencies do not provide them in Sumner. See definitions of public services, urban services, and rural services in RCW 36.70A.030.
4A-9	The Draft SEIS considers the demand from future growth on East Pierce Fire and Rescue and its levels of service within the 20 year planning period. Staff is working with East Pierce Fire and Rescue to incorporate their plans by reference into the Comprehensive Plan.
4A-10	Please refer to Chapter 3, Section 3.9 of the Draft SEIS for the projection of increased school enrollment during the planning period, the impacts analysis, and mitigation measures that address revenue from impact fees.
4A-11	Staff is recommending the following amendment to Policy 1.4 of the Plan Monitoring and Amendment sub-element: “Review and revise the Comprehensive Plan on <u>an 8</u> year cycle <del>beginning with adoption</del> pursuant to the Growth Management Act.”

SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
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Comment Number	Response
4A-12	See response to comment 6-4.
4A-13	The comment is noted and forwarded to City decision makers.
4A-14	The comment is noted and forwarded to City decision makers. See response to comment 6-4.
4A-15	The comment is noted and forwarded to City decision makers.
4A-16	The comment is noted and forwarded to City decision makers. The finance section will be added to the final plan in response to comment.
4A-17	The comment is noted and forwarded to City decision makers. The reference to the fourteenth goal per the Shoreline Management Act will be added to the final plan in response to comment.

Regional and Local Agencies

5. Puget Sound Regional Council

5-1	The comment is noted and forwarded to City decision makers.
5-2	The comment is noted and forwarded to City decision makers.
5-3	The comment is noted and forwarded to City decision makers.
5-4	The comment is noted and forwarded to City decision makers.
5-5	The comment is noted and forwarded to City decision makers.
5-6	The comment is noted and forwarded to City decision makers.
5-7	The comment is noted and forwarded to City decision makers.
5-8	<p>The City will consider including a statement in the Comprehensive Plan Land Use Element. A proposed statement is shown below:</p> <p><i>The City of Sumner Comprehensive Plan promotes a sustainable growth pattern in support of VISION 2040 and Pierce County Countywide Planning Policies through its environmental policies promoting low impact development and critical areas protection, enhancement of parks and trails systems, multimodal travel and mixed use growth in the Town Center around the Sounder Station and in East Sumner along the East Main Street Corridor, fiscal and capital investment policies that promote growth concurrent with transportation, sewer and water infrastructure, compact residential neighborhoods in traditional grid patterns, and service as a regional family wage industrial hub for east Pierce County.</i></p>

SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS

Comment Number	Response
5-9	<p>Staff is recommend adding the following policies to the Plan:</p> <p>Sub-policy 1.1.6 to the Environment Element: “Conduct a greenhouse gas emission analysis on alternatives for major updates to the comprehensive plan.”</p> <p>Policy 6.7 to the Transportation Element:</p> <p style="padding-left: 40px;"><i>Transportation Energy Conservation: Reduce the rate of energy use per capita, both in building use and in transportation activities.</i></p> <p>Policy 6.8 to the Transportation Element:</p> <p style="padding-left: 40px;"><i>Transportation Greenhouse Gas Alternatives: Reduce greenhouse gases by expanding the use of conservation and alternative energy sources and by reducing vehicle miles traveled by increasing alternatives to driving alone.</i></p>
5-10	<p>Comment noted. See Section 4.2 (Pg. 45) of the Capital Facilities Plan for information on consistency between land use, transportation, and capital facilities plans. The Draft SEIS also addresses the demand for facilities over the 20-year period based on a common set of growth assumptions for the alternatives; see Section 3.9.</p>
5-11	<p>Alternative 1 is the No Action Alternative and is based on maintaining current policies and regulations. The preferred alternative must be within the range of alternatives analyzed and must demonstrate sufficient land capacity to accommodate the growth targets. Alternative 1 has sufficient capacity to accommodate growth targets for population and employment, with a small deficit in housing capacity of 105 units.</p>
5-12	<p>The employment target for 2035 is based on the PRSC Land Use Targets worksheet projecting a 2035 job total of 21,762. The total employment capacity for Alternatives 2 and 3 of 21,909 and 22,262 respectively is consistent with the employment allocation of 21,762. The Land capacity for employment in Sumner is based primarily on land inside the City limits as only limited employment capacity exists in the UGA outside the City limits and the proposal does not include any modification to the UGA boundary. Therefore, employment capacity is not an issue with respect to sizing the UGA, which is primarily a Pierce County role.</p>
5-13	<p>The LOS adopted for SR 410 and SR 162 will be added to the final transportation element in response to comments.</p>
5-14	<p>The Transportation Plan will be updated to add the 20-year project list (Transportation Plan, pages 91-92) in response to comments.</p>
5-15	<p>Staff reviewed the 2010 Highway Capacity Manual and the current Sumner Code. The code requires pedestrian and bike facilities as part of the Public Works standards. Therefore, staff added language to support these standards to include a pass/fail (exist/not exist) LOS. With regards to transit, staff included language to address the City’s current LOS for transit, routes and the regional provider. Staff also noted there is a lack of local transit service.</p> <p>The following text will be added to the Transportation Plan: Given that Sumner does not have the population to justify the need for a pedestrian capacity analysis for sidewalks, the LOS standards for sidewalks for the City of Sumner will be determined based upon existence (pass) or non-existence (fail) standard. In areas of high pedestrian activity (Sounder Station) the pedestrians are found to disperse onto multiple existing pedestrian facilities and do not create capacity issues in the network. When development occurs it will be required along their frontage to provide a passing LOS for pedestrians. Sumner will continue to analyze potential pedestrian connections and provide connections as part of our transportation improvement projects” (Transportation Plan, page 106).</p>

SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
 RESPONSE TO COMMENTS

Comment Number	Response
5-16	Staff is recommending the following policy be added to the Transportation Element: “Protect the transportation system against disaster, develop prevention and recovery strategies, and plan for coordinated responses.” This will be added as Policy 6.6 in the Transportation Element (Transportation Plan, page 21; Transportation Element, page 99).
5-17	A response is under preparation.
5-18	The Draft SEIS includes an inventory of affordable housing and an analysis of the City’s fair share of housing per countywide planning policies. See Section 3.7. Policy 2.1 and sub-policy 2.1.1 already provides a general outline for a housing strategy. Staff recommends additional language as follows: “Develop a housing strategy to implement fair share objectives. It shall include <u>an inventory of affordable housing, an analysis of Sumner’s fair share as compared to surrounding cities, and a phased approach to meet the community’s fair share housing allocation. Milestone dates and interim objectives shall be established to allow for progress in meeting the overall fair share targets. <u>The housing strategy should be completed by December 2017.</u>”</u>
5-19	Policy 2.3.3 lists a number of tools for promoting affordable housing. A minimum density has been established for the MUD zone of 15 du/acre.
6. Pierce County – Public Works and Utilities	
6-1	No changes to the permitted residential density is proposed. The existing Agricultural District (AG) and the proposed Residential-Protection District (RP) have the same allowable residential density of 1 unit per 20 acres. Furthermore, the property that is subject to the rezone in PLN2015-0007 is entirely owned by the City of Sumner and will not be developed for housing.
6-2	Comment noted. This is considered and addressed in the stormwater management section of the East Sumner neighborhood plan.
6-3	Comment noted. Upstream and cross stream properties will be included in considerations regarding future development that would alter flood elevations, and require flood storage mitigation.

SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS

Comment Number	Response
6-4	<p>Stream buffer widths are also influenced by the 2003 Biological Opinion prepared by US Department of Fish and Wildlife (USFW) and the National Marine Fisheries Service (NMFS) for the permitting of the 24<sup>th</sup> Street/SR167 Interchange. The City is considering re-initiating consultation on the 2003 BiOp and will not be making changes to the buffer widths until that process is completed. However, the City has the ability to increase buffer widths based on existing regulations in SMC 16.56.090:</p> <p><i>Based on the habitat assessment, habitat management plan, and comments from other agencies, the director may require mitigating measures to reduce the impacts of the proposal on critical habitat and/or wildlife areas. Mitigating measures may include, but are not limited to, increased buffers, building setbacks, enhanced buffers, reduced project scope, limitations on construction hours, limitations on hours of operation, and relocation of access. Projects may be denied if the proposal is likely to result in adverse effects to a threatened or endangered fish or wildlife species; or will result in extirpation or isolation of other critical fish, wildlife, or plant species or its habitat. The authority of the State Environmental Policy Act shall provide possible mitigation for all areas of wildlife habitat not covered by this chapter. (Ord. 2071 § 38, 2003: Ord. 1546 § 1 (part), 1992</i></p>
7. Tacoma-Pierce County Health Department	
7-1	<p>Staff has reviewed the TPCHD website and suggested mitigation measures; many are incorporated into the plan such as trails, allowance for mixed use development, residential densities greater than 20 du/acre, connection to regional transit, pedestrian friendly street design and design guidelines that require pedestrian connections to the street.</p>
7-2	<p>The comment is noted and forwarded to City decision makers.</p>
7-3	<p>The proposed comprehensive plan policies (Environment Element 2.3; 2.3.1; and 2.3.2) support agricultural businesses and protection of agricultural land in rural areas.</p>
7-4	<p>The comment is noted and forwarded to City decision makers.</p>
7-5	<p>As indicated on page 13 of the Comprehensive Plan, the Parks and Open Space Plan will be undergoing a significant update in 2015-2016 and will include consideration of “linear parks,” trails, etc.</p>
7-6	<p>As indicated on page 13 of the Comprehensive Plan, the Parks and Open Space Plan will be undergoing a significant update in 2015-2016 and will include an LOS related to access, such as within ½ mile of every residence.</p>

SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS

Comment Number	Response
7-7	<p>The comment is noted and forwarded to City decision makers. The Flood Damage Prevention Ordinance (SMC 15.52) addresses Critical facilities as follows:</p> <p><i>SMC 15.52.253 Critical facilities. Construction of new critical facilities shall be, to the extent possible, located outside the limits of the special flood hazard area (SFHA) (100-year floodplain). Construction of new critical facilities shall be permissible within the SFHA if no feasible alternative site is available. Critical facilities constructed within the SFHA shall have the lowest floor elevated three feet or more above the level of the base flood elevation (100-year) at the site. Flood proofing and sealing measures must be taken to ensure that toxic substances will not be displaced by or released into flood waters. Access routes elevated to or above the level of the base flood elevation shall be provided to all critical facilities to the extent possible.</i></p>
7-8	<p>The City currently requires low impact development for new construction in Sumner Municipal Code 13.48.520.</p>
7-9	<p>Staff is recommend adding sub-policy 1.1.7 to the Environment Element as follows: “1.1.7 Require trees and other vegetated barriers between busy roadways and schools, residential areas and other places with a high concentration of vulnerable children and adults.”</p>
7-10	<p>The comment is noted and forwarded to City decision makers. Currently, accessory dwelling units are allowed and there are existing small-scale multi-family structures throughout the single-family residential zones (LDR).</p>
7-11	<p>The amendment would allow for multi-family leased housing units <i>in addition to</i> condominiums.</p>
7-12	<p>The comment is noted and forwarded to City decision makers.</p>
7-13	<p>The comment is noted and forwarded to City decision makers. The City of Sumner contains a Manufacturing/Industrial Center that is second only to the Port of Tacoma for employment. This area is accessible via a short drive or bike ride to some of the most affordable housing in the area.</p>
7-14	<p>The comment is noted and forwarded to City decision makers. Pierce County currently operates a Community Connector service for special needs populations in Sumner. The City will continue to work toward provision of transit service in the future as demand dictates. See proposed Policy 2.4 in the Transportation Element.</p>
7-15	<p>The comment is noted and forwarded to City decision makers. See proposed policies under Goal 4 as they relate to healthy lifestyles and food availability in the Family and Human Services Element.</p>
7-16	<p>The trail plan update will include connections between on-street and off-street trails and facilities.</p>
7-17	<p>The comment is noted and forwarded to City decision makers.</p>
7-18	<p>The comment is noted and forwarded to City decision makers.</p>
7-19	<p>The comment is noted and forwarded to City decision makers.</p>
8. Tacoma- Pierce County Health Department	
8-1	<p>The comment is noted and forwarded to City decision makers.</p>

SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
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Comment Number	Response
8-2	The comment is noted and forwarded to City decision makers.
8-3	The comment is noted and forwarded to City decision makers.
<b>Community Organizations</b>	
<b>9. League of Women Voters</b>	
9-1	The comment is noted and forwarded to City decision makers.
<b>10. Master Builders Association of Pierce County</b>	
10-1	The comment is noted and forwarded to City decision makers.
<b>11. Nature Mapping Foundation</b>	
11-1	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
11-2	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
11-3	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
11-4	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
<b>12. Pierce County Biodiversity Alliance</b>	
12-1	The comment is noted and forwarded to City decision makers.
12-2	The comment is noted and forwarded to City decision makers. Staff recommendation at this time is to not adopt the Lower White River BMA Stewardship Plan 2009 but rather to work with the Pierce County Biodiversity Alliance in reviewing and completing the Sumner Chapter XII.
12-3	The comment is noted and forwarded to City decision makers. Staff recommends adding policy as follows: “The City will collaborate with partners and volunteers citizen groups that make up the Pierce County Biodiversity Alliance to assist in completing the Sumner Chapter of the Lower White River BMA Stewardship Plan.”
12-4	See response to 12-3.
12-5	See response to 12-3.
12-6	The comment is noted and forwarded to City decision makers.
12-7	<p>The comment is noted and forwarded to City decision makers. There are proposed amendments to the Vision Statement under “Parks, Recreation, and Open Space” recognizing that the city “has reserved lands in a natural state along rivers....to benefit fish and wildlife and biodiversity. The Values Statement under “Environment” further adds:</p> <p style="padding-left: 40px;"><i>We recognize the biologically rich and diverse area adjacent to the White River as a unique and special place and strive to protect and restore these areas to maintain and increase biodiversity. We recognize the benefits and importance of a healthy and functioning natural environment to the continued prosperity and quality of life in the city and region.</i></p>
12-8	See proposed amendments in Vision Statement of the Comprehensive Plan.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS**

<b>Comment Number</b>	<b>Response</b>
12-9	See proposed amendments in the Values Statement of the Comprehensive Plan incorporating biodiversity but at a level of detail consistent with the other topics and text.
12-10	See response to 12-3.
12-11	See proposed amendments to Goal 4 of the Environment Element of the Comprehensive Plan.
12-12	The comment is noted and forwarded to City decision makers. Staff does not recommend adding specific references to Biodiversity Management Areas before the Sumner Chapter of the <i>Lower White River BMA Stewardship Plan</i> is complete.
12-13	See response to 12-12.
12-14	See response to 12-12.
12-15	The comment is noted and forwarded to City decision makers. See response to 12-3.
<b>13. Pierce County Biodiversity Alliance</b>	
13-1	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
13-2	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
<b>14. Puyallup River Watershed Council</b>	
14-1	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
14-2	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
14-3	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
<b>15. Sumner School District</b>	
15-1	The comment is noted and forwarded to City decision makers.
15-2	The comment is noted and forwarded to City decision makers.
<b>16. Tahoma Audubon Society</b>	
16-1	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
16-2	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
16-3	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
16-4	The comment is noted and forwarded to City decision makers. See also responses to letter 12.
<b>16A. American Rivers</b>	
41-1	The comment is noted and forwarded to City decision makers. See responses to letter 12.
41-2	The comment is noted and forwarded to City decision makers. See responses to letter 12.
41-3	The comment is noted and forwarded to City decision makers. See responses to letter 12.
41-4	The comment is noted and forwarded to City decision makers. See responses to letter 12.
<b>Public and Property Owners</b>	



**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS**

<b>Comment Number</b>	<b>Response</b>
<b>17. Albert and Louise Belcher</b>	
17-1	The comment is noted and forwarded to City decision makers.
17-2	The comment is noted and forwarded to City decision makers.
17-3	The comment is noted and forwarded to City decision makers.
17-4	The comment is noted and forwarded to City decision makers. Staff is recommending retaining this property and others west of 160th Avenue East as General Commercial with the East Sumner Urban Village (ESUV) overlay.
<b>18. DeGoede Brothers, LLC</b>	
18-1	Yes, the City is proposing these changes and documents as part of the 2015 Comprehensive Plan Update as required by GMA.
18-2	Yes, this is an accurate summary of the main goals and intent of the East Sumner Neighborhood Plan Update.
18-3	Yes, as part of the ESNP update the City will be considering a Planned Action Ordinance per SEPA.
18-4	Improvements on Main Street/60 <sup>th</sup> Street will be funded by adjacent property owners as land develops/redevelops per City Code. Improvements include curb, gutter, and sidewalks, street paving and stormwater as required. Bicycle amenities would be provided at that time but actual improvements have not been determined.
18-5	At this time the plan does not require additional right-of-way for the pedestrian/bicycle improvements.
18-6	The commenter's property is proposed to be Neighborhood Commercial/ESUV which allows for but does not require mixed use development. Staff is recommending adding "retail and wholesale nurseries and greenhouses" as a permitted use in the NC/ESUV zone to ensure that it is not a "nonconforming use" in the future. Other zoning details are provided in the draft East Sumner Neighborhood Plan as an appendix on page 45.
18-7	The final configuration for the Main Street/60 <sup>th</sup> Street and Sumner-Tapps Hwy intersection has not been determined. Prior to any closing of this intersection a new 62 <sup>nd</sup> Street and a north-south connection to Main Street/60 <sup>th</sup> Street will have to be completed.
18-8	A signal at Main Street/60 <sup>th</sup> Street and 160 <sup>th</sup> Avenue would only be required if warranted. Additional right-of-way may be required to meet minimum turning radii.
18-9	Staff is recommending that the DeGoede's property be rezoned from GC/ESUV to NC/ESUV.
18-10	The comment is noted and forwarded to City decision makers. Staff met with the DeGoedes on April 9, 2015 to discuss their concerns.
18-11	See response to 18-10.
18-12	Those listed will become parties of record and included in mailing and distribution of future notices.
<b>19. Jeanne Francher</b>	
19-1	The comment is noted and forwarded to City decision makers.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS**

<b>Comment Number</b>	<b>Response</b>
<b>20. Mike R. Hebert</b>	
20-1	The comment is noted and forwarded to City decision makers. In addition to improving the Main Street/Sumner-Tapps Hwy, the new 62nd Street would provide access to the middle of the block creating additional development potential and further dispersing traffic in and through the neighborhood. The expense of the new road would be born mainly by those abutting the new street and others benefiting as well. A Local Improvement District (LID) will be required and property owners have the option to protest the formation of the LID and assessments if the costs exceed the benefits.
20-2	The comment is noted and forwarded to City decision makers. The ESNP contains discussion about the need to coordinate with WSDOT regarding the Sumner-Tapps/166th Ave and SR410 interchange. Ongoing discussions and planning, and possibly City funds, will be needed to plan, design, and construct the necessary improvements. Reinstating the original westbound exit is an option that has been discussed.
20-3	The comment is noted and forwarded to City decision makers. The majority of the street and sidewalk improvements that occur in the City are from private development. The ESNP proposes multifamily at up to 40 du/acre with a maximum 40% lot coverage intending to create an open feel between structures. In addition, single-family zoning north of Main Street/60 <sup>th</sup> Street will be retained. See response to comment 23-1 regarding housing variety and character. Not all development will be 4-stories, and staff is recommending that commercial be at the ground-floor street edge. These code revisions paired with the design guidelines will ensure quality development.
20-4	The comment is noted and forwarded to City decision makers. The City’s regulations allow wetlands to be mitigated off-site (see SMC 16.46.170) provided they are in the same watershed (see SMC 16.46.170(B)). Furthermore, wetlands that contain a certain “critical mass” can produce superior results than wetlands individually and mitigated in a smaller area. Costs will be borne by the developer through payment for wetlands “credits” and this has to be calculated prior to any commitment of funds.
20-5	The comment is noted and forwarded to City decision makers. Both the NC and GC areas allow for mixed use. Staff is recommending that in some instances ground floor commercial uses front on the street with multi-family behind.
20-6	The comment is noted and forwarded to City decision makers. The three alternatives are distinctly different, see Chapter 2 in Volume II: Draft SEIS for a full description of the alternatives. The area has been zoned for development in the City for 25 years with little change. Likewise, dealing with wetlands site-by-site was considered a hindrance in the 2001 ESNP to good quality development.
20-7	An increased number of residences in an area will encourage commercial growth along with the new YMCA. The ESNP has a 20-year time horizon and while there is no guarantee development will occur, the idea is to create an optimum environment for it to occur.
20-8	The comment is noted and forwarded to City decision makers.
<b>21. Pam Holt</b>	
21-1	The comment is noted and forwarded to City decision makers. City street standards include a requirement for sidewalks and bike paths and routes in areas planned for those facilities.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
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<b>Comment Number</b>	<b>Response</b>
21-2	The comment is noted and forwarded to City decision makers. Street lights will be required per City code for any new development, balancing the need for safety and privacy. Street trees are required for new road construction, along with sidewalks. Flower baskets are a partnership between business owners (Sumner Downtown Association) and the City but could be extended to East Sumner. The City has an active Code Enforcement Officer who is responsible for responding to graffiti issues.
21-3	The comment is noted and forwarded to City decision makers.
<b>22. Shannon &amp; Keith Properties, LLC</b>	
22-1	Staff is not recommending Interchange Commercial for this area because it is an auto-oriented zone that is best suited south of SR410 and does not integrate well with an urban village concept and vision.
<b>23. VSI Law Group on behalf of Bechtold, John and Jackee</b>	
23-1	Staff recommends including other housing types and styles for the NC/ESUV overlay as follows: Cottage housing and zero lot line housing as these are distinct housing types that are not clearly allowed as multi-family. Staff does not support single-family residential in a mixed use zone primarily because it won't encourage the densities needed to help support business.
<b>Public Meeting Written Comments</b>	
<b>24. Anonymous Comment Form</b>	
24-1	The comment is noted and forwarded to City decision makers. The transportation plan includes improvements to Sumner-Tapps Hwy.
24-2	The comment is noted and forwarded to City decision makers. Staff is recommending that senior housing be allowed as a permitted use independent of the mixed use requirement and therefore encouraged.
24-3	Numerous stakeholders would benefit from successful projects including: property owners; developers and investors; business owners and the City of Sumner as a whole.
<b>25. Anonymous Comment Form</b>	
25-1	The comment is noted and forwarded to City decision makers.
25-2	The comment is noted and forwarded to City decision makers.
<b>March 19, 2015 Public Hearing</b>	
<b>26. Mark Nelson</b>	
26-1	If the intersection of Main Street/60 <sup>th</sup> Street and Sumner-Tapps Hwy were closed, evacuation routes would be altered to show 62 <sup>nd</sup> Street as the new route.
26-2	The Plan shows a non-motorized connection needed between Parker Road and the YMCA on 160 <sup>th</sup> Avenue E. See figure on page 23 of the East Sumner Neighborhood Plan.
<b>27. Greg Amann representing John and Jackie Bechtolt</b>	
27-1	See response to comment letter 23-1 from the VSI Law Group.

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS**

<b>Comment Number</b>	<b>Response</b>
<b>28. John Huntsman</b>	
28-1	The demand for emergency services and schools has been considered in the Draft SEIS in Chapter 3, Section 3.9: Public Facilities, Capital Facilities and Utilities.
<b>29. Myra Vernon</b>	
29-1	The comment is noted and forwarded to City decision makers.
<b>30. Mike Kersey</b>	
30-1	The comment is noted and forwarded to City decision makers. Staff is recommending that the property Mr. Kersey referenced retain a General Commercial/ESUV designation.
<b>31. Jeanne Fancher</b>	
31-1	The comment is noted and forwarded to City decision makers. Rainier View Park is within ½ mi. walk of the center of the ESNP, but other areas could be considered for park space.
31-2	The GMA requires the City to accommodate it's fairshare of growth in the County, which is determined by growth trends and forecasts. Increasing allowed densities would increase values to make mitigation of wetlands off-site feasible.
<b>32. Tia Ball</b>	
32-1	A traffic light is not currently planned at the intersection of Zehnder and Fryar Avenue but would be installed when warranted.
<b>33. John Huntsman</b>	
33-1	Comments pertain to a specific building in town and are not relevant to the 2015 Update. However, all oil and other stormwater run-off is contained and treated prior to discharge to the White River. This is regulated by both EPA and Department of Ecology.
<b>34. George Josten</b>	
34-1	The comment is noted and forwarded to City decision makers.
<b>35. Robin Machofsky</b>	
35-1	The golf course property has a 200 foot setback from the river to reduce potential impacts and provide for wildlife and fish habitat. The golf course is currently zoned M-1 and within the 100 year floodplain. Any development will have to comply with applicable regulations to reduce loss associated with flooding or any impacts on the 100-year flood level.
<b>36. Tia Hall</b>	
36-1	The comment is noted and forwarded to City decision makers. The existing use has an adequate number of off-street parking stalls for the business at this location. On-street parking regulations are enforced by the City of Sumner Code Enforcement Officer. This section of Wood Avenue is not within a restricted parking zone.
<b>37. Jeanne Fancher</b>	

**SUMNER COMPREHENSIVE PLAN UPDATE SEIS  
RESPONSE TO COMMENTS**

<b>Comment Number</b>	<b>Response</b>
37-1	The comment is noted and forwarded to City decision makers. The City would have the option to develop as a wetland bank.
38. Linda Burgess	
38-1	The comment is noted and forwarded to City decision makers. See response 37-1.
38-2	The comment is noted and forwarded to City decision makers.
39. Jeanne Fancher	
38-1	The comment is noted and forwarded to City decision makers.
April 2, 2016 Public Hearing	
42. Linda Burgess	
42-1	See response to comment 12-3.
43. Jerry Broadus	
43-1	See response to comment 12-3.
44. Jeanne Fancher	
44-1	The comment is noted and forwarded to City decision makers. Se responses to letter 12.
45. Linda Burgess	
45-1	The railroad crossing was rebuilt and redesigned about 10 years ago and the current configuration was approved by the railroad for safe operation. No changes are planned in the near future.
46. Randall Adams	
46-1	Staff is proposing that updated traffic impact fees be adopted that are similar to surrounding jurisdictions rather than much higher in order to be competitive for economic development and new business. The City has not closed on the sale of the golf course. Any park would be located at the east end near Sumner-Tapps Hwy. The City obtained necessary permits from federal and state agencies to move Salmon Creek to enhance the resource. Work will be completed this summer. Mixed use is a combination, in the same structure, of commercial and residential uses similar to historic downtowns. The original plan did contain more single-family residential then is currently proposed.
47. Jeanne Fancher	
47-1	The comment is noted and forwarded to City decision makers.

## 4.4 Marked Public Comments

Each written comment letter addressed in Section 4.2 follows. Comments are marked with unique identifying numbers, consistent with Section 4.2.

**Ryan Windish**

**From:** Karen Walter <KWalter@muckleshoot.nsn.us>  
**Sent:** Friday, April 24, 2015 4:45 PM  
**To:** Paul Rogerson; Ryan Windish  
**Subject:** City of Sumner Comprehensive Plan Update 2015 and Draft Environmental Impact Statement

Paul and Ryan,

We have reviewed Sumner's proposed Comprehensive Plan Update 2015 and its associated Draft Environmental Impact Statement. We offer the following attached comments in the interest of protecting and restoring the Tribe's treaty-protected fisheries resources. We organized them between the two volumes and referenced page numbers or figures accordingly.

**Volume 1: Comprehensive Plan Update 2015 Comments****1. Section 2.2- Natural Hazards**

The policies and regulations regarding flood hazards needs to be updated to include language that For example, Section 2.2 in Natural Hazards, it missing policy language that includes the following issues:

- a. Requires the City and applicants to use the most current flood maps;
- b. Recognizes channel migration and river bed aggradation conditions that can affect floodplain areas and protect these areas from filling and further adverse impacts;
- c. Provides for functional riparian areas that are measure from the channel migration zones which may be different that the Ordinary High Water Mark;
- d. Project in or near the floodplain avoid to fullest extent possible adding more fill to floodplain areas and mitigate where filling is unavoidable.
- e. Changes to these policies may require changes to the land use and zoning maps.
- f. Bridge redevelopment projects need to account for changes in riverbed sediment deposition affecting flood elevations levels. Bridge abutments within ordinary high water marks should be relocated and placed outside of the floodplain to the fullest extent possible.

1-1

2. The policies identified in Section 2.2.4 and 3.2 require protection of wetlands in Sumner. It is not clear how the proposed wetland mitigation bank described in the East Sumner Neighborhood plan is consistent with these policies; as well as, mitigation sequencing requirements per State and federal regulations.

1-2

3. The plan also talks about widening the 8<sup>th</sup> Street Bridge crossing on the White River. This crossing should also be elevated to allow for river bed gravel accumulation that will affect flood elevations levels and also allow for the passage of wood unencumbered under the new bridge.

1-3

4. The City should conduct a wetland mitigation bank feasibility study before including this approach in the Comprehensive plan as may affect the future land use and transportation improvements identified in the East Sumner Neighborhood subarea plan. This feasibility study would include looking at the extent of mitigation opportunities within the Salmon Creek subbasin before looking at areas outside of this subbasin to ensure that opportunities are fully realized consistent with mitigation sequencing requirements per State and Federal regulations.

1-4

5. The Best Available Science (BAS) review (pages 26-27) is incorrect regarding WDNR water typing. WAC 222-16-030 is not in place as the WA Forest Practices Board has not adopted water typing maps statewide. WAC 222-16-031 is the correct version and should be used because it includes regulations regarding potential fish habitat. There is no consideration of potential fish habitat in the City's regulations according to the BAS review.

1-5

6. The BAS review is missing the 2008 NMFS BiOp for the National Flood Insurance Program as a requirement for the White River (pages 26-28) which was written in part due to concerns for White River Spring Chinook. It has requirements

1-6

regarding floodplain development; channel migration zones, and riparian areas which were not considered in the 2003 SR 167 BiOP. In the January 30, 2015 letter to Sumner, NMFS has retracted the SR 167 BiOP as being appropriate for floodplain issues. The BAS review is incorrect on page 33. The BAS review and potentially the regulations should be updated accordingly.

**Volume 2 Draft Environmental Impact Statement for the Comprehensive Plan 2015 Update**

7. More information is needed as to how the “No-Action” alternative can include the Sumner Meadows Golf Course Alternative 2 establishing M-1 zoning along Stewart Road and Golf Course when the City only recently issued a Notice of Application for this zoning change (January 2015; PLN 2015-0002) and has not responded to our comments to the NOA. 1-7

8. The Action Alternative 2 (Minimal Zoning) should include the MIC Zoning for the Sumner Golf Course and it should include an “Open Space” land use designation for the Salmon Creek areas where the City proposes to create forested wetlands and an enhanced stream corridor as described on page 27 of the East Sumner Neighborhood Plan Update. 1-8

9. The Action Alternative 3 should include the MIC Zoning issue identified above; the Open Space designation for the Salmon Creek areas identified above; and a correction for the City owned Ag land identified for the bank. Per the Notice of Application for PLN 2015-0007, the City intends to rezone the City-owned Ag Land rezone of 102.19 acres from Agriculture to Residential Protection that encompass several parcels south of 24<sup>th</sup> Street E. If this is still the intent, it should be reflected in the DEIS and analyzed to determine if the residential protection zoning would allow a wetland mitigation bank as the City proposes. 1-9

10. Another comment to this Alternative is the effect of establishing a park along Salmon Creek in the East Sumner Neighborhood when this area is also identified as needed to create a forested wetland and restoration of the stream corridor. 1-10

11. Section 1.5 (“Major Issues, Significant Areas of Controversy and Uncertainty, and Issues to be Resolved”) is missing any consideration of how the plan’s proposed changes can occur in compliance with NMFS’ ESA 2008 Biological Opinion for National Flood Insurance Program. It is also missing any consideration as to how the 24<sup>th</sup> Street Bridge and road widening project can be implemented if further floodplain filling is needed and how it will be successfully mitigated not just for ‘no-rise’ but also does not cause further degradation of salmon habitat. Finally, the Tribe has outstanding concerns with the City’s proposed water supply plans which need to be addressed. 1-11

12. The FEIS should evaluate the likelihood of a wetland mitigation bank being successfully built in the White River floodplain on the City owned land if this area is needed to serve as active floodplain with a potential migrating channel that provides salmon habitat functions. This evaluation should include the wetland feasibility study noted. 1-12

13. On page 1-11, please describe how the City has been complying with the requirements of the National Flood Insurance Program to protect new and existing development in and near floodplains. The two January 30, 2015 letters from National Marine Fisheries Services on this topic indicates that the City needs to come into compliance with these requirements. Further, we are concerned that the proposal to excavate materials along 3.0 miles of the White River floodplain adjacent to the Ordinary High Water as mitigation for floodplain filling will create adverse impacts to salmon habitat and habitat processes and preclude restoration projects needed to improve salmon habitat and production. 1-13

14. On page 1-13, the mitigation measures section fails to consider how the impacts from further floodplain filling from the 24<sup>th</sup> Street and the potential development projects on the east side of the White River may eliminate previously identified levee setback and salmon habitat restoration projects. The proposed wetland mitigation bank may also eliminate these projects. Per the Pierce County Surface Water Management 2008 levee setback feasibility study (GeoEngineers, 2008, Levee Setback Feasibility Analysis – Puyallup River Watershed, Prepared for Pierce County Public Works and Utilities), it includes a project identified as “24<sup>th</sup> Street East Pointbar Site” where a levee setback between RM 3.2 and RM 3.6 would benefit Chinook and coho salmon, improve flood protection, promote channel migration, and improve connectivity to existing secondary and abandoned channels without excavation of a connecting channel. Land on the east side of the White River at the Project site was also identified as a site-specific restoration opportunity in the City’s revised Draft Shoreline Master Program (SMP). The restoration project identified would “remove approximately 1,500 linear feet of existing levee and construct a setback levee reconnecting approximately 9.2 acres of riparian and floodplain area. The project, currently in planning and initial design stages by the City, would improve connectivity of the White River to off channel habitats.” 1-14

15. Pages 1-26 and 1-27 – See previous comments regarding the City’s water supply plans and outstanding tribal concerns. 1-15

16. Exhibit -3-5, The floodplains figure is missing the channel migration zone 1-16

17. Page 3-10, As noted previously, the City needs to demonstrate how it is complying with the 2008 NFIP Biological Opinion and as described on this page in the two bullets. Further filling within the floodplain and wetlands should be avoided to the fullest extent possible and where unavoidable, additional details and analyses are needed before adequate mitigation can be identified. 1-17

18. Pages 3-10 and 3-11, We have noted in previous comments to the 24<sup>th</sup> Street Bridge project concerns with the Lower White River Hydraulic Investigation Memorandum” (WEST Consultants, Inc., 2014). This Memorandum identified mitigation concepts A through H describe excavating the White River along its banks from the Ordinary High Water Mark up to 200 feet along a total river length of 3.2 miles. Assuming an average river width of 80 feet, this excavation area is approximately 77.6 acres, or 267% of the current channel area along the same river length. This is a substantial amount of excavation and raises questions regarding precedent, ecologic, geomorphic, and temporal efficacy concerns. The Memorandum is a draft and incomplete. It lacks references; a description of values for flows considered (OHW and 100-year flood); a discussion of confidence intervals; a discussion of sediment trends and changes in channel roughness that may alter modeled flood elevations during the Project duration; and a discussion of the basis for significant differences among reported flood elevations and those modeled in previous studies. This memorandum needs to be revised to address these deficiencies with an opportunity for the Muckleshoot and Puyallup Tribes and regulatory agencies to review the revised Memorandum before any of its alternatives are proposed for the Comprehensive Plan and the cumulative impacts analysis in the DEIS. 1-18

19. Page 3-11- Please explain how King County’s Countyline levee project is serving to compensate for the development planned at the former Sumner Meadows Golf Course property. 1-19

20. Exhibit 3-6 Wetlands and Streams Map- This map is incomplete. There were wetlands shown in the 2007 Wetlands Map which are missing from this map. Also, there is an existing remnant channel of the White River which should be mapped and shown as Type F water just south of 32<sup>nd</sup> Street E which flows into the White River on the left bank. There are also ditched waterbodies that should be on this map as they may provide salmon habitat during some parts of the year(s). We would appreciate a copy of the data used to determine the location, existing and typing of streams shown on this map. 1-20

21. Page 3-17- See our previous comments regarding concerns with the proposed wetland mitigation bank. 1-21

22 Page 3-18, More information is needed regarding the proposed Salmon Creek restoration actions including, but not limited to, if these are truly stand alone projects or serving as mitigation for project impacts. 1-22

23. Page 3-19- There are also ditched waterbodies that should be identified and described as they may provide salmon habitat during some parts of the year(s). 1-23

24. Page 3-22- Please provide additional information regarding the proposed Critical Areas Regulations changes, including, but not limited to, when they will be available for review. 1-24

25. Page 3-23- The DEIS lacks an analysis as to how the proposed alternatives may affect or eliminate projects identified in the Shoreline Master Program’s restoration plan. 1-25

26. Page 3-132- As noted in previous comments, the Tribe has outstanding concerns with the City’s proposed water supply plans which need to be addressed. 1-26

27. Page 3-137, The City needs to adopt the most current Ecology stormwater manual. 1-27

We appreciate the opportunity to review these materials and look forward to receiving the City’s responses. Please let me know if you have any questions.

Thank you,  
Karen Walter  
Watersheds and Land Use Team Leader

*Muckleshoot Indian Tribe Fisheries Division  
Habitat Program  
39015 172nd Ave SE  
Auburn, WA 98092  
253-876-3116*





# Puyallup Tribe of Indians



April 21, 2015

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

**RE: 2015 Comprehensive Plan Update**

Dear City of Sumner Planning Commission:

I am writing on behalf of Puyallup Tribal Fisheries to express our support for the amendment to the City of Sumner’s Comprehensive Plan to include the following language.

II. VISION: *“The City has reserved lands in a natural state along rivers and wetlands for passive enjoyment and to benefit fish and wildlife and biodiversity.”*

2-1

III. VALUES: *“We recognize the biologically rich and diverse area adjacent to the White River as a unique and special place and strive to protect and restore these areas to maintain and increase biodiversity. We recognize the benefits and importance of a healthy and functioning natural environment to the continued prosperity and quality of life in the city and region.”*

2-2

ENVIRONMENT ELEMENT: The amendment to goal three.  
*“Protect and enhance unique, valuable, and critical fish, plant and wildlife habitat and promote bio-diversity.”*

2-3

We strongly recommend that in addition to the above, a specific amendment be added which suggests **The Lower White River BMA Stewardship Plan – Dec 2009** be used as a reference to identify threats and possible conservation strategies to achieve biodiversity preservation and that the document be added as an appendix to the comprehensive plan.

2-4

Biodiversity has been defined as the existence of a wide variety of plant and animal species in their natural environments. Maintaining biodiversity is economically valuable because it provides breathable air, drinkable water, food, pollution and pest control, and resilience after natural catastrophes, such as floods and drought.

Additional benefits of planning for biodiversity conservation include:

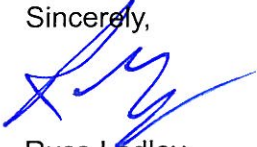
- Protection for remaining high-quality land cover important for fish and wildlife.
- Implements Growth Management Act requirements for Habitat Conservation Areas.
- Provides regional connectivity network for fish and wildlife dispersal and migration.
- Establishes a proactive approach to help avoid future listings under ESA.



In 2000 a Biodiversity Network consisting of 16 Biodiversity Management Areas (BMA) was created in Pierce County. These BMA's are the "best of the best" ecosystems. The Network includes the Lower White River BMA, which partially lies within the City of Sumner's boundaries.

Biodiversity is a top priority for the tribe in its quest for improved fisheries and floodplain habitat. We strongly support the City of Sumner's commitment to conserve biodiversity in coordination with new development, especially in the Lower White River BMA, which has already been identified as an area of extreme importance. Please consider supporting these amendments that encourage protecting biodiversity.

Sincerely,



Russ Ladley  
Resource Protection Manager  
Puyallup Tribal Fisheries



State of Washington  
**Department of Fish and Wildlife**

Mailing Address: 7801 Phillips Rd SW, Lakewood WA 98498 (206) 499-2697  
 Main Office Location: Region 6 Field Office, 48 Devonshire Road, Montesano WA 98563-9618

April 6, 2015

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



Subject: 2015 Comprehensive Plan Update

Dear City of Sumner Planning Commission:

In 2000 a Biodiversity Network consisting of 16 Biodiversity Management Areas (BMA) was created in Pierce County. These BMA's are the "best of the best" ecosystems, meaning those areas that have the highest value for wildlife and habitat conservation similar to critical areas. The Network includes the Lower White River BMA, which partially lies within the City of Sumner's boundaries.

Critical areas typically focus on a particular species or particular habitat. Biodiversity is defined as the existence of multiple native plant and animal species in their natural environments existing in a particular area. Biodiverse areas may contain critical areas in addition to habitat needed to keep common species common. Biodiversity preservation also provides habitat to meet the needs of species across their entire life cycle rather than only the most critical period, which is normally the focus of CAO. Maintaining biodiversity is economically valuable because it provides breathable air, drinkable water, food, pollution and pest control, and resilience after natural catastrophes, such as floods and drought.

Additional benefits of planning for biodiversity conservation include:

- Protection for remaining high-quality land cover important for fish and wildlife.
- Implements Growth Management Act requirements for Habitat Conservation Areas.
- Provides regional connectivity network for fish and wildlife dispersal and migration.
- Establishes a proactive approach to help avoid future listings under ESA.

I would like to express the Washington Department of Fish and Wildlife's support for the following specific amendments to the City of Sumner's Comprehensive Plan. In particular, I strongly urge the City of Sumner to incorporate The Lower White River BMA Stewardship Plan- (Dec 2009) as a reference document within the comprehensive plan. This need is in bold as follows:

II. VISION: "The City has reserved lands in a natural state along rivers and wetlands for passive enjoyment and to benefit fish, wildlife, and biodiversity."

3-1

3-2

III. VALUES: *“We recognize the biologically rich and diverse area adjacent to the White River as a unique and special place and strive to protect and restore these areas to maintain and increase biodiversity. We recognize the benefits and importance of a healthy and functioning natural environment to the continued prosperity and quality of life in the city and region.”*

3-3

ENVIRONMENT ELEMENT:

3. *Protect and enhance unique, valuable, and critical plant and wildlife habitat and promote biodiversity.*

3-4

Chapter IV (Element-Environment Element)—Goals, Policies, and Objectives (p75)

- Add Goal: Protect biodiversity and the full range of supporting habitats. ← 3-5
- Add Objective: The Lower White River Biodiversity Management Area must be protected in order to benefit from the important ecosystem services it provides such as clean water, natural flood control, climate regulation, and pollination critical to the continued prosperity and quality of life. ← 3-6
  - Add Strategy: **The City shall use The Lower White River BMA Stewardship Plan- (Dec 2009) as a reference to identify threats and possible conservations strategies to achieve biodiversity preservation.** ← 3-7
  - Add Strategy: **Add the stewardship plan as an appendix to the comprehensive plan.**
- Add Objective: The City shall partner with the Pierce County Biodiversity Alliance to complete Chapter XII (City of Sumner) of the Lower White River BMA Stewardship Plan ← 3-8
- Add Objective: The City shall identify partners and volunteer citizen groups who can advance the City of Sumner Lower White River BMA Stewardship Plan. ← 3-9
- Add Objective: The City shall coordinate with other jurisdictions within the Lower White River BMA (Auburn, Pacific, Buckley, Pierce County, King County, Muckleshoot Tribe of Indians) and meet periodically to align goals, objectives and strategies, and monitor progress. ← 3-10

In addition to the specific inclusions above, there appears to be various instances throughout the comp plan draft which discusses either ‘environment’ or ‘wildlife’ where the city should consider adding ‘biodiversity’ or ‘retention and enhancement of biodiversity’. Members of the Pierce County Biodiversity Alliance welcome the opportunity to work further with your staff to address this.

3-11

Biodiversity is a top priority for Washington Department of Fish and Wildlife. We strongly support the City of Sumner’s commitment to conserve biodiversity in coordination with new development, especially in the Lower White River BMA, which has already been identified as an area of extreme importance. Please consider supporting these amendments that encourage protecting biodiversity.

Sincerely,



Michelle Tirhi,  
District Biologist, Pierce and Thurston County  
Washington Department of Fish and Wildlife



**Washington State  
Department of Transportation**

Lynn Peterson  
Secretary of Transportation

**Olympic Region**  
5720 Capitol Boulevard, Tumwater  
P.O. Box 47440  
Olympia WA 98504-7440  
360-357-2600 / FAX: 360-357-2601  
TTY: 1-800-833-6388  
www.wsdot.wa.gov

April 24, 2015

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

RE: City of Sumner Comprehensive Plan, Transportation Plan, and East Sumner  
Neighborhood Plan Updates

Dear Mr. Windish:

Thank you for allowing the Olympic Region of the Washington Department of Transportation (WSDOT) the opportunity to review and comment on your proposed Comprehensive Plan Transportation Plan, East Sumner and Neighborhood Plan Updates and Supplemental Environmental Impact Statement (SEIS). We recognize the investment of time and energy that this document represents and we appreciate the opportunity to comment. The following comments are provided for your consideration as the City completes its update.

**City of Sumner Comprehensive Plan Update**

General Comment: The Comprehensive Plan appears to be primarily goals and policies that the city will be striving for and that essential elements as identified in RCW 36.70A.070 are referenced to functional plans such as the Transportation Plan. We would suggest that the discussion of essential elements, such as 10-year forecast, LOS transportation facilities inventory, etc. should also occur in the comprehensive plan and not just the functional plan. It has been found that functional plans and comprehensive plans are sometime not consistent where one or the other is updated or amended out of cycle with the other. In addition if one wants to review the comprehensive plan they would require the plan that is being referenced in the comprehensive plan, which sometimes is not available.

4-1

Page 36, 1.11: Recommend clarifying which interchange you are addressing in this objective, there are four interchanges on or associated with SR 410.

4-2

Page 93, **Agency Coordination**, policy 2.1, last bullet: SR 410 is not identified in the current Statewide Highway System Plan (HSP) to be widened to add High Occupancy vehicle (HOV) lanes nor is it likely funding for HOV lanes will be available within the next 20 years based upon current priorities.

4-3

Page 101, **Pedestrians and Bicycles**; consider adding statement that bicycle & pedestrian accommodations contributed to a balanced quality of city life.

4-4

Page 102 **Pedestrians and Bicycles**, 4.4 City should consider policy/goal of pursuing WSDOT Safe Routes to School grants for school walk/connectivity projects,

4-5

### 2015 Summer Transportation Plan

Page 9, **2.1 Coordination with State Highway System Plan**, 4th bullet near bottom of page: as noted earlier SR 410 is not identified in the current Statewide Highway System Plan (HSP) to be widened to add High Occupancy vehicle (HOV) lanes nor is it likely funding for HOV lanes will be available within the next 20 years based upon current priorities. Current plans call for Intelligent Transportation Systems (ITS) to be implemented between SR 167 and 166<sup>th</sup> Ave interchanges.

4-6

Page 11, **Level of Service Standards**, Policies, 3.1, the way the first sentence in this section is written it appears that the level of service (LOS) standard for the four corridors identified should be LOS D as the other arterials and collectors within the city. However believe the intent is to identify the four corridors as being exempt from LOS D. Recommend rewriting this portion to clarify the LOS for city streets is LOS D and that the city is accepting a LOS F for the corridors identified.

4-7

Page 13, 3.4 **Functional Classification**: Missing a hyperlink where “Error! Reference source not found”.

4-8

Page 19, **5.5 High Occupancy Vehicle Facilities**: Delete “... and SR 410,” The current *2007-2026 Highway System Plan* does not reference HOV lanes on SR 410.

4-9

Section 3, **Inventory of Existing Transportation System**: Some of the arterial and collector roadway descriptions do not include a speed limit. For consistency, recommend including speed limits in all roadway descriptions while stating to defer to city ordinance if the road has no posted speed limit.

4-10

Page 43, **Traffic Operations**, last paragraph; Missing a hyperlink where “Error! Reference source not found”.

4-11

Page 51-53: Recommend inserting a Section 409 disclaimer immediately after Traffic Safety or within the subsequent tables showing crash data. The disclaimer should read “**Under Section 409 of Title 23 of the United States Code, crash data is prohibited from use in any litigation against the state, tribal or local government that involves the location(s) mentioned in the crash data.**”

4-12

Page 70, **24<sup>th</sup> Street Extension to East Valley Highway**, 2<sup>nd</sup> paragraph: change the word “project” to read “projected”.

4-13

Page 86, **Freeway System and State Highway Improvements**, 4<sup>th</sup> paragraph: The document references WSDOT “*Highway System Plan 2003-2022*”, the current State Highway System Plan (HSP) is *2007-2026 Highway System Plan* (December 2007) with a technical update in 2008. The current HSP should be used to identify improvements not the 2003 version; HOV on SR 410 is not identified in the current HSP. The HOV on the SR 410 corridor is also not identified in PSRC’s plans. SR 410 improvements likely to be funded with the next 20 years are Intelligent Transportation Systems (ITS) from SR 167 to 166<sup>th</sup> Ave E interchange.

4-14

Page 87, 3<sup>rd</sup> paragraph last sentence: Consider adding a sentence to the effect “The current *2007-2026 Highway System Plan* includes an unfunded solution to add a southbound lane from the SR 410 eastbound on/off ramps to 96<sup>th</sup> Street East on SR 162”.

4-15

Pages 89 through page 93 appear to date back to a Year 2002 Sumner Transportation Plan done in February 2003. Is the intent to update these pages to year 2015? Strategies like 4/5 lanes on SR 162 from SR 410 to Pioneer should be revised to reflect a 3-lane strategy from SR 410 to 96<sup>th</sup> (southbound and northbound) as noted in the current HSP.

4-16

Appendix C: Recommend updating Table C-1 with HCM 2010 Exhibit 15-3 criteria.

4-17

### **City of Sumner Draft Capital Facilities Plan**

Appendix D, **Transportation Improvement Projects and Programs**, ID numbers 17.2 and 17.3 (SR 162 4/5 lane widening) along with 37 and 38 (SR 410 HOV) consider revising.

- ID numbers 17.2 and 17.3: The current unfunded *2007-2026 Highway System Plan* strategy for SR 162 is a bottleneck and chokepoint solution to add a southbound lane from the SR 410 Eastbound off ramp to 96<sup>th</sup>, not 4/5 lane widening.
- ID numbers 37 and 38: Improvements identified for SR 410 within the next 20 years is Intelligent Transportation System improvements from SR 167 to 166<sup>th</sup> Ave E, not HOV based upon current priorities.

4-18

4-19

### **Draft City of Sumner Volume II: Supplemental Environmental Impact Statement**

Page 3-190, Exhibit 3-105, Transportation Improvement Projects: These strategies appear to date back to 2002 rather than being a 2015 update. For example the SR 162 widening to 5 lanes between SR 410 and Pioneer appear to be from an old Highway System Plan. The current 2007-2026 Highway System Plan includes an

4-20

April 24, 2015  
Mr. Ryan Windish  
Page - 4

unfunded bottleneck and chokepoint strategy to add a southbound lane on SR 162 from the SR 410 Eastbound off/on ramps to 96<sup>th</sup> street intersection.

Exhibit 3-105 is different than Figure 15 of the Comprehensive Plan; seems like they address the same thing.

4-21

Page 3-190, Figure 5.2a. could not find Figure 5.2b as referenced on Figure 5.2a.

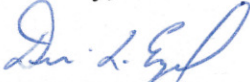
4-22

Page 3-191, 1<sup>st</sup> bullet references a non-motorized overcrossing of SR 410; a new crossing is not identified in Exhibit 3-106, Major Pedestrian System Plan on page 3-192.

4-23

Again thank you for the opportunity to review and comment on the proposed City of Sumner Comprehensive Plan updates. If you have any questions related to this letter please contact George Kovich of my office at (360) 704-3207.

Sincerely,



Dennis Engel P.E.  
Transportation Planning Manager

DE:gk  
gk

cc: Ike Nwankwo (Commerce)  
Anne Aurelia Fritzel (Commerce)  
Yorik Stevens-Wajda (PSRC)  
Leah Bolotin (WSDOT)





Letter #4A

STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

1011 Plum Street SE • PO Box 42525 • Olympia, Washington 98504-2525 • (360) 725-4000  
www.commerce.wa.gov

May 21, 2014

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

RE: Proposed 2015 Comprehensive Plan Update including: Draft Comprehensive Plan, Draft East Sumner Neighborhood Plan, Municipal Code Update, Transportation Plan, Capital Facilities Plan, Supplemental Environmental Impact Statement (Draft SEIS), and East Sumner

Dear Mr. Windish

Thank you for sending Growth Management Services the proposed amendments to Sumner's comprehensive plan and development regulations that we received on Feb 24, 2015, and processed with Material ID No. 21068

We especially like the following:

- Sumner undertook a major effort to update and rewrite the East Sumner Neighborhood Plan. This plan allows for multi-family, mixed-use developments, along with pedestrian oriented business and improved road connectivity. It envisions a commercial center at a neighborhood scale which complements, rather than competes with, the downtown commercial area. 4A-1
- The East Sumner Neighborhood Plan proposes a wetland mitigation bank to support development and new roadways. This proposal would create a new, high quality wetland mitigation bank that contributes to the wetland resources in the Salmon Creek watershed. This ultimately allows for development to meet the region's population demands, while improving the wetland corridors ecological functions by focusing on those areas with the most ecological significance. 4A-2
- The plan consistently promotes multi-modal transportation and integrates this planning approach well through the Land Use, Transportation, Community Character, and Parks and Recreation Elements. 4A-3

Mr. Ryan Windish, Planning Manager

May 21, 2014

Page 2

- The plan includes a policy to identify and catalog property owned by the city that is suitable for development of affordable housing for very-low to moderate income households. Inventory is provided to Department of Commerce annually. 4A-4

We have concerns about the following that you should address before you adopt your plan and development regulation amendments:

- The Housing Element does not contain an inventory and analysis of existing and projected housing needs (a brief breakdown of housing exists in the Transportation element – by TAZ, and on pg. 31 of the Capital Facilities Plan). The SEIS contains a more detailed breakdown and analysis of existing and projected needs. You may want to make a determination if material in an EIS is sufficient, or if it should be located in the plan as well, as this is the case for other elements as well. The Department of Commerce Housing Guidebook contains helpful tips and suggestions and is available at: 4A-5

[http://www.commerce.wa.gov/Documents/00\\_Housing\\_Guidebook\\_all\\_chapters.pdf](http://www.commerce.wa.gov/Documents/00_Housing_Guidebook_all_chapters.pdf)

- The Water System Plan, a component of the Capital Facilities Plan, uses a planning horizon of 2009 – 2029 (Table 8.1) and is inconsistent with the rest of the plan. For internal consistency, horizon for the water system plan should be extended to 2035 before you adopt. 4A-6

Potable Water System Facilities (Capital Facilities Plan pg. 47) appears to be based on a dated 2009 Water System Plan. The 2009 plan indicated that the water source would be insufficient to meet peak daily demand by the end of 2012. However, the 2009 water plan notes that “through a series of planned source improvements, new interties, new source construction and water right transfers and storage improvements, the shortfall will be filled and adequate storage capacity projected through 2020. This still does not cover the 20 year planning horizon of the plan. We recommend that you consider water conservation tools in combination with other strategies as a means of meeting the demand for water. Effective conservation measures may help meet some of your needs without more expensive investments in new capacity.

Sanitary Sewer analysis does not appear to be based on population projections. It refers generally to serving unserved areas of the UGA. The Sanitary Sewer Plan listed recommended improvements to correct capacity deficiencies in the collection system resulting from existing peak-day flow volumes. A few of these have been completed but most are pending and some have been cancelled. Adequate public facilities in urban areas is essential to support growth and this includes sanitary sewer systems and public water service. The service provided must be adequate to allow development at urban densities consistent with the land use element [WAC 365-196-320(1)(D)]. 4A-7

Helpful resources for Capital Facilities planning could be found at the following Department of Commerce website:

Mr. Ryan Windish, Planning Manager

May 21, 2014

Page 3

<http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Capital-Facilities/Pages/default.aspx>

- Natural Gas & Electric Facility map and Telephone Facility map (Utility Element pg. 127 & 128) do not appear to indicate any proposed facilities, nor did the element discuss the capacity of the facilities in detail. While this may have been addressed in the EIS, this requirement needs to be addressed in the capital facilities plan. 4A-8
- Fire Facilities section of the Capital Facilities Element at pg. 57 indicates that the CFP is in the process of being updated because a recent levy failed to pass in the East Pierce Fire District. Please clarify whether that update is included in this 2015 periodic update. 4A-9
- Public School Facilities only provides a 6 year timeframe. Please work with your school districts to include a forecast of projected need and revenues for the planning period consistent with other elements of your plan. 4A-10
- The plan monitoring and amendment Goal 1.4 (pg. 40) states “would review and revise the Comprehensive Plan on a 10 year cycle”. This should be changed to 8 year cycle per RCW 36.70A.130.5(a) 4A-11
- A review of BAS resulted in recommendation to expand stream and wetland buffers; however, only wetland buffers are being expanded. Please review stream buffers and expand where necessary. 4A-12

We have some suggestions for strengthening your plan and development regulation amendments that we encourage you to consider either in these or future amendments: 4A-13

- A review of BAS resulted in recommendation to expand steam and wetland buffers; however, it seems only wetland buffers are being expanded 4A-14
- The City takes a new approach to wetland buffers. Because this is a new approach, you might consider contacting the Department of Ecology to ensure that they don't have any concerns particularly as the E. Sumner Neighborhood Plan envisions a lot of new development in areas constrained by wetlands. 4A-15
- The Finance and Implementation Program of the Transportation Plan is blank (pg. 342) and says “To Be Updated”. Please fill in the blank before adoption. 4A-16
- The introductory section of the plan (pg. 5), references 13 rather than 14 planning goals even though 14 goals were listed in the plan. Please change this sentence to read 14 goals as RCW 36.70A.480 passed in 1995 added Shoreline Master Program as the 14th GMA planning goal. 4A-17

Mr. Ryan Windish, Planning Manager

May 21, 2014

Page 4

Congratulations to you and your staff for the good work these amendments represent. If you have any questions or concerns about our comments or any other growth management issues, please contact me at (360) 725-3056. We extend our continued support to the City of Sumner in achieving the goals of growth management.

Sincerely,

Ike Nwankwo  
Western Washington Regional Manager  
Growth Management Services

:lw

cc: Jeffrey Wilson, AICP, Senior Managing Director, Growth Management Services  
David Andersen, AICP, Eastern Region Manager, Growth Management Services  
Ike Nwankwo, Western Region Manager, Growth Management Services  
[Add State Agencies](#)



April 16, 2015

Ryan Windish  
 Planning Manager  
 Sumner City Hall  
 1104 Maple Street, Suite 250  
 Sumner WA 98390

**Subject: PSRC Comments on Draft Sumner Comprehensive Plan Update**

Dear Mr. Windish,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the City of Sumner 2015 Comprehensive Plan update. We recognize the substantial amount of time and effort invested in this plan, and appreciate the chance to review it while in draft form. This timely collaboration helps to ensure certification requirements are adequately addressed and certification action can be taken by PSRC boards after adoption.

We would like to note the many outstanding aspects of the draft plan. Several particularly noteworthy aspects include:

- The plan's commitment to sustainability, including policies that promote the efficient use of resources through the use of natural drainage, indigenous landscaping, energy efficient siting and building construction, and recycling. ← 5-1
- The plan's focus on developing a compact, vibrant, pedestrian-oriented town center. ← 5-2
- The housing needs assessment, which does an outstanding job of characterizing the gap in affordability for Sumner residents. By numerically characterizing the need, the city can accurately plan for and monitor outcomes for households at all income levels. ← 5-3
- Policies and provisions in the plan that encourage a multi-modal transportation network and provide alternatives to driving alone. ← 5-4
- The plan's many policies addressing Transportation 2040's physical design guidelines, including policies calling for the city to monitor the needs for downtown parking and developing methods for providing attractive, safe, accessible, effective and well utilized parking within the town center. In town centers in particular, managing parking can have many benefits. The parking management information in PSRC's Planning for Whole Communities Toolkit may be helpful in planning for parking (<http://www.psrc.org/growth/wctoolkit/parking-management/>). The right size parking project provides additional information on parking supply and management (<http://metro.kingcounty.gov/programs-projects/right-size-parking/>). ← 5-5
- The plan's provisions for efficient and innovative stormwater facilities such as regional facilities that support infill development. These strategies can help reduce the need for individual on-site ponds and facilities, provide development incentives, encourage efficient use of land, and reduce overall facility maintenance costs. ← 5-6

- The plan’s support for the preservation and growth of the manufacturing/industrial center by encouraging the concentration of manufacturing and industrial uses, working with funding partners to provide critical infrastructure, and restricting incompatible land uses. ← 5-7

The draft comprehensive plan advances regional policy in many important ways. There are some items, however, that should be addressed before the plan is finalized:

- VISION 2040 calls for local plans to include a context statement that describes how the plan addresses regional policies and provisions adopted in VISION 2040. Examples of context statements are provided in PSRC’s [Plan Review Manual](#), page 2-1. PSRC staff is also available to provide examples adopted in local comprehensive plans. ← 5-8
- The multicounty planning policies in VISION 2040 and the strategies in Transportation 2040 call for reducing greenhouse gas emissions and adapting to impacts related to climate change. See page 42 of VISION 2040 for an overview of climate change and related policies and page 34 in Transportation 2040 for information on the four-part greenhouse gas reduction strategy (land use, user fees, choices, and technology). The plan already includes some policies that support positive actions to reduce greenhouse gases, such as promoting transit and increasing nonmotorized transportation options. However, the plan could be strengthened by directly addressing the climate change-related policies (MPP-En-20-25) and adding more specific provisions the plan. ← 5-9
- A few comments relate to land use assumptions in the plan.
  - The plan should document how all elements of the comprehensive plan, implementing development regulations, and financing plans, are aligned with the land use assumptions. ← 5-10
  - The land use element should clearly demonstrate how zoned development capacity can accommodate the city’s extended growth targets. Alternative 1 in the draft plan, with zoning regulations as documented in the draft, does not provide adequate capacity to accommodate the land use assumptions. ← 5-11
  - The land use assumptions for employment in Alternatives 2 and 3 in the draft plan appear to significantly exceed the employment targets adopted in the countywide planning policies. To ensure the city’s comprehensive plan remains coordinated and consistent with countywide, regional and special district planning, the city should clarify and provide a rationale for the land use assumptions in relation to the adopted growth targets, including the role of the proposed manufacturing/industrial center in accommodating employment growth. ← 5-12
- In the transportation element, the city should identify SR 410 and SR 162 as state-owned facilities that are designated as Highways of Regional Significance. In addition, the city should reflect the LOS adopted by PSRC and WSDOT for these facilities. Information on these facilities and LOS can be accessed at: <http://psrc.org/transportation/t2040/los/>. ← 5-13
- Please add the city’s 20-year project list, including cost estimates and funding capability, to the transportation or capital facilities element. ← 5-14
- The transportation and other plan elements have many policies supportive of walking, biking and transit. The Growth Management Act requires level of service standards for all locally owned arterials and transit routes, and the MPPs call for other modes, such as biking and walking to be addressed as well. This will help with the evaluation of needs when comparing the inventories to the standards, as well as multi-modal concurrency requirements. The Washington State Department of Commerce’s Transportation Element Guidebook has information on how to set ← 5-15

level of service standards and identify system needs (pages 143-150 and 183-189) (<http://www.commerce.wa.gov/Documents/GMS-Transportation-2012.pdf>).

- The plan addresses disaster preparedness through public education and facility design. Consider adding a transportation planning aspect to this policy to address MPP T-8: *Protect the transportation system against disaster, develop prevention and recovery strategies, and plan for coordinated responses.* ← 5-16
- The plan recognizes the importance of serving new development with sanitary sewer systems in Policy 1.8.2, as does VISION 2040. To be more consistent with MPP-PS-9, consider adding language addressing standards and maintenance plans for alternative technologies. MPP-PS-9: *Serve new development within the urban growth area with sanitary sewer systems or fit it with dry sewers in anticipation of connection to the sewer system. Alternative technology to sewers should only be considered when it can be shown to produce treatment at standards that are equal to or better than the sewer system and where a long-term maintenance plan is in place.* ← 5-17
- PSRC applauds the accountability measures built into the Housing Element, such as housing policy 2.6. Since many housing policies appear to rely on the adoption of a housing strategy to address housing needs in Sumner, the city should consider adding a short discussion of the content of housing strategy plan, including a timeline for adoption and implementation. ← 5-18
- Policy 2.3.3 recommends consideration of several tools that can be used to assist development of affordable housing in the town center. PSRC suggests strengthening the policy language to ensure implementation. ← 5-19

PSRC has resources available to assist the city in addressing these comments. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found at <http://www.psrc.org/growth/planreview/resources/>.

Thank you again for working with us through the plan review process. There is a lot of excellent work in the draft and we are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information, please contact me at 206-464-6360 or [eharris@psrc.org](mailto:eharris@psrc.org).

Sincerely,



Erika Harris  
Associate Planner  
Growth Management Planning

cc: Review Team, Growth Management Services, Department of Commerce

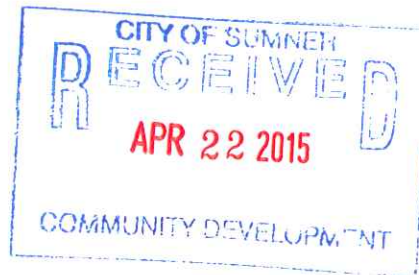


# Pierce County

## Public Works and Utilities

2702 South 42nd Street, Suite 201  
Tacoma, Washington 98409-7322  
(253) 798-7250 • Fax (253) 798-2740

Brian J. Ziegler, P.E.  
Director  
Brian.Ziegler@co.pierce.wa.us



April 9, 2015  
WP 60936

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

Re: City of Sumner Draft Comprehensive Plan, East Sumner Neighborhood Plan and Proposed Zoning Map Amendments

Dear Mr. Windish:

The Pierce County Surface Water Management Division (SWM) appreciates the opportunity to comment on the City of Sumner Draft Comprehensive Plan 2015 Update and proposed zoning amendments. We have reviewed the documents and have the following comments:

1. In a letter dated January 30, 2015, we expressed our concern for the proposed rezone (PLN-2015-0007) of properties adjacent to the White River from agriculture to residential protection. We are strongly opposed to this zoning change. The thirteen, mostly city-owned properties (102 acres), are located within or very close to the County mapped floodway. Changing to a zone that allows residential structures in the floodway puts people and structures at risk to flood hazards. 6-1

2. We are concerned about the proposed development of the "East Sumner Neighborhood" (Draft Comprehensive Plan Vol. 1, pages 167 – 217). The Plan proposes significant development in an area known to have a high water table, numerous wetlands and periodic flooding. We support the proposed restoration of Salmon Creek; however, we are concerned development in this area cannot be adequately protected from flood hazards and increased stormwater runoff. 6-2

3. The Draft Environmental Impact Statement (EIS) (Vol. 11, page 26) states all three alternatives provide opportunity for development in the floodplain with potential impacts. The EIS states the proposed zero rise measures will ensure future development will not contribute to the flood zones of downstream properties. The zero rise measures should also assure no impacts to upstream and cross stream properties, not just downstream. 6-3

4. We are concerned that Best Available Science (BAS) is not being used for all critical area regulations. Per the report, *City of Sumner: Best Available Science Review and* 6-4





*Recommendations for Updating Critical Area Regulations*, dated February 2015, prepared by Grette and Associates (Vol. 1, page 507), there are a number of BAS recommendations not proposed for adoption. Most notably, stream buffer widths should be increased to meet BAS, as recommended in the report (Vol. 1, page 536).

Thank you for the opportunity to provide input. Please contact Teresa Lewis, Senior Planner at (253)798-2494 or [tlewis1@co.pierce.wa.us](mailto:tlewis1@co.pierce.wa.us).

Sincerely,



Anne-marie Marshall-Dody, PWM, CFM  
Planning and Programming Manager, Surface Water Management

cc. Harold Smelt, Manager, Surface Water Management  
Tony Fantello, Maintenance and Operations Manager, Surface Water Management  
File

AMMD:TL:dr

**Ryan Windish**

---

**From:** Amy Pow <APow@tpchd.org>  
**Sent:** Wednesday, April 15, 2015 2:57 PM  
**To:** Ryan Windish  
**Cc:** Frank DiBiase  
**Subject:** Draft SEIS Comments from TPCHD  
**Attachments:** TPCHD Comments on Sumner Draft SEIS.pdf

Hi Ryan,

Thanks for giving the Health Department a chance to review your well-written draft SEIS. We will be submitting a signed letter from Dr. Anthony Chen to support your great effort before the close of next Monday.

Since I will be attending the APA conference later this week, let me pass you now my comments for your consideration. Are you heading out to the conference this weekend? Hope to catch up with you there.

Thanks,  
Amy

*Amy Pow, MCIP*

Principal Planner

Built Environment Program

(253) 798-6456 • [apow@tpchd.org](mailto:apow@tpchd.org)

[www.tpchd.org/PlanningForHealthyCommunities](http://www.tpchd.org/PlanningForHealthyCommunities)

[www.tpchd.org/HealthyCommunityPlanningToolbox](http://www.tpchd.org/HealthyCommunityPlanningToolbox)

*Shaping Sustainable and Smart Built Environments to Support Healthy Communities*



## Tacoma-Pierce County Health Department Comments on Sumner Draft SEIS

The quality of life and the health and well-being of those who live, work and play in Sumner are affected by how neighborhoods are built and whether people can fairly access services, facilities and amenities.

To assist your assessment of environmental impacts to incorporate health, the Health Department offers an array for mitigation measures and policies for comprehensive plans in this [Guide](http://www.tpchd.org/files/library/a6bd730e70512250.pdf) ([www.tpchd.org/files/library/a6bd730e70512250.pdf](http://www.tpchd.org/files/library/a6bd730e70512250.pdf)).

7-1

In general, those who call Sumner home have experienced a higher rate of obesity and chronic heart disease; and a higher mortality rates due to lower respiratory disease, heart disease, accident, diabetes and suicide. Here's the [profile of your city](http://www.tpchd.org/files/library/ad1555e2991b4877.pdf) ([www.tpchd.org/files/library/ad1555e2991b4877.pdf](http://www.tpchd.org/files/library/ad1555e2991b4877.pdf)).

7-2

To holistically address health, we would like to focus a few comments on the proposed city-wide policy changes (P. 2-24 to 2-27) for your consideration in the final comprehensive plan update:

### Land Use Element:

- Agricultural land and TDRs: Farming and agriculture can strengthen a local food economy. Are there other areas where more intensive development may occur, such as infill, to save prime farmland soils for their best use in the long term? 7-3
- Historic and cultural preservation: We support this element as it can enhance a sense of place for people to relate to the past and appreciate culture and heritage. 7-4

### Parks and Open Space Element:

- Small gathering places downtown: Consider improving connectivity within downtown by creating a "linear urban park system" with landscaped urban trails connecting small gathering places for people to interact, have fun and stay healthy. 7-5
- Parks Level of Service: Consider developing an LOS to ensure walkability and accessibility, such as "Access to a park, open space or trail within ½ mile of residence". 7-6

### Environment Element:

- Climate change/flooding and other hazards: Climate change impacts human health and safety. We encourage the City to consider policies that carry long-term impacts. Consider the introduction of "applying the 500-year flood plain to limit siting of certain essential and critical services, including hospitals and major medical centers". For Sumner, emergency preparedness is especially critical given volcanic and liquefaction hazards. People with limited mobility, transit-dependent, children and elderly are especially vulnerable. 7-7
- Storm water policies: Low impact development practices should also be required for retrofitting old developments, besides new ones. 7-8

- Air policies: Local air quality impacts should be mitigated by investments in improving connectivity, mobility and transportation choices, including transit, bicycling and walking. Consider policies for particulate matter mitigation, such as requiring trees and other barriers between busy roadways and schools, residential areas and other places with vulnerable children and adults. (See Guide above). Particulate matter decreases with distance from busy roadways, and due to trees and concrete noise barriers. 7-9

#### Housing Element:

- “Single family” vs “single detached”: To promote mental health and well-being, it’s essential to provide some flexibility in the comprehensive plan policies and regulations to allow certain types of “missing-middle housing”, such as duplex, triplex or quadplex, which permits more than one single family in a detached form of dwelling unit. The “number of families” allowable under the built form of a “detached dwelling” should not be the criterion used to protect the character and scale of traditional neighborhoods. We encourage the City to consider introducing the term “single-detached housing/dwelling or neighborhood” in place of “single-family housing or neighborhood”. Besides, providing more middle-housing choices within traditional neighborhoods will offer millennials an affordable opportunity to stay closer to their parents, and seniors to age in place/existing neighborhood. 7-10
- Condominiums: While we understand the market reality of eliminating condos, it is noted this type of home ownership is no longer encouraged given this elimination. Access to a diverse range of housing choices (including a mix of homeownership choices) is key to creating mixed-income and inter-generational neighborhoods. 7-11
- Adequate housing and affordable housing: Given that the residents of Sumner have a lower median household income (almost \$10,000 less than the County and State) and a higher percentage (almost 2% higher) of single householders with children under 19 years of age living under poverty, the City should try its best to provide affordable housing within the financial reach of all income groups. In order to discourage involuntary displacement, we suggest a policy of “Ensuring no net loss of affordable housing upon redevelopment/full development. Providing a sufficient amount of affordable housing units to address the housing needs of low-income groups”. 7-12

#### Transportation Element:

- Consider strengthening some policy language to connect housing with transportation, such as the creation of living-wage jobs within a reasonable walking distance to affordable housing or along major corridors; or the use of a combined “transportation and housing cost burden” yardstick to address the larger issue of affordability and accessibility. 7-13
- Transit: Address the mobility needs of those with special needs. This may become more important as the population of Sumner continues to age. Sumner has a higher percentage of seniors over 75 years old, and this vulnerable group of seniors may soon be less able to travel on their own. 7-14

- Health living: We appreciate this policy. Would like to add the words “healthy food choices, parks and open space and neighborhood essential services through” before “walking..” 7-15
- Trail plan update: Ensure the connectivity between on-street and off-street trails. 7-16

Capital Facilities Element:

- Capital Facilities Plan: Consider the introduction of a set of project prioritization criteria to coordinate city-wide improvements and new projects to address underserved or neglected neighborhoods. Often times, those living in underserved or low-income neighborhoods do not have fair access to amenities and opportunities that make health living an easy choice for them. As a result, health disparities exist across different neighborhoods. 7-17

Family and Human Services Element:

- Healthy living policies: Besides the policies contained in Tacoma-Pierce County Health Department’s [Healthy Community Planning Toolbox \(www.tpchd.org/environment/planning-healthy-communities/healthy-community-planning-toolbox/\)](http://www.tpchd.org/environment/planning-healthy-communities/healthy-community-planning-toolbox/) and those highlighted above, we look forward to working with the City to develop implementation strategies to make Sumner a healthier place to live, work and learn. 7-18

Final comment on CPP Health and Well Being Element (P. 3-97):

- We applaud the intent to update policies to promote physical health (such as physical activity and healthy eating). Also ensure that policies are in place to nurture social, emotional and mental well-being (such as parks, open space and recreation, community character, public arts, heritage and culture, affordable housing and diverse housing/transportation choices). We strongly encourage the consideration of health-in-all-policies, and provide assistance in implementing those policies. 7-19

Please include Tacoma-Pierce County Health Department in your distribution and notification list. Thank you for giving the Health Department a chance to review your draft SEIS.

April 20, 2015

Planning Commission  
City of Sumner

Re: Draft Comprehensive Plan Update/SEPA Review Comments

Dear Planning Commissioners:

Thank you for the opportunity to review your draft comprehensive plan and SEPA document.

Health starts where we live, learn, work and play. Comprehensive plans give a community the opportunity to put this principle into action.

Last year, Tacoma-Pierce County Board of Health passed a resolution (No. 2014-4416) declaring that the health of our neighborhoods impacts people's health and well-being. The Board also resolved that integrating health into local comprehensive plan policies can create healthy built environments to promote health and well-being, economic vitality and health equity. 8-1

We stand ready to partner with you in your efforts to improve health outcomes through planning. During the draft plan review stage, we encourage your jurisdiction to use our self assessment tool ([www.tpchd.org/files/library/87189ac3d23467ab.pdf](http://www.tpchd.org/files/library/87189ac3d23467ab.pdf)) to assess how your draft plan integrates health and the "Health and Well-being" element of the Countywide Planning Policies. This assessment can help your jurisdiction document successes and identify opportunities for future action. If you need help on applying the tool, please contact Amy Pow at [apow@tpchd.org](mailto:apow@tpchd.org). 8-2

We are also available to help you develop implementation strategies and identify performance measures to make your jurisdiction healthier. Please let us know if we can assist in this regard. 8-3

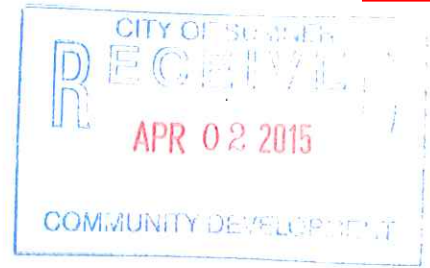
We look forward to partnering with you to improve the health and quality of life of all who live, learn, work and play in your community.

Yours sincerely,



Anthony L-T Chen, MD, MPH  
Director of Health

cc: Ryan Windish, Planning Manager



April 2, 2015

To: Ryan Windish, Planning Manager, 253-299-5524  
Re: Environmental Chapter of Sumner's Comprehensive Plan 2015 update

The League of Women Voters of Tacoma-Pierce County urges the Planning Commission to include a reference to the Lower White River BMA Stewardship plan in the City of Sumner's Comprehensive Plan. 9-1

In 2010 to 2011 our local League conducted an extensive study of Land Use in Pierce County as it relates to biodiversity conservation (found on our website: [lwvwa.org/tacoma](http://lwvwa.org/tacoma)). Sumner participated in this study and you will find the results on pages 17 to 20.

In May 2011, after a series of meetings giving the report a full reading and discussion, our membership came to a consensus position. Parts of this consensus relate directly:

"We support

1. Adopting policies and regulations that preserve and restore areas of rich native biodiversity,
2. Managing population and economic growth in a way that retains wildlife corridors and prevents native habitat fragmentation;
3. Offering incentives to landowners who use responsible land stewardship;
4. Supporting non-governmental organizations' biodiversity missions;
5. Inserting the word "biodiversity" into regulatory language wherever appropriate"

The full consensus position is included and our study and position are available to the public on our website ([lwvwa.org/tacoma](http://lwvwa.org/tacoma).)

Thanks you for your consideration.

Paula Eismann  
Co-president  
League of Women Voters Tacoma-Pierce County  
253-272-1495

## LWVT-PC Land Use Consensus Position

The LWVT-PC finds that land offering habitat for diverse native wildlife benefits the general public. It confers multiple ecosystem services to communities throughout Pierce County, including resilience to natural disasters. We support:

1. Adopting policies and regulations that preserve and restore areas of rich native biodiversity,
2. Managing population and economic growth in a way that retains wildlife corridors and prevents native habitat fragmentation;
3. Offering incentives to landowners who use responsible land stewardship;
4. Supporting non-governmental organizations' biodiversity missions;
5. Inserting the word "biodiversity" into regulatory language wherever appropriate;
6. Aligning county zoning with biodiversity conservation; and
7. Pursuing the work of the Pierce County Open Space Task Force.

The LWVT-PC finds that it makes more economic sense to protect resource areas than to rebuild and restore ecosystem services damaged by poor development decisions. We support:

1. Funding staff positions and/or staff time for biodiversity conservation efforts and for development and enforcement of land use regulation;
2. Educating citizens about the value of sustaining native biodiversity;
3. Educating public maintenance staff on the use and care of plants that benefit wildlife;
4. Acquiring and restoring land to provide wildlife corridors;
5. Providing incentives for land-use development that preserves native biodiversity.

The LWVT-PC finds that the work of retaining biodiversity is not reserved for rural areas and open spaces alone. We support residents in urban and suburban areas:

1. Educating themselves and their elected representatives on biodiversity conservation in land use; and
2. Providing native wildlife habitat in urban spaces.

The LWVT-PC finds that protecting endangered species, imposing pollution controls, managing storm water runoff, reducing the impact of construction, providing public open spaces, and conducting sustainability campaigns all help conserve native biodiversity. We support:

1. Protecting areas that provide significant ecosystem services through stewardship programs and incentives to refrain from development;
2. Designating buffer zones, greenbelts, or open spaces planted with native species where development has destroyed habitat.
3. Planting native species wherever possible when designing or redesigning public spaces.



April 2, 2015

Planning Commission  
City of Sumner  
1104 Maple Street, Suite 200, Sumner, WA 98390

Planning Commissioners:

This letter is in reference to the Sumner Comprehensive Plan, specifically regarding the proposed option for the East Sumner area to have zoning for up to forty dwelling units per acre. On behalf of the Master Builders Association of Pierce County (MBA Pierce), thank you for your consideration of these comments voicing support for this provision.

MBA Pierce and its members support the proposed option which would increase the number of dwelling units allowed per acre along with providing mixed use in the area. Sumner has a central location and access to light rail that links into King County. Providing high density multi-family housing would appeal to local developers and the market would be able to sustain this type of development due to the location of the city, jobs, new companies moving into Sumner and light rail for those having to commute through Pierce and King County. This provision within the Comprehensive Plan would allow Sumner to attract commuting professionals, students looking for cheaper housing outside of King County and small families that are not yet ready to pursue single-family housing.

10-1

MBA Pierce asks that the Planning Commission recommend and forward this provision for forty dwelling units per acre to the City Council for consideration.

Please contact MBA Pierce regarding issues that would affect the housing industry in Sumner. Thank you for your efforts in supporting this provision within the Comprehensive Plan.

Sincerely,

Jeremiah J. Lafranca, Government Affairs Director

Cc: Ryan Windish

www.mbapierce.com



April 2, 2015

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

Subject: 2015 Comprehensive Plan Update

Dear City of Sumner Planning Commission:

I am writing on behalf of NatureMapping Foundation to express our support for the amendment to the City of Sumner’s Comprehensive Plan to include the following language.

II. VISION: *“The City has reserved lands in a natural state along rivers and wetlands for passive enjoyment and to benefit fish and wildlife and biodiversity.”* 11-1

III. VALUES: *“We recognize the biologically rich and diverse area adjacent to the White River as a unique and special place and strive to protect and restore these areas to maintain and increase biodiversity. We recognize the benefits and importance of a healthy and functioning natural environment to the continued prosperity and quality of life in the city and region.”* 11-2

ENVIRONMENT ELEMENT: The amendment to goal three.  
*“Protect and enhance unique, valuable, and critical plant and wildlife habitat and promote bio-diversity.”*

Biodiversity has been defined as the existence of a wide variety of plant and animal species in their natural environments. Maintaining biodiversity is economically valuable because it provides breathable air, drinkable water, food, pollution and pest control, and resilience after natural catastrophes, such as floods and drought.

Additional benefits of planning for biodiversity conservation include:

- Protection for remaining high-quality land cover important for fish and wildlife.
- Implements Growth Management Act requirements for Habitat Conservation Areas.
- Provides regional connectivity network for fish and wildlife dispersal and migration.
- Establishes a proactive approach to help avoid future listings under ESA.

In 2000 a Biodiversity Network consisting of 16 Biodiversity Management Areas (BMA) was created in Pierce County. These BMA’s are the “best of the best” ecosystems. The Network includes the Lower White River BMA, which partially lies within the City of Sumner’s boundaries.

11-3



Biodiversity is a top priority for NatureMapping Foundation. We strongly support the City of Sumner's commitment to conserve biodiversity in coordination with new development, especially in the Lower White River BMA, which has already been identified as an area of extreme importance. Please consider supporting these amendments that encourage protecting biodiversity.

11-4

Sincerely,

A handwritten signature in black ink that reads "Karen M. Dvornich". The signature is written in a cursive style with a large, prominent "K" and "D".

Karen Dvornich  
Director  
NatureMapping Foundation  
PO Box 946  
Waterville, WA 98858  
253-347-4389  
[vicon@uw.edu](mailto:vicon@uw.edu)  
[www.naturemappingfoundation.org](http://www.naturemappingfoundation.org)



City of Sumner Planning Commission  
Ryan Windish, Planning Manager  
1104 Maple Street Suite 250  
Sumner, WA 98390

April 20, 2015

Re: 2015 Comprehensive Plan Update

I am writing on behalf of The Pierce County Biodiversity Alliance to express our support for the amendments to the City of Sumner's Comprehensive Plan which includes language to recognize the importance of the preservation of biodiversity.

We thank you for the language that was incorporated in the Vision and Values sections and the amendment to goal 3 in the Environmental Element.



12-1

We want to strongly recommend that in addition to the above, the following specific actions be added to the Environmental Element to provide a better understanding of the meaning of goal 3 (i.e. ...promote biodiversity):

- *The City shall use **The Lower White River BMA Stewardship Plan - (Dec 2009)**. (See Appendix x.) as a reference to identify threats and possible conservation strategies to achieve this objective. Add plan as an appendix to the Comprehensive Plan*
- *The City shall partner with the Pierce County Biodiversity Alliance to complete Chapter XII (City of Sumner) of the Lower White River BMA Stewardship Plan .*
- *The City shall identify partners and volunteer citizen groups who can advance the City of Sumner Lower White River BMA Stewardship Plan*
- *The City shall coordinate with other jurisdictions within the Lower White River BMA (Auburn, Pacific, Buckley, Pierce County, King County, Muckleshoot Tribe of Indians) and meet periodically to align goals, objectives and strategies, and monitor progress.*



12-2



12-3



12-4



12-5

We thank you for the opportunity to present these ideas for your consideration.

Linda T. Burgess  
253-863-1860  
Pierce County Biodiversity Alliance

*Dedicated to conserving the biodiversity of Pierce County*

ref: letter '2015 Comprehensive Plan Update' November 6, 2014 attached

*Dedicated to conserving the biodiversity of Pierce County*



City of Sumner Planning Commission  
Ryan Windish, Planning Manager  
1104 Maple Street Suite 250  
Sumner, WA 98390

November 6, 2014

Re: 2015 Comprehensive Plan Update

**Background:**

Biodiversity has been defined as the entire living fabric of the planet. Maintaining genetic and biological diversity, “biodiversity,” is economically valuable because it provides the basis for most other ecosystem functions: breathable air, drinkable water, food for nourishment, pollution and pest control, providing resilience after natural catastrophes such as floods, storms, fires, and drought. When we alter environmental conditions, these services are often lost and must be replaced by costly built alternatives. Biodiversity planning is a holistic approach that identifies land areas (habitats) that provide for a biologically diverse representation of species. This planning method considers long-term ecosystem health and establishes a goal of maintaining adequate habitat to ensure the continued viability of a diversity of species within an ecoregion. The Pierce County Biodiversity Alliance (PCBA) has been involved in the integration of biodiversity habitat protection at the local level since 1997. Collaboration began with a partnership between the Washington GAP Analysis Program at the University of Washington and the Washington Department of Fish and Wildlife to develop a methodology to apply coarse scale analysis of biodiversity habitat needs to the Growth Management Act comprehensive open space planning process. The result of this planning process was the creation of a Biodiversity Network for Pierce County comprised of 16 biologically rich areas (Biodiversity Management Areas or BMAs) and their connecting corridors. The area located on both sides of the White River from Buckley to Sumner was recognized as one of those 16 unique places (identified as the Lower White River BMA).

In 2006, the PCBA embarked on a project to educate and engage the communities and land managers along the Lower White River BMA about their biodiversity. As part of that outreach, two 24-hr surveys, called Bioblitzes, were conducted which paired local landowners and land managers with professional biologists. The goal was to validate the presence of a multitude of plant and animal species that had been predicted within the BMA while educating the community about the importance of this biologically rich area. That same community and the local jurisdictions were subsequently invited to participate in the creation of a stewardship plan for the Lower White River BMA. The results of both Bioblitzes and the ground-work for the stewardship plan can be found in the *Lower White River Biodiversity Management Area (BMA) Stewardship Plan -(Dec 2009)* (attached).

12-6

*Dedicated to conserving the biodiversity of Pierce County*

Each city jurisdiction managing land within the Lower White River BMA is identified separately within the draft Stewardship Plan. A draft section specific to the City of Sumner was prepared to be used as a template (see *Chapter XII – City of Sumner*, attached). One of the actions of this plan was to work with the City of Sumner to identify Comprehensive Plan amendments that incorporate biodiversity management goals and policies in subsequent updates. This communication serves to begin this dialog.

12-6  
Conti

## Possible Comprehensive Plan Updates:

Recognizing that:

- ▲ intact areas of such rich biodiversity are becoming increasingly rare and can easily become degraded,
- ▲ biodiversity is an excellent indicator that a community is operating in a sustainable fashion balancing its economic, social and environmental needs that will serve future generations, and
- ▲ biodiversity serves to preserve ecosystem services that help to minimize flooding, preserve clean water, provide recreational and wildlife viewing opportunities, and maintain a high quality of life necessary to maintain a vibrant community;

12-7

the PCBA has identified possible amendment opportunities for introducing biodiversity goals into the 2015 update cycle. These are shown below in *italics* as additions to the existing Comprehensive Plan language.

These are:

- ▲ Chapter II (Vision Statement) – Parks, Recreation and Open Space (p17)
  - The City has reserved lands in a natural state for passive enjoyment, *to preserve biodiversity* and to benefit fish and wildlife.
- ▲ Chapter III (Values) – The Values – Environment
  - The people of Sumner respect the environment in which we live and strive to reduce the impacts our activities have on the environment. We strive to protect the environment and replenish what we must take from it. *We recognize the biorich area adjacent to the White River as a unique and special place and strive to protect and restore biodiversity and the range of supporting habitats in order to enjoy the benefits of important ecosystem services critical to continued prosperity and quality of life in the City and Region. We examine ... our adults about the environment.*
  - Alternatively, introduce a new value entitled ' *Biodiversity*'  
*The people of Sumner recognize the biorich area adjacent to the White River as a unique and special place that has been demonstrated to sustain healthy populations of fish, mammals, birds, insects, reptiles, amphibians, and plant life which qualifies it to be designated as a Biodiversity Management Area. We strive to protect and restore biodiversity and the range of supporting habitats in order to enjoy the benefits of important ecosystem services such as clean water, natural flood control, climate regulation, and pollination critical to continued prosperity and quality of life in the City and Region.*
- ▲ Chapter IV (Element, Land Use Element) – Goals, Policies, and Objectives (p 24)
  - Add *1.x In cooperation with the City of Pacific review land use adjacent to the Lower White River Biodiversity Management Area to support the preservation of biodiversity ...*
- ▲ Chapter IV (Element, Community Character Element) – Introduction Goals and Policies (p65)
  - Add to 5.2 Promote the preservation of the natural terrain, *biodiversity*, drainage, and vegetation of the community.
- ▲ Chapter IV (Element Parks and Open Space) – Goals, Policies and Objectives (p70,72,73)
  - 1.8 Recognize the critical and unique environmental features in the community such as wetlands, streams, riparian corridors, *Biodiversity Management Areas*, significant archaeological ....

12-8

12-9

12-10

12-11

12-12

*Dedicated to conserving the biodiversity of Pierce County*

- 2.9 Work with other jurisdictions to establish open space corridors and linkages with other significant regional open spaces including the valley hillsides, *the Lower White River Biodiversity Management Area*, Puyallup/White River corridors, and the valley south of the City. 12-12  
Conti.
- 2.13 Seek to acquire the most significant parcels of property in order to protect hillside amenities, wetlands, farmlands, *Biodiversity Management Areas*, *river and stream corridors*...
- 2.14 Through implementation of the State Shore Management Act and City environmental regulations, protect wetlands, riparian corridors, streams and wildlife areas, *and Biodiversity Management Areas*.
- ^ Chapter IV (Element – Environment Element) – Goals, Policies, and Objective (p75)
  - Add *1.x Protect biodiversity and the full range of supporting habitats* 12-13
    - *1.x.1 The Lower White River Biodiversity Management Area must be protected in order to benefit from the important ecosystem services it provides such as clean water, natural flood control, climate regulation, and pollination critical to the continued prosperity and quality of life*
    - *1.x.2 The City shall use The Lower White River BMA Stewardship Plan - (Dec 2009). (See Appendix x.) as a reference to identify threats and possible conservations strategies to achieve this objective. Add plan as an appendix to the Comprehensive Plan*
    - *1.x.3 The City shall partner with the Pierce County Biodiversity Alliance to complete Chapter XII (City of Sumner) of the Lower White River BMA Stewardship Plan .*
    - *1.x.4 The City shall identify partners and volunteer citizen groups who can advance the City of Sumner Lower White River BMA Stewardship Plan*
    - *1.x.5 The City shall coordinate with other jurisdictions within the Lower White River BMA (Auburn, Pacific, Buckley, Pierce County, King County, Muckleshoot Tribe of Indians) and meet periodically to align goals, objectives and strategies, and monitor progress.*
- ^ Chapter IV (Element – Shoreline Master Program) - Conservation Element (p132)
  - 7.1 Objective: Through the use of best available science develop and implement siting criteria, design standards, and best management practices that will ensure the long term enhancement of unique shoreline features, natural resources and fish and wildlife habitat , *including the Lower White River Biodiversity Management Area*. 12-14
  - Highlight the Lower White River Biodiversity Area in the Shoreline Map

### Partnership Opportunities:

The PCBA welcomes the opportunity to partner with the City of Sumner:

- ^ to assist in introducing biodiversity into the Comp Plan 12-15
- ^ to complete Chapter XII the City of Sumner section of the Lower White River BMA Stewardship Plan
- ^ to identify funding opportunities, consulting partners, and volunteers within our watershed necessary to complete projects identified within the Stewardship Plan

We thank you for the opportunity to present these ideas for your consideration.

Linda T. Burgess  
 253-863-1860  
 Pierce County Biodiversity Alliance

*Dedicated to conserving the biodiversity of Pierce County*





City of Sumner Planning Commission  
Ryan Windish, Planning Manager  
1104 Maple Street Suite 250  
Sumner, WA 98390

April 24, 2015

Re: Questions raised at Planning Commission Study Session 4/23/15  
Submitted via email on 4/24/15

A couple questions about the Pierce County Biodiversity Alliance (PCBA) came up during yesterday's Planning Commission Study Session. Because there was no opportunity for public comment I could not answer them for you but thought they were important for you to know to help with your deliberations.

Who is the PCBA?

- ⤴ The PCBA is a group of individuals passionate about the role biodiversity plays in our quality of life and want to educate the public about stewardship opportunities to preserve the 16 areas that have been identified within Pierce County as being especially biorich. The founding group began work in 1997. The Alliance is not a government agency.
- ⤴ The members of the PCBA are either representatives of an organized group with aligned goals who volunteer their time and expertise or are citizen groups interested in biodiversity stewardship opportunities in their local communities.
- ⤴ The only paid staff is one biodiversity coordinator who is being funded by The Russell Family Foundation as part of their 'Puyallup Watershed Initiative' program - a 10 yr investment in the environmental and social health of the Puyallup Watershed (see pwi.org for more information).
- ⤴ The current active member organizations within the PCBA are:
  - ⤴ Tahoma Audubon
  - ⤴ University of WA, Nature Mapping Foundation
  - ⤴ Puyallup River Watershed Council
  - ⤴ Friends of the Lower White River
  - ⤴ Crescent Valley Alliance
  - ⤴ WA Dept of Fish & Wildlife
  - ⤴ Puyallup Watershed Coalition
  - ⤴ Metro Parks
  - ⤴ Forterra

13-1

When were the initial contacts of PCBA made with the City of Sumner?

*Dedicated to conserving the biodiversity of Pierce County*

- ⤴ June 2006: PCBA coordinated the BioBlitz with the City in order to inventory the bird species present on the Sumner golf course. The species observed were documented in the Lower White River BMA Stewardship Plan - (Dec 2009).
- ⤴ June 5, 2014: I introduced the PCBA to the Planning Commission during the public comment segment and communicated our intent to suggest possible biodiversity language to the 2015 Comp Plan.
- ⤴ Nov 12, 2014: Met with Ryan Windish to discuss biodiversity
- ⤴ Dec 4, 2014: I gave a short presentation about biodiversity and the PCBA during the public comment segment of the regular Planning Commission meeting and submitted a letter (Nov 6, 2014) with suggestions on possible opportunities to introduce specific biodiversity language within the 2015 Comp Plan Update
- ⤴ Mar 19, 2015 & April 2, 2015 I gave public testimony concerning biodiversity language added to draft 2015 Comp plan Amendments at the Public Hearings.

If there are any further questions that I can help with I will be pleased to do so.

Regards,

Linda T. Burgess  
253-863-1860  
Pierce County Biodiversity Alliance



**The Puyallup River Watershed Council**  
is a tax exempt  
501(c)(3) nonprofit  
Washington corporation

April 2, 2015  
Ryan Windish, Planning Manager  
City of Sumner  
Community Development Department  
1104 Maple Street, Suite 250  
Sumner, WA 98390

Subject: 2015 Comprehensive Plan Update

**Board of Directors**

- Katherine Appleyard
- Linda Burgess
- Patty Denny
- Kurt Fremont
- Mark Heckert
- Carrie Hernandez
- Jason Jordan
- Tom Kantz
- Russ Ladley
- Mark LaVergne
- Ryan Mello
- Mark Palmer
- Lorin Reinelt

Dear City of Sumner Planning Commission:

I am writing on behalf of the Puyallup River Watershed Council to express our support for the amendment to the City of Sumner’s Comprehensive Plan to include the following language.

II. VISION: *“The City has reserved lands in a natural state along rivers and wetlands for passive enjoyment and to benefit fish and wildlife and biodiversity.”*

14-1

III. VALUES: *“We recognize the biologically rich and diverse area adjacent to the White River as a unique and special place and strive to protect and restore these areas to maintain and increase biodiversity. We recognize the benefits and importance of a healthy and functioning natural environment to the continued prosperity and quality of life in the city and region.”*

14-2

ENVIRONMENT ELEMENT: The amendment to goal three.

*“Protect and enhance unique, valuable, and critical plant and wildlife habitat and promote bio-diversity.”*

Biodiversity has been defined as the existence of a wide variety of plant and animal species in their natural environments. Maintaining biodiversity is economically valuable because it provides breathable air, drinkable water, food, pollution and pest control, and resilience after natural catastrophes, such as floods and drought.

14-3

**Address**

c/o Mark Palmer  
City of Puyallup  
333 N. Meridian  
Puyallup, WA 98371

Additional benefits of planning for biodiversity conservation include:

- Protection for remaining high-quality land cover important for fish and wildlife.
- Implements Growth Management Act requirements for Habitat Conservation Areas.
- Provides regional connectivity network for fish and wildlife dispersal and migration.
- Establishes a proactive approach to help avoid future listings under ESA.

14-3  
conti.

In 2000 a Biodiversity Network consisting of 16 Biodiversity Management Areas (BMA) was created in Pierce County. These BMA's are the "best of the best" ecosystems. The Network includes the Lower White River BMA, which partially lies within the City of Sumner's boundaries.

Biodiversity is a top priority for the Puyallup River Watershed Council. We strongly support the City of Sumner's commitment to conserve biodiversity in coordination with new development, especially in the Lower White River BMA, which has already been identified as an area of extreme importance. Please consider supporting these amendments that encourage protecting biodiversity.

Sincerely,



Kurt Fremont

President

**Ryan Windish**

---

**From:** JOANNIE HILL <joannie\_hill@sumnersd.org>  
**Sent:** Wednesday, April 22, 2015 11:34 AM  
**To:** Ryan Windish  
**Subject:** Family and Human Services Element

Ryan,

Good afternoon! I just wanted to respond quickly to the draft you sent out of the Family and Human Services Element. Really, I wanted to commend you on the document/plan as it is well written and inclusive of all the elements that are truly needed to support a healthy community. Sumner really does a remarkable job at supporting it's citizens; which in turn creates that positive community feel that is directly associated with Sumner.

15-1

Specifically, I was pleased to see the support for the children, students/school district, and families as well as the support for mental health and substance abuse services.

15-2

Great job!

--  
Joannie Hill  
Sumner School District  
Sumner/Bonney Lake Family Center Coordinator



Adriana Hess Audubon Center  
2917 Morrison Road West  
University Place, WA 98466  
(253) 565-9278  
www.TahomaAudubon.org

April 2, 2015

Board of Directors

And Staff

Officers

Art Wang  
President

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

Martha Scoville  
Vice President

Subject: 2015 Comprehensive Plan Update

Geoff Lawrence  
Treasurer

Dear City of Sumner Planning Commission:

Ione Clagett  
Interim Secretary

I am writing on behalf of Tahoma Audubon Society, the Pierce County chapter of Audubon, to express our support for the amendment to the City of Sumner's Comprehensive Plan to include the following language.

Lloyd Fetterly  
Past President

Members at Large

II. VISION: *"The City has reserved lands in a natural state along rivers and wetlands for passive enjoyment and to benefit fish and wildlife and biodiversity."*

16-1

Jerry Broadus  
Javier Figueroa  
Bob Furman  
Nalani Linder  
Robert E. Mack  
Marjorie Shea  
Kris Sherman

III. VALUES: *"We recognize the biologically rich and diverse area adjacent to the White River as a unique and special place and strive to protect and restore these areas to maintain and increase biodiversity. We recognize the benefits and importance of a healthy and functioning natural environment to the continued prosperity and quality of life in the city and region."*

16-2

Board Member  
Emeritus  
Thelma Gilmur

ENVIRONMENT ELEMENT: The amendment to goal three.  
*"Protect and enhance unique, valuable, and critical plant and wildlife habitat and promote bio-diversity."*

16-3

Staff

Krystal Kyer  
Executive Director

Biodiversity has been defined as the existence of a wide variety of plant and animal species in their natural environments. Maintaining biodiversity is economically valuable because it provides breathable air, drinkable water, food, pollution and pest control, and resilience after natural catastrophes, such as floods and drought.

16-4

Paulette Peterson  
Membership &  
Outreach Director

Additional benefits of planning for biodiversity conservation include:

- Protection for remaining high-quality land cover important for fish and wildlife.
- Implements Growth Management Act requirements for Habitat Conservation Areas.
- Provides regional connectivity network for fish and wildlife dispersal and migration.
- Establishes a proactive approach to help avoid future listings under ESA.

In 2000 a Biodiversity Network consisting of 16 Biodiversity Management Areas (BMA) was created in Pierce County. These BMA's are the "best of the best" ecosystems. The Network includes the Lower White River BMA, which partially lies within the City of Sumner's boundaries.

Biodiversity conservation is a top priority for Tahoma Audubon Society. We strongly support the City of Sumner's commitment to conserve biodiversity in coordination with new development, especially in the Lower White River BMA, which has already been identified as an area of extreme importance. Please support these amendments that encourage protecting biodiversity.

16-4 continued

Sincerely,



Krystal Kyer  
Executive Director



March 24, 2015

Letter #16A

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

Sent via email: [ryanw@ci.sumner.wa.us](mailto:ryanw@ci.sumner.wa.us)

Re: 2015 Comprehensive Plan Update

Dear Sumner Planning Commission:

I am writing on behalf of American Rivers to express our support for the amendment to the City of Sumner’s Comprehensive Plan to include the following language.

II. VISION: *“The City has reserved lands in a natural state along rivers and wetlands for passive enjoyment and to benefit fish and wildlife and biodiversity.”*

III. VALUES: *“We recognize the biologically rich and diverse area adjacent to the White River as a unique and special place and strive to protect and restore these areas to maintain and increase biodiversity. We recognize the benefits and importance of a healthy and functioning natural environment to the continued prosperity and quality of life in the city and region.”*

16A-1

ENVIRONMENT ELEMENT: The amendment to goal three.

*“Protect and enhance unique, valuable, and critical plant and wildlife habitat and promote bio-diversity.”*

16A-2

American Rivers is a national conservation organization devoted to protecting wild rivers, restoring damaged rivers, and conserving a clean water supply for people and nature. We have had an office in the Puget Sound area since 1992, and in 2014 listed the White River as one of America’s Most Endangered Rivers™ due to fish passage problems at the Buckley diversion dam. We are also concerned about plans and pressure for floodplain development along the lower White River.

16A-3

In 2000 a Biodiversity Network consisting of 16 Biodiversity Management Areas (BMA) was created in Pierce County. These BMA’s are the “best of the best” of the county’s

16A-4



ecosystems. The Network includes the Lower White River BMA, which is located partially within Sumner.

Biodiversity is defined as the existence of a wide variety of plant and animal species in their natural environments. Maintaining biodiversity is economically valuable because it provides clean air and water, food, pollution and pest management, and resilience after natural catastrophes, such as floods and drought.

16A-4  
Cont.

Additional benefits of planning for biodiversity conservation include:

- Protection for remaining high-quality land cover and floodplains important for fish and wildlife, including threatened Puget Sound chinook, steelhead, and bull trout
- Implements Growth Management Act requirements for Habitat Conservation Areas
- Provides regional connectivity network for fish and wildlife dispersal and migration
- Establishes a proactive approach to help avoid future listings under the Endangered Species Act.

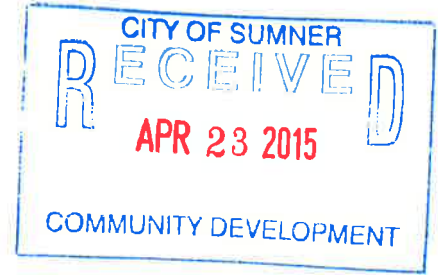
Protecting biodiversity in freshwater ecosystems and river corridors is a top priority for American Rivers. We strongly support the City of Sumner's interest in conserving biodiversity in coordination with new development, especially in the Lower White River BMA, which has already been identified as an area of extreme importance. Please support these amendments that encourage protecting biodiversity.

Sincerely,



Michael D. Garrity  
Director, Rivers of Puget Sound and the Columbia Basin

Albert & Louise Belcher  
3325 Meridian Ave E Ste. 1  
Edgewood, WA 98371  
253.878.1155



April 10, 2015

Ryan Windish  
Planning Manager  
Sumner Community Development Department  
1104 Maple Street Ste. 250  
Sumner, WA 98390

RE: 2015 Updated East Sumner Neighborhood Plan  
Parcel #'s 0520193138 & 0520194022

Dear Mr. Windish:

We would like to start by complimenting the Sumner Community Development Department on the wonderful job they have done and continue to do for the City of Sumner, their vision and dedication is exemplary.

17-1

As members of this community since "1973", and Commercial property owners (parcels: 0520193138 and 0520194022), on East Main Street since "1990", we have seen a lot of growth here in our little town and truly appreciate how the City of Sumner has been managed to keep the unique "small town" character we remember and continue to enjoy today.

In regard to the February 2015 Updated East Sumner Neighborhood Plan, we are greatly in favor of the idea of East Sumner as a "community hub". Not only is this a wonderful idea for the East portion of town, this will be a great extension to the City as a whole. We also commend the City for taking the initiative in mitigating the extensive wetlands to make envisioned development feasible. However, we would like to recommend that the General Commercial zoning be retained on East Main Street from parcel # 0520193138 to the West, continuing with the additional properties maintaining the General Commercial zoning. These parcels have not only historically been zoned General Commercial, but have longstanding, prosperous businesses that would not be allowed under the proposed changes! Changing these properties to Neighborhood Commercial zoning will not only cause them to suffer a substantial and measurable decline in the property market value, it will restrict opportunity and private investment and severely limit more positive future opportunities! The best use for these properties is to retain the General Commercial zoning!

17-2

17-3

17-4

We sincerely hope you consider not changing this zoning, as it will be a severe detriment to business owners, property owners and the City of Sumner!

Sincerely,

Albert & Louise Belcher

# Transmittal

Date: March 19, 2015

To: Ryan Windish, AICP City of Sumner Planning Department

Address: 1104 Maple Street; Sumner WA 98390

Phone: 253-299-5524

From: DeGoede Brothers, LLC

Re: City of Sumner Planning Commission Public Hearing, Draft Comprehensive Plan, East Sumner Neighborhood Plan/Municipal Code Update, Supplemental Environmental Impact Statement, and East Sumner Neighborhood Planned Action Initial Comments and Request for Information

### Instructions/Comments:

Ryan,

For your review and discussion at this evenings Public Hearing meeting.

### List of Transmittal Items:

- DeGoede Brothers, LLC Letter
- DeGoede Family Aerial Map of owned properties
- DeGoede Family Parcel Map of owned properties
- Page #17 of the City's East Sumner Plan – Proposed Zoning
- Page #24 of the City of Sumner Plan Set – Visualization of East Sumner Village around the year 2035

Name Delivered to:

Signature

Department

Phone:

Date Signed For.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



DEGOEDE BROTHERS LLC  
5816 162ND AVENUE E  
SUMNER WA 98390

March 19, 2015

City of Sumner Planning Department  
And City of Sumner Planning Commission  
Attn: Ryan Windish, Planning Manager  
1104 Maple Street,  
Sumner, WA 98390

Subject: City of Sumner Planning Commission Public Hearing, Draft Comprehensive Plan, East Sumner Neighborhood Plan / Municipal Code Update, Supplemental Environmental Impact Statement, and East Sumner Neighborhood Planned Action Initial Comments and request for information

Dear: City of Sumner, Planning Commission and Planning Department, Attn: Ryan Windish, Planning Manager

The following information is provided as Part of the Planning Commissions Public Hearing as official comments and an official request for information for and from the City of Sumner, in regards to the City of Sumner's Draft Comprehensive Plan, East Sumner Neighborhood Plan / Municipal Code Update, Supplemental Environmental Impact Statement, and East Sumner Neighborhood Planned Action.

Because the property owners are unable to make the Public Hearing we are submitting these initial comment(s) and request for information to the City of Sumner Planning Commission and the City of Sumner Planning Department as part of the Public Hearing schedule for 7:00 pm on 19 March 2015.

See attached Aerial and Parcel Map of the properties we own and the area we are interested in better understanding the effects that the plan may have on our properties.

The basis for our comments are from review of the following documents, plans, reports and other documents provided by the City of Sumner:

1. 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. This also include updates to the City's Transportation Plan and Capital Facilities Plan. 18-1
2. 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. 18-2
3. 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. 18-3

General Overview Comments:

In review of the documents provided and attending the meetings and workshops over the last year we the property owners at this time are in support of the proposed plan but want to hold off on our official support of the full plan until such time that we can have the following questions and concerns answered.

# 1. FUNDING: The Proposed Plan calls for a Pedestrian / Bicycle Friending road system going west to east along Main Street / 60<sup>th</sup> Street SE. With this plan and these improvements we know there will be a lot of cost associated with the improvement plan. Can you please tell us how these improvements will be funded?

18-4

# 2. RIGHT OF WAY: The Proposed Plan calls for a Pedestrian / Bicycle Friending road system going west to east along Main Street / 64<sup>th</sup> St SE. With this plan and these improvements will there be any additional right of way that will be required to be dedicated to the City. If that is so can you please tell us the final road way cross section planned and how much right of way my property(s) will have to dedicate to the City and who will pay for the right of way dedication?

18-5

# 3. ZONING: The Proposed Plan calls for some property's in the area to be re-zoned as part of the process. Our Present Zoning is General Commercial. The Plan indicates that all of our property will be Zoned Mixed Use. Although we support proposed rezoning that will increase commercial and residential development and expansion in the area we are concerned about the following two items.

18-6

(1). what will happen to any existing building's, business and facility's that do not meet the new zoning code and development standards for that zoning?

(2). Also we are concerned about what the new Mixed Use Zone will look like and what will be allowed. So can you provide the official Mixed Use Zone Specification and Development Standards that will be part of this re zone for our review and analysis?

# 4. ACCESS: As part of the proposed plan at some point in time a new east west road 62nd St E will be added and a new North South Road will be added in this area and the existing Main Street / 64<sup>th</sup> St SE and Sumner Tapps Hwy E Intersection will have some new restrictions and/or will be closed. Can you tell us what these restrictions will be and can you please confirm that the Main Street / 64<sup>th</sup> St SE and Sumner Tapps Hwy E Road will not have the added restrictions and/or will not be closed until such time that the new east west road 62<sup>nd</sup> St E and the new North South Road is opened.

18-7

# 5. INTERSECTION: With the new road alignments and the increased traffic will a signal be required at the intersection of Main Street / 64<sup>th</sup> St SE and 160<sup>th</sup> Ave E. If so, will additional right of way be required for this area and who will pay for the cost for the signal.

18-8

# 5. PROPOSED PLAN / ALTERNATES: Based on the review of the information provided by the City it is not clear what plan is being recommended for approval. If you look at the plans provided by the City (Attached) that being Page # 17 Proposed Update Map with Zoning, Page # 24 Visualization East Summer Village, do not line up. And there is no proposed visualization of our site / area. Can we please get confirmation of the correct map and road alignments? And can we understand why are property is not included in the Visualization East Summer Village plan.

18-9

**IN CLOSING:**

Again, as listed-above we are in support of a Master Plan for this area but want to hold off on our official support of the full plan until such time that we can have a better understanding on the effects that the plan and changes will have and will bring to our properties based on the above listed questions.

18-10

We are also more the willing to sit down with City staff if that would be there request to help us better understand the effects on our property and for the city at that time to provide us the answer to our questions above.

We are also more the willing to sit down with City staff if that would be there request to help us better understand the effects on our property and for the city at that time to provide us the answer to our questions above.

We would also ask that answers and/or information that con answer our concerns and questions be provided to the below listed people so we can complete are review of the 2015 Comprehensive Plan and East Sumner Neighborhood Plan so we can officially support the 2015 Comprehensive Plan and East Sumner Neighbor Hood plan.

18-11

- DeGoede Brothers LLC, 5816 162nd Avenue E Sumner WA 98390
- Abbey Road Group Land Development Services Company LLC, P. O. Box 1224 Puyallup, Wa. 98371
- Windmill Gardens, 5823 160th Ave E Sumner, WA 98390
- DeGoede Farms. 7106 166th Ave E Sumner, WA 98390
- Paul DeGoede, 5816 162nd Avenue E Sumner WA 98390
- Phil DeGoede, 5816 162nd Avenue E Sumner WA 98390
- Ben DeGoede, 5816 162nd Avenue E Sumner WA 98390

**PARTY OF RECORD REQUEST:**

We would also like to ask at this time that all of the following companies and businesses become a Party of Record of this process and that they are provided and sent copies of all Project Notices and project information from this point until the completion of the 2015 Comprehensive Plan review and approval project.

18-12

- DeGoede Brothers LLC, 5816 162nd Avenue E Sumner WA 98390
- Abbey Road Group Land Development Services Company LLC, P. O. Box 1224 Puyallup, Wa. 98371
- Windmill Gardens, 5823 160th Ave E Sumner, WA 98390
- DeGoede Farms. 7106 166th Ave E Sumner, WA 98390
- Paul DeGoede, 5816 162nd Avenue E Sumner WA 98390
- Phil DeGoede, 5816 162nd Avenue E Sumner WA 98390
- Ben DeGoede, 5816 162nd Avenue E Sumner WA 98390

I thank you for your time in regards to this matter and look forward to working with you to receiving answers to our questions and concerns in regards to the 2015 Comprehensive Plan and East Sumner Neighborhood Plan.

Sincerely Yours.

 3/19/2015

*Paul DeGoede*

DeGoede Brothers LLC

*Beautifying One Flower @ Time*

Operations and Partner

wk# 253-863-0488 Ex. 113

cell# 253-377-7818

[paul@degoedebrothers.com](mailto:paul@degoedebrothers.com)

cc:

- Gil Hulsmann, Abbey Road Group Land development Services Company LLC, P. O. Box 1042 Puyallup, Wa. 98371
- Windmill Gardens, 5823 160th Ave E Sumner, WA 98390
- DeGoede Farms. 7106 166th Ave E Sumner, WA 98390
- Paul DeGoede, 5816 162nd Avenue E Sumner WA 98390
- Phil DeGoede, 5816 162nd Avenue E Sumner WA 98390
- Ben DeGoede, 5816 162nd Avenue E Sumner WA 98390

Enclosures:

DeGoede Family Aerial Map of owned Property's

DeGoede Family Parcel Map of owned Property's

Page # 17 of the City's East Sumner Plan – Proposed Zoning

Page # 24 of the City of Sumner Plan Set – Visualization of East Sumner Village around the year 2035

Project Title: 12-114 Aerial Map 2

Client: DeGoede

Issue Set /Date: 12-2014



928 Shaw Rd Suite A  
Puyallup, WA 98371  
T: (253) 435-3699 F: (253) 441-5515  
www.abbeyroadgroup.com

Map Legend

- Tax Parcels**
- Base Parcel
  - Condominium
  - Other
- Roads**
- Interstate
  - Limited Access State Routes
  - Other State Routes
  - Ramps
  - Major Arterial
  - Collector
  - Local Access
- County - 2011 - Ortho



Scale 1:1,219  
0 50 100 ft.

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The map features are approximate and are intended only to provide an indication of said feature. Additional areas that have not been mapped may be present. This is not a survey. The orthophotos and other data may not align. Pierce County assumes no liability for variations ascertained by actual survey. All data is expressly provided AS IS and WITH ALL FAULTS. Pierce County makes no warranty of fitness for a particular purpose.



Project Title: 12-114 Parcel Map 2

Client: DeGoede

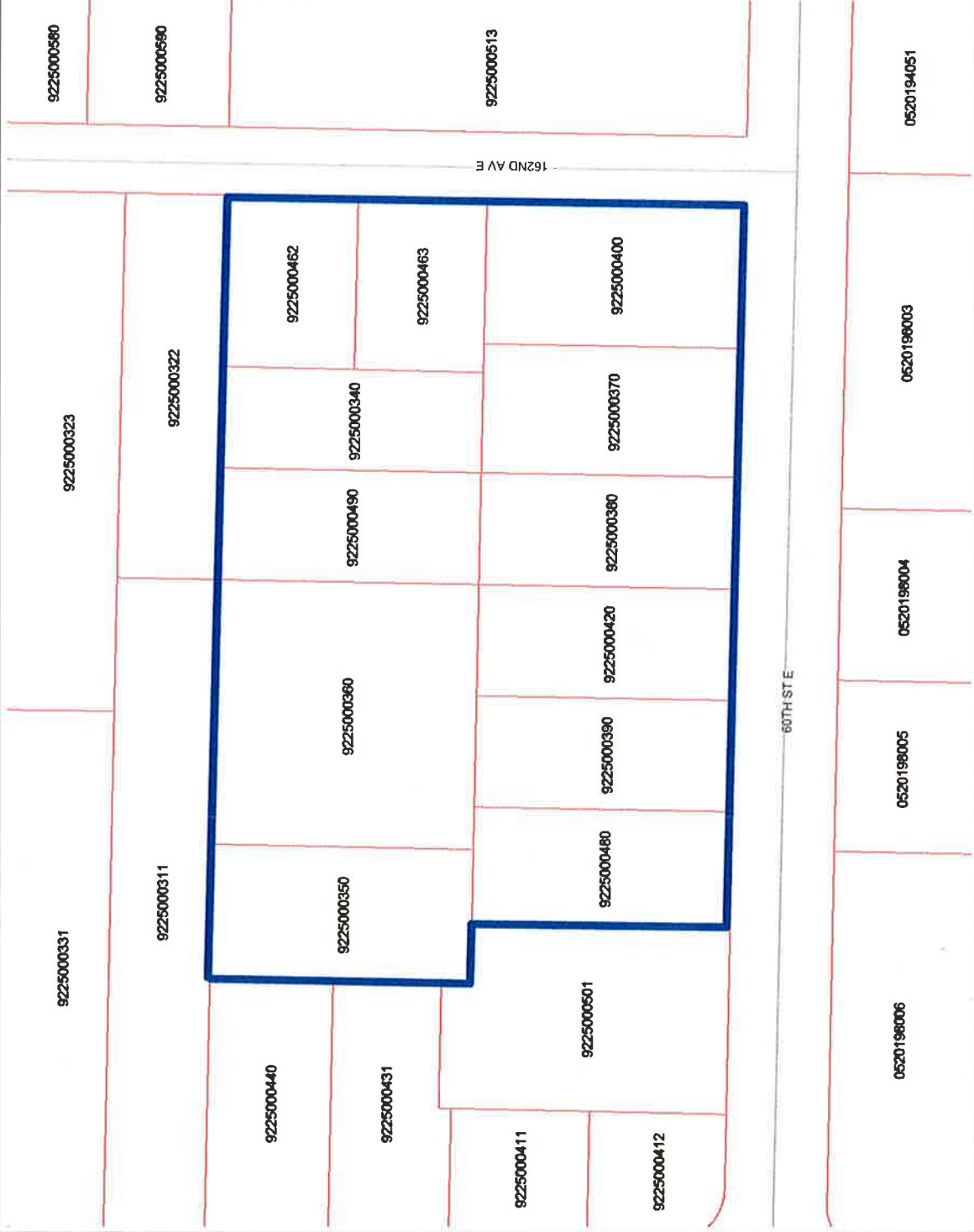
Issue Set /Date: 12-2014



923 Shaw Rd, Suite A  
Puyallup, WA 98371  
T: (253) 435-3699 F: (253) 441-5515  
www.abbeyroadgroup.com

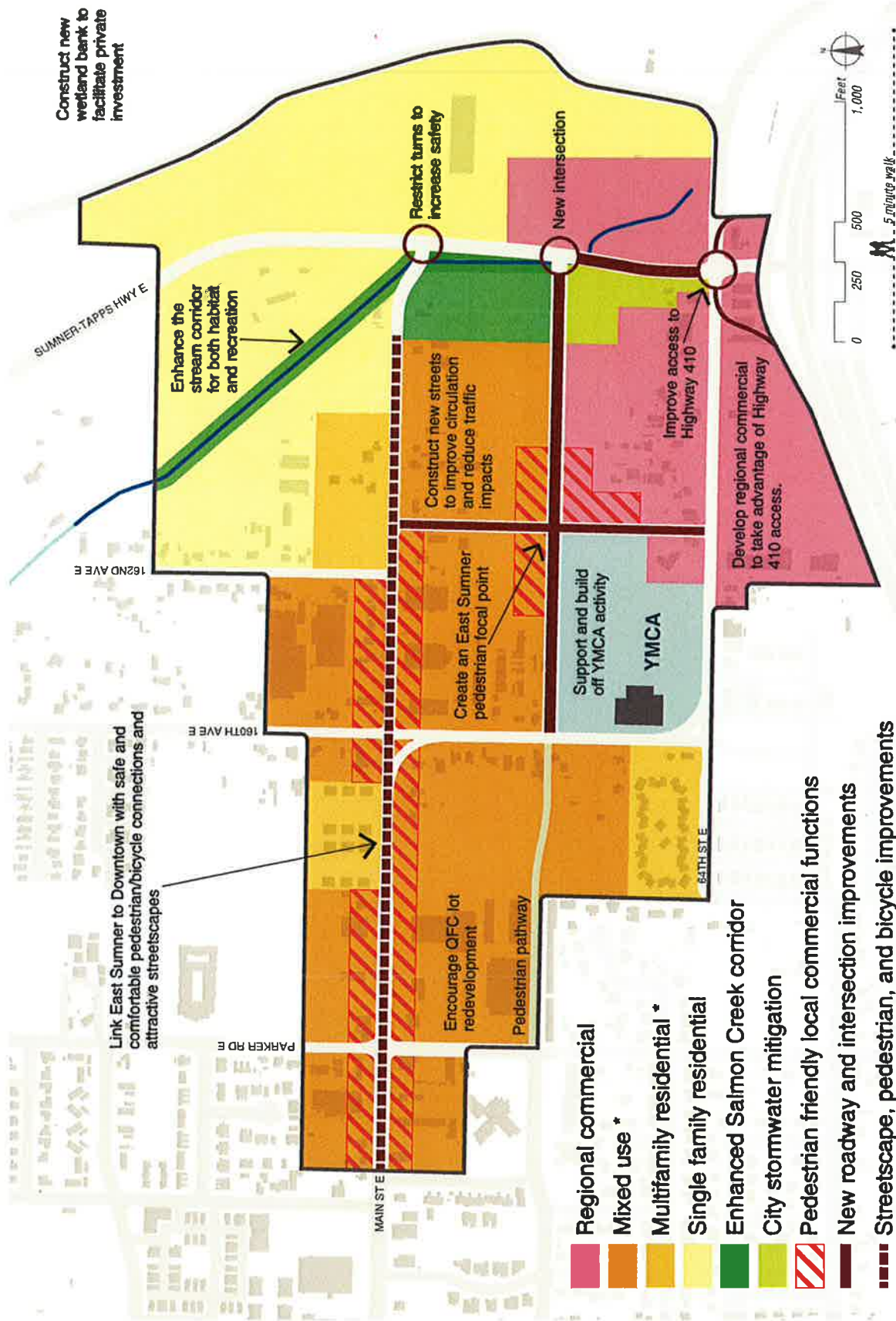
Map Legend

- Tax Parcels**
  - Base Parcel
  - Condominium
  - Other
- Roads**
  - Interstate
  - Limited Access State Routes
  - Other State Routes
  - Ramps
  - Major Arterial
  - Collector
  - Local Access



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The map features are approximate and are intended only to provide an indication of said feature. Additional areas that have not been mapped may be present. This is not a survey. The orthophotos and other data may not align. Pierce County assumes no liability for variations ascertained by actual survey. All data is expressly provided AS IS and WITH ALL FAULTS. Pierce County makes no warranty of fitness for a particular purpose.



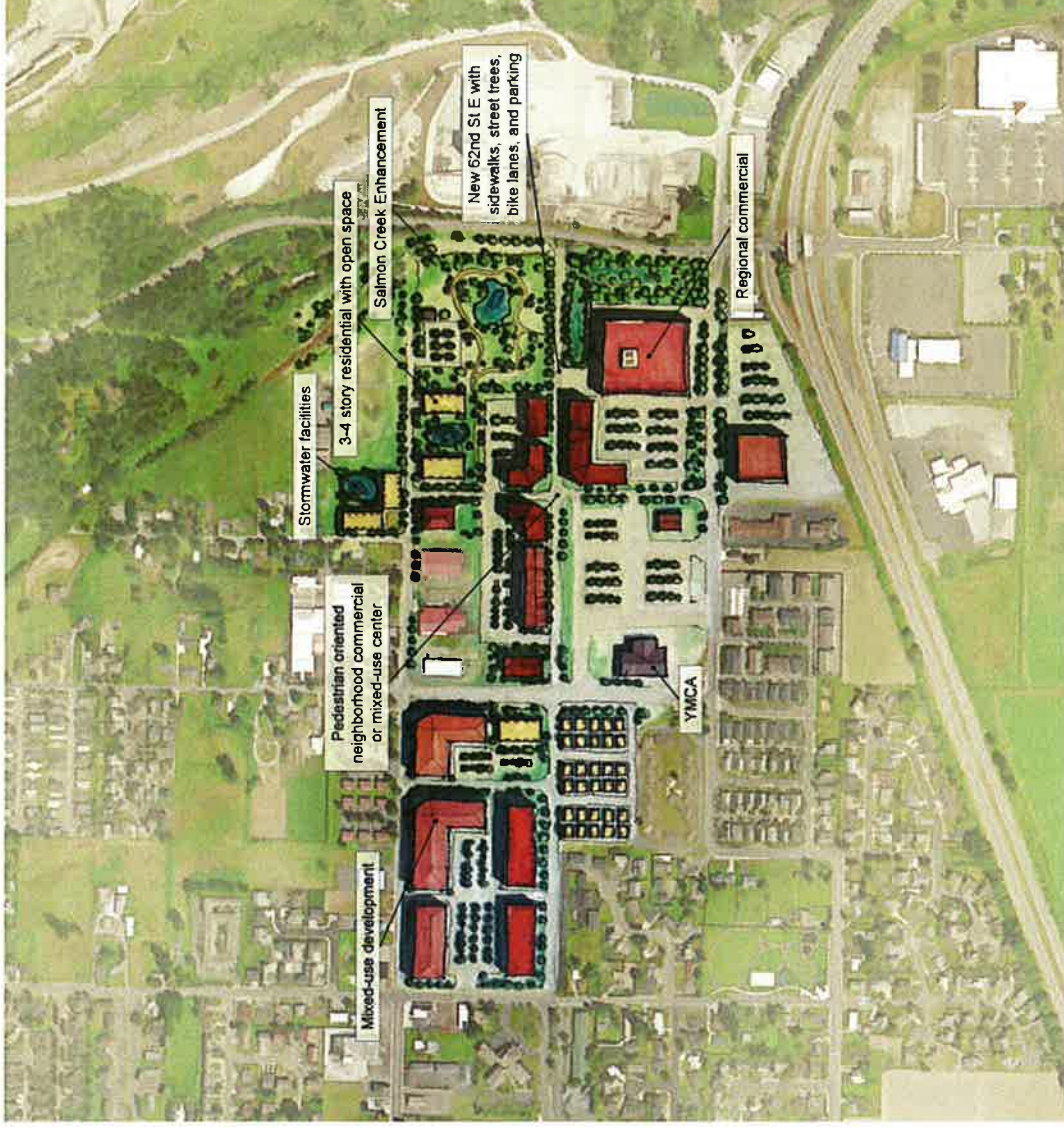
\*Up to 40 dtu/ac with open space requirements

Concept diagram of the proposed updates to the East Summer Neighborhood Plan.

## Community Design

Although the project goals and objectives voiced by participants in the public process did not include specific statements addressing community design character, the physical appearance and function of the neighborhood setting is important in achieving the economic and community livability goals. The overarching challenges related to community design is to ensure that the new development 1) Enhances the small scale and "open feel" valued by local residents, and 2) Creates a more connected and attractive pedestrian environment. To this end, the plan proposes three primary measures:

- Require that new multi-family and mixed-use development adhere to Sumner's design guidelines and include ample open space and landscaping.
- Encourage new mixed-use and commercial development along East Main Street west of 160th Avenue E and near the corner of the new 62nd Street E and a new 162nd Avenue E (running north and south, just east of the YMCA) include pedestrian oriented retail to serve the neighborhood.
- Improve streetscapes, pedestrian links, and bicycle facilities to increase non-motorized circulation.



Visualization of the East Sumner Village around year 2035.

*The Mission of the Friends of the Lower White River (FLWR) is to work for the Biodiversity and Health of the Lower White River and its Communities.*

**WHY "BIODIVERSITY"?**

"Biodiversity" (biological diversity) is a good measure of environmental and ecosystem health. We humans can't survive without a healthy environment. We have done much to destroy sustainability of our local ecosystems. How ironic, since 'the environment' is where we live. It is time to work with, rather than against, Nature. It is time to help Nature, so we can be healthy, and can leave our children and grand children a healthy environment.

**WHAT AND WHO.....**

What FLWR is a group of citizens working to preserve our natural environment along the Lower White River and tributaries.

Who: local citizens from Buckley to Summit! Anyone who lives in the Lower White River Basin! Anyone who wants to make a positive difference in their environment!

**HOW .....**

How: By learning more about local wildlife, about the River, its waterside and upland forested habitats, and about the threats to the health of the White River ecosystem, and by acting on that

knowledge.

There are many ways to be active. Become a "citizen scientist" by taking Nature Mapping. Plant native trees and shrubs to restore habitat. Register your backyard as an urban wildlife sanctuary with WDFW. Participate in Biodiversity Management Planning in your community. Help your city or county protect or restore healthy biodiversity in public parks, open spaces, and critical areas. Be a good steward of your own "backyard", for your present and for your children's future.

**WHEN .....**

Whenever you can! Please sign-up for e-mail notices of coming events. See contact information below.....

\* Re map on reverse: the White River once flowed into the Carbon River, via what are now Beaver and South Prairie Creeks. Visit the ~150 ft high bridge over S. Prairie Creek, in Burnett on Hwy 165, for a look into the pre-lahar (mudflow) canyon of the Lower White River.

For more information, or to volunteer for a restoration project, please contact

**Friends of the Lower White River**

[joannefancher@gmail.com](mailto:joannefancher@gmail.com)

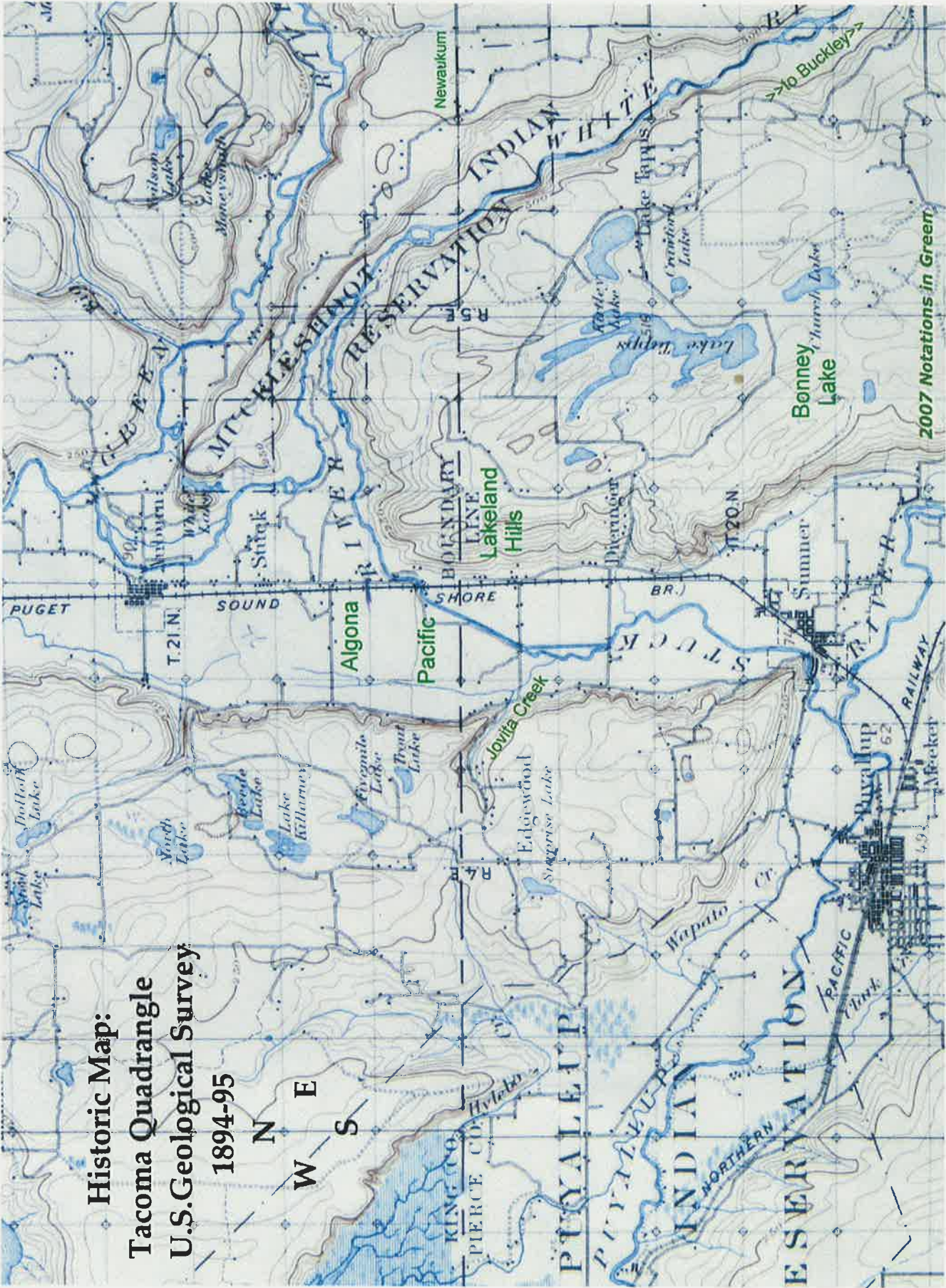
253-833-0977

<http://twitter.com/FLWReditor>

**FRIENDS OF THE LOWER WHITE RIVER**



*The Lower White River stretches from Buckley to Summer. 6,000 years ago a Mt Rainier lahar sent the river north\*. This riparian habitat is biologically rich. It is also rare in the lowlands. Join your friends and neighbors to protect the Biodiversity of the Lower White River.*



Between 1914 and 1919, 20 miles of river between Tacoma and Auburn were straightened and channeled. 100,000 cords of log “debris” were removed (equivalent to 1/2 million yards of gravel). 2005-09 salmon recovery and levee “set-back” plans are reversing many 1914-19 flood control “improvements”. Original Map @ Tacoma Public Library, Main Branch, Northwest Room. © 2007 Friends of the Lower White River, <http://twitter.com/FLWReditor>

Mike R. Herbert  
PO Box 2032  
Sumner, WA 98390

April 23<sup>rd</sup>, 2015

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

**Subject: East Sumner Plan/Sumner Comprehensive Plan**

To Whom it May Concern:

As a nearly life-long resident of Sumner and a current resident of East Sumner, I have serious concerns about the city's push to make a new East Sumner neighborhood plan. I have addressed some of the issues I have with the East Sumner plan and likewise some items that might have bearing on the entire comprehensive plan. For my letter I will refer to 60<sup>th</sup> Street East as Main Street and 160<sup>th</sup> Street East as Van Tassel Road.

Traffic

One of the major concerns contained within the East Sumner Plan is the connection with Sumner-Tapps Highway. While I have heard many voice concerns about the current intersection between Main Street and Sumner-Tapps, I have not seen any proof that this continues to be a dangerous intersection. I live about one block away from this intersection and I have yet to see or hear an accident. I feel like many of the concerns for this intersection date back to the previous alignment that allowed a left turn from Main Street to Sumner-Tapps Highway. Based on this unfounded view, the creation of a new roadway at 62<sup>nd</sup> Street East seems unnecessary. A better use of fund would involve what was originally shown on the East Sumner proposal maps—a jog in Main Street to join in with Sumner-Tapps about 500 feet south of the present junction. This change would be much more cost effective than the plan to create an all new roadway to bisect the large wetland area. Also, it would justify the improvements on Main Street for pedestrians and bicycles. This also improves access to the rest of Sumner in order to avoid excessive vehicular turns that would be involved with the creation of a new 62<sup>nd</sup> Street East.

20-1

The expense of a new roadway at 62<sup>nd</sup> Street East far outweighs the benefits of such a road. For a fraction of the cost of a new road, improvements could be made to both Main Street and 64<sup>th</sup> Street and allow for better access to the rest of the city itself. Sixty-fourth already allows for good access to Meade-McCumber Road and, as previously mentioned, an improved Main Street will allow for better access to other areas of central Sumner.

The main concern that many citizens of East Sumner area maintain is the poor connection between the Sumner-Tapps Highway and SR 410. This should be the focus of the city for the near future. Even if it requires and investment from the city, the intersection at 410 must be revised. The best way to do that is to reinstate the original westbound exit that dropped vehicles on to 64<sup>th</sup> Street East rather than Sumner-Tapps Highway. This one change would improve traffic flow in this area considerably. Additionally, left turn lanes (with signals)

20-2

at 64<sup>th</sup> and Sumner-Tapps would improve the flow of traffic through the area. No significant change would be needed for the westbound entrance ramp for the near future since it really isn't the cause of the problems in this area—instead it is the traffic exiting 410 from the westbound direction. I would also encourage the city to avoid roundabouts that cause significant confusion to many. Instead, the city should focus considerable time and funds on sidewalk and crosswalk improvements in order to connect the area around WinCo to the rest of East Sumner and likewise downtown.

If traffic improvements are focused on the connection between 410, 64<sup>th</sup>, and Sumner-Tapps, quality of life will improve significantly in the East Sumner area.

20-2  
Con  
t'd

### Community Character

Another major concern that is not explored in the East Sumner plan is the community character of the East Sumner area. Currently the area is all but cut off from the rest of the city when it comes to sidewalks. This is improving soon with the establishment of sidewalks along Van Tassel Road and Main Street. Better lighting, these new sidewalks, and a focus on making this area LOOK like it is part of Sumner should be a priority. I would strongly encourage the city to take a look at renaming streets in order to match with the rest of the city. Both downtown and West Sumner build their character by having named streets that form a grid. That should be encouraged as growth continues throughout Sumner. Cities like Pacific, Orting, and Enumclaw all name their streets. Doing something similar would be a definite plus for both community character of East Sumner and the entire comprehensive plan of the city.

Another issue with community character is the fact that the city has not acknowledged the current uses of the land within the East Sumner area. Even though half a dozen single family homes were eliminated with creation of the YMCA, this area still is predominantly single family. The proposed community plan the city seems to be throwing those single family residents to the curb. The city sees multifamily and commercial as the best use of much of the East Sumner area. Instead, it might be better to consider that the traditional mixed use of business/commercial, single family, and some multifamily should be embraced. This ties directly in with the community character of this area. I would hate to see what happened in North Sumner where warehouses took over happen to the residents of East Sumner with four story apartments and big box retailers.

The multifamily options presented at the numerous meetings about East Sumner not only won't fit in the East Sumner area well, they don't match what is presently in the entire community of Sumner (or Bonney Lake or even most areas of Puyallup). This is probably the highest priority community character issue. Should one of the current single family homes cower under the shadow of a four story apartment complex?

20-3

### Wetland Mitigation

One of the main discussions in the East Sumner plan includes the very expensive plan to move wetlands from this area and transplant them in North Sumner. This seems like a poorly thought out and incredibly expensive idea that should be eliminated from the comprehensive plan. Even those that aren't environmentalist would argue that “moving” a wetland three miles is probably not doing the area of the original wetland any good. The wetlands of East Sumner should be mitigated in East Sumner. Period. These wetlands are actually a part of the community character and allow for open space between any new developments. Also, the costs associated with this wetland mitigation, no matter what the experts propose, will greatly exceed the benefits (this goes back to the previous argument that giant multifamily developments are unlikely to happen in this area, which is required in order to “pay” for the mitigation).

20-4

### East Sumner Zoning

One of the least contentious ideas of the comprehensive plan and likewise the East Sumner plan is the zoning. Honestly, it shouldn't matter what the zoning is in this area. It is best if it continues to be a mixed use area. Some could argue that commercial should be isolated along the main thoroughfares such as 64<sup>th</sup>, Main, and Van Tassel. Again, it would be best to focus on the cost of establish new zoning areas. Maintaining the current zoning areas or doing minor tweaks along Main Street are all that are really necessary.

20-5

### Planned Action

Another unnecessary of the East Sumner plan is the planned use proposal. As a resident of the area I would like to see each proposal in this area go through its own environmental review. Eliminating this step takes the public out of the process that should take place with any proposal that changes the land excessively. The project/permit process is a better double check for the area of East Sumner. Creating a planned action area seems to throw residents in the area under the bus giving them very little leeway concerning nearby developments. While the city might see this as an easier way to get big developments in East Sumner, it is not the best planning tool.

20-6

Looking at the proposed growth estimates, the time spent establishing this new East Sumner plan far outweighs the benefits. The "Assertive Collaborative Action" seems to indicate numbers that are really too low to justify the new plan and likewise much higher than any developments that actually occur in East Sumner would actually create. When examining these numbers, there is not a huge different between the three alternatives! The best "plan" is to let the area develop "naturally." One could look at plans put forward by the city in the past (the previous East Sumner plan and the Town Center plan come to mind) to prove that a city-established plan is not a successful plan. Instead, taking things step by step and allowing a natural progression actually makes for better communities.

### Commercial Growth Myth

One last thing that must be explored is the thought that there are large areas of East Sumner that are prime for commercial growth. Unfortunately this is not the case. There are numerous areas in East Sumner that are shovel-ready for commercial development but there is no interest. Some examples are: areas of land behind the Shell station and adjacent to the WinCo shopping center, the old QFC building, the land were the old Thriftway building was, and finally and most obvious, the area near the 410 Plaza. Doing new zoning and giving East Sumner a new "plan" will not encourage more commercial growth. Areas outside Sumner has already gotten all the businesses that would most likely go into the areas the city is proposing for commercial growth. Bonney Lake, Auburn, and Puyallup/South Hill are too close for large commercial developments to establish themselves in Sumner no matter how much the city wants it.

20-7

I strongly encourage the planning commission and city council to examine all the aspects of the East Sumner plan, and likewise the comprehensive plan carefully. The East Sumner plan is not something that should be given any more time and money by the community planning department or the city itself. If this small part of town (less than 200 acres) is to grow it is going to grow better naturally, not with this heavy-handed and expensive plan that has been put forward mostly by consultants that don't really know the area themselves (take it from someone that was at most of the East Sumner meetings—it was obvious that the consultants had not put their feet on the ground in the area). The NO

20-8



ACTION alternative is best, with some transportation improvements that need to happen no matter what, or potentially Alternative 2 which only involves zoning. The grossly overstated benefits of a new 162<sup>nd</sup> Street East and far-off wetland mitigation should be avoided at all costs. It cost the city as a whole too much and especially the residents of the area since they will be required to pay for these pie-in-the-sky ideas.

Sincerely,

Mike R. Herbert

Mailing Address:  
PO Box 2032  
Sumner, WA 98390

Street Address:  
5912 164<sup>th</sup> Avenue Court East  
Sumner, WA 98390

## Ryan Windish

---

**From:** Pamela Holm <pamholm1@msn.com>  
**Sent:** Thursday, June 26, 2014 2:55 PM  
**To:** Ryan Windish  
**Subject:** Re: E Sumner

Great - thanks.

On Jun 26, 2014, at 1:44 PM, Ryan Windish wrote:

> Pamela,  
> Thank you for your comments! I will make sure these are included with other comments we receive from the meeting and be notifying you of future meetings later in the summer.

> Thank you for being involved!

> Sincerely,

> Ryan

>

> Ryan Windish, Planning Manager

> City of Sumner

>

> -----Original Message-----

> From: Pamela Holm [<mailto:pamholm1@msn.com>]

> Sent: Thursday, June 26, 2014 12:53 PM

> To: Ryan Windish

> Subject: E Sumner

>

> Hi Ryan,

>

> I will be out of town for the E Sumner meeting but wanted to give you my input. With the new YMCA re-energizing E Sumner, I think the city priorities should be installing sidewalks and bike paths entirely throughout E Sumner where they are not currently located; making sure there are streetlights throughout to encourage walking at night, and burying wires when the opportunity comes with new development. Beautification efforts should include planting trees, having summer hanging baskets, removing all graffiti as soon as it's spotted, and regulating the colors that business especially can paint their buildings. I would also encourage single family home vs. multi-family construction in the area.

21-1

21-2

21-3

>

> Thanks,

>

> Pam Holm

> 6103 153rd Ave. E., Sumner 98390

> [pamholm1@msn.com](mailto:pamholm1@msn.com)

>

Ryan Windish  
Planning Manager  
City of Sumner  
1104 Maple Street, Suite 250  
Sumner, Washington 98390  
[ryanw@ci.sumner.wa.us](mailto:ryanw@ci.sumner.wa.us)

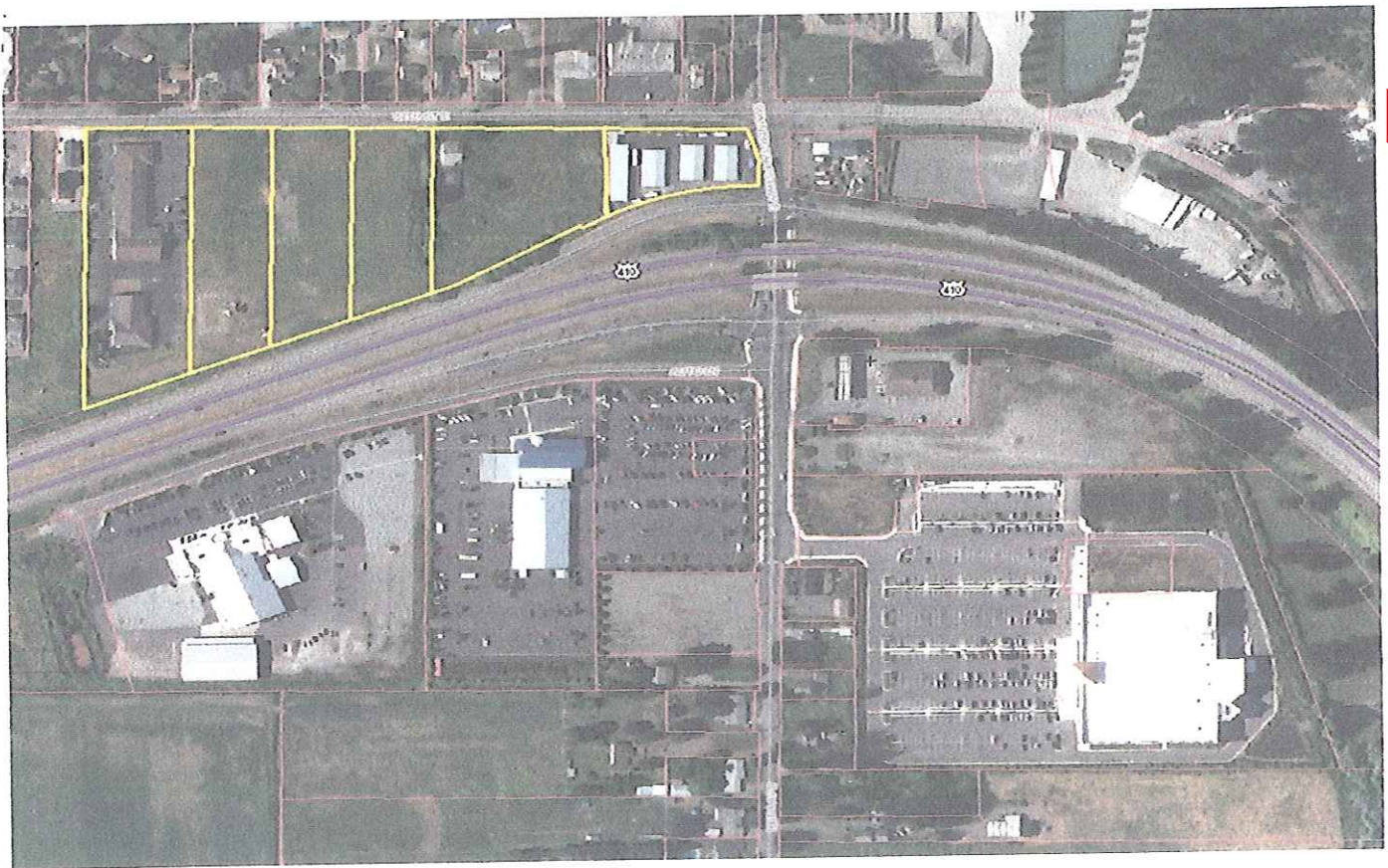
Dear Ryan,

We own tax parcel 0520301045, 16402 64<sup>th</sup> St. E., Sumner, WA.

We have been working with Fred Crase and Azure Green Consultants, LLC on development plans for the property. The property is encumbered by an easement to Williams Pipe Line for a gas transmission line.

The property is currently zoned General Commercial. This zone and some of the restrictions within the zone have made it difficult to come up with an economically sound land use for the property.

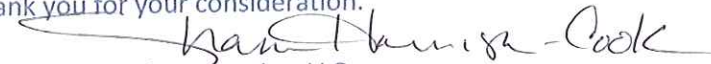
We would like to request that the property be re-designated as Interchange Commercial (IC) as part of the comprehensive plan update that is currently underway in the City.



22-1

We believe that the change to Interchange Commercial should be considered for all of the parcels highlighted in yellow above.

Thank you for your consideration.

  
Shannon & Keith Properties, LLC



LAW GROUP PLLC

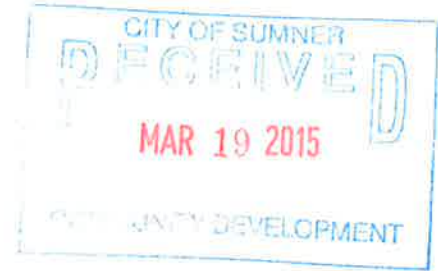
3600 Port of Tacoma Road, Suite 311  
Tacoma, WA 98424  
P 253.922.5464  
F 253.922.5848

ATTORNEYS AND COUNSELORS

Gregory F. Amann  
gfa@vsilawgroup.com  
(253) 878-5004

March 19, 2015

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



Re: Comments to East Sumner Neighborhood Plan  
Property located at 3251 Pacific Highway East, Fife, WA  
Parcel Nos. 7085000400 and 7085000410

Dear Ryan:

Our office represents John and Jackee Bechtold, owners within the East Sumner Neighborhood planning areas located at 6108 160th Avenue East, Tax Parcel Nos. 0520194010, 0520198001, 0520198002, 0520194057, 0520194081, and 0520194082. The purpose of this letter is to provide comments regarding the proposed East Sumner Neighborhood Plan (the "ESNP").

Although the Bechtolds support the ESNP in general, and the rezoning of their property to Neighborhood Commercial under the ESNP, they strongly encourage the City to allow other housing type, such as zero lot line dwellings, cottage housing, and townhouse condominiums as a permitted uses in the NC/ESUV overlay district, provided minimum densities are provided to meet the overall goal of the ESNP. Allowing these additional dwelling types within the NC/ESUV provides several benefits in furtherance of the goals and vision of the ESNP:

1. Encourages maximum development flexibility while meeting overall plan goals of adding density.
2. Allows creativity to respond to market conditions/demand over the implementation timeline of the ESNP.
3. Creates additional opportunity to provide housing at a variety of price points to meet the needs of the community.
4. Allows a housing-type and density transition from areas outside the plan to that within the plan.
5. Fosters faster implementation of planning goals because new language increases additional development opportunity.

23-1

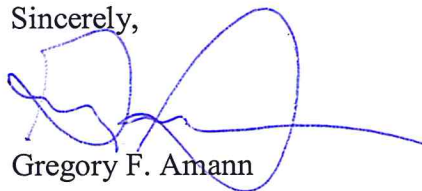
Ryan Windish  
Planning Manager  
Sumner Community Development Department  
March 19, 2015  
Page 2

We have set forth the following proposed additions to ESUV Section 18.30.030(C)(22) that would allow or these additional housing types:

Multifamily dwellings, apartments, rooming houses and boarding houses, retirement homes, assisted living facilities, continuing care communities, board and care homes, hospices, or nursing homes, in accordance with the city of Sumner Design and Development Guidelines, and subject to density maximums and locations as applicable in SMC 18.30.040. Within the NC Overlay Zone, other housing types, including but not limited to single-family, zero lot line, townhouse condominiums and similar housing product, are permitted uses when developed as part of an integrated mixed use development that meets the overall minimum density for the district.

The Bechtolds would appreciate it if these comments were included in the record for the planning commission and city council's consideration of the proposed ESNP and implementing zoning regulations.

Sincerely,



Gregory F. Amann

23-1  
conti.



# EAST SUMNER NEIGHBORHOOD WORKSHOP

FEBRUARY 26, 2015

## Comments?

Thank you for attending the East Sumner Neighborhood Plan workshop! Your input is critical to creating a vision for East Sumner and a workable plan for the future.

This is also an opportunity to comment on the following:

- East Sumner Neighborhood Plan
- Planned Action Ordinance
- Draft Comprehensive Plan
- Draft Supplemental Environmental Impact Statement (Draft SEIS)

This form can be mailed in, placed in the utility bill payment box (located just outside City Hall), or dropped off upstairs in Community Development.

Widen Sumner Tapps Hwy to 4 lanes

24-1

Encourage an Apt Complex for 55 and older that's new and nicer than anything Sumner has now. Like SHAG. AFFORDABLE & Roomier than studios. What's here now is only studios, high dollar or substandard.

24-2

Who will pocket the most money from this endeavor from beginning to end?

24-3

**DRAFT DOCUMENTS** are available online at: [www.ci.sumner.wa.us](http://www.ci.sumner.wa.us)

For more information or questions contact Ryan Windish, Planning Manager at 253.299.5524 or email: [rvanw@ci.sumner.wa.us](mailto:rvanw@ci.sumner.wa.us)



# EAST SUMNER NEIGHBORHOOD WORKSHOP FEBRUARY 26, 2015

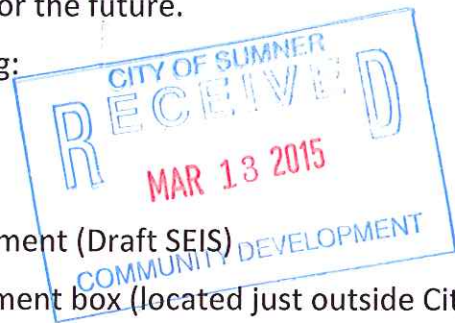
## Comments?

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I AM PLEASED WITH THE PLAN AS IT WAS PRESENTED,

25-1

ESPECIALLY THE STREET GRID IMPROVEMENTS. THE STORMWATER

MITIGATION BANK PLAN IS BRILLIANT. I AM LOOKING FORWARD

INCREASED OCCUPANCY, RE-VITALIZATION, AND URBAN

25-2

RENEWAL ON THE EAST SIDE OF TOWN.

THANK YOU,

5829 156th AVE CT. E

DRAFT DOCUMENTS are available online at: [www.ci.sumner.wa.us](http://www.ci.sumner.wa.us)

For more information or questions contact Ryan Windish, Planning Manager at 253.299.5524 or email: [rvanw@ci.sumner.wa.us](mailto:rvanw@ci.sumner.wa.us)



## **SUMNER PLANNING COMMISSION**

### **MINUTES**

### **SPECIAL MEETING MINUTES**

**Thursday, March 19, 2015**

**7:00 p.m.**

**Sumner City Hall  
1104 Maple Street**

### **CALL TO ORDER**

**SWANSON called the meeting to order at 7:01 p.m.**

### **FLAG SALUTE**

SWANSON led all those in attendance in the flag salute at 7:02 p.m.

### **ROLL CALL**

Members Present: Bush, Hamilton, McDermott, Powers, Robbert, Storey, and Swanson  
Members Absent: None  
Staff Present: Ryan Windish, Planning Manager  
Eric Mendenhall, Senior Planner  
Niomi T. Zinn, Assistant Planner

### **PUBLIC HEARING**

#### **2015 Comprehensive Plan Update**

SWANSON explained the purpose of the Planning Commission Special Meeting was to gather data on each issue of the 2015 Comprehensive Plan Update. The public was invited to speak their views with a limit of five minutes each. He announced that the intention was to adjourn the meeting at 9:00 p.m., and if necessary the Special Meeting will continue on April 2, 2015. He declared the Public Hearing officially opened.

#### **a) East Sumner Neighborhood Plan**

WINDISH presented the DRAFT East Sumner Neighborhood Plan as proposed and a brief history. Greg Easton is the City's consultant in attendance and was prepared to speak. Four workshops have been held in the community to date. The community identified a number of different goals and ended up with three alternative layouts. The preferred option was building a Sumner Planning Commission  
Special Meeting Minutes 3-19-15



new 62nd Street East and mitigating the eleven acres of wetlands. The new 62nd Street East circulation map was projected for all to see. The map also shows the YMCA, to be open August 1st. The three different options were explained:

Path #1: "No action, no pain...but no gain."

Path #2: "Zone it and hope they will come."

Zoning changes and modest street improvements.

Path #3: "Assertive collaboration action: Investment and collaboration."

Property owners still assist with improvements. There is mitigation, filling of wetlands, build 62nd Street East, and allow for greater development.

WINDISH expressed that Path #3 is the staff recommendation. He continued to explain the details. For example, the interchange at 410 is difficult and they will need to work with WSDOT for improvements. A proposed artist rendering was projected. He pointed out the gas line that runs through the East Sumner Neighborhood. Staff commented on the possibilities of future property owners and their uses, such as increasing the multi-family residences with open spaces. He spoke to the proposed zoning, could be mixed use or commercial in some areas. Staff went over the proposed East Sumner Urban Village Overlay concepts. The wetland mitigation bank idea was explained, with an estimated cost of \$3.44 per square foot. Staff explained the City's plans this summer for the City pond and wetland improvements. Detailed explanation of the circulation was reviewed.

GREG EASTON explained his role was to discuss the plan and if it will work. The wetland mitigation plan is to be \$1.7-2.1 million in raw costs. The property owners would have to purchase the right to do this through the Wetland Bank. The new 62nd Street East would be \$4.5-5.0 million through multiple avenues. Will property values after the plan cover the part of the property owners. A vacant piece of land is \$1.30 per square foot. A property owner may be \$3.44 and the road construction through an LID. \$7.50 per square foot would be the estimate for homeowners. Development ready is \$5.00 per square foot. Multi-family is \$10.00. Commercial is \$15.00. Through the City's point of view, they do see some benefit. Increased opportunities for safety, for one. Increased property values and retail development could result in \$89 million annually in retail sales in a 20 year span, which could produce \$750,000 each year. Tax revenue from utilities and fees. Operating expenditures will occur, however it can be efficient to offset expenses which is less than the revue would be at \$750,000 per year. At the end of 10 years, the City would have collected several dollars over the years into the coffers. Gary provided a recap of the likely outcome. Path #3 is an additional investment by the City. Property values will have increased. Local and regional development and multi-family development and tax revenue increased. There is an attractive neighborhood built. Viable stream and wetland improvements. Circulation is more efficient and safer. He expressed the outcome is attractive and positive. The location could also include storm water locations.

WINDISH suggested the next steps. Adopt this plan. Adopt new zoning regulations. Conduct a screening study for the mitigation bank at \$150,000. Prepare a preliminary design and a funding study for the 62nd Street East roadway, and intersection improvement at \$250,000. Total cost for the next steps is approximately \$400,000.

MCDERMOTT inquired about the \$1.2 million expense, for the wetlands being created in general or for the bank. He asked staff what the potential of flooding is? For example, if the City paves over the land, what happens to the potential flooding? Would other areas of Sumner be at risk of flooding?

MENDENHALL explained the \$1.2 million is to create the bank for this location, which is available to mitigate the wetlands of this size. He added the wetlands are category 4, which is low invasive species and is one reason why the City wishes to use this area, which includes biodiversity. Regarding flooding concerns, he pointed out the City is doing improvements occurring along the corridor along Salmon Creek, yet, not sure of the impact. It hasn't been determined yet if other areas of Sumner could be at risk of flooding. That is a part of the \$400,000 question.

MCDERMOTT clarified that the Commission is being asked to approve the East Sumner Neighborhood Plan without the facts of the study.

WINDISH confirmed the statement as staff wants to move forward with the study using all the information that the City currently has.

SWANSON invited members of public to speak.

Mark Nelson, 16523 60<sup>th</sup> Street East. Concerns are closing the east end of Main Street and that it needs to be used as a evacuation route for the lahar. Schools are trained to use this route for evacuation and a foot traffic plan needs to be in place before it's closed. There are only two directions out of town, east and west. The stoplight at Parker/Main has been needed for a long time. He would like to see a stoplight as a higher priority in this location. He was concerned about foot traffic and suggested a pathway from 160th to Parker for increased public safety. He stated it could be nice to get to the YMCA via a path, [from Parker Road to 160<sup>th</sup> Avenue E] however, walking through it [the path] during the winter [and dark] he wants it safe. He is pleased to see the YMCA going in with long term benefits. Regarding the circulations and getting out of town, he requests to overbuild them [the streets]. At rush hour it can take 30 minutes to get out of town.

26-1

26-2

Greg Amann, 3600 Port of Tacoma Road, Ste. 311, Tacoma. Representing John and Jackie Bechtolt. Had a request for the Planning Commission to consider. The traffic regulations required do not include cottage dwellings or condominiums. They feel it would be a benefit as part of a mixed use to allow the developer options, creativity for market purposes. Consider adding high-density uses that are not allowed currently.

27-1

John Huntsman, 14 Hunt Street. Increased traffic will occur. He wondered if anyone has thought of emergency services because of the extra people drawn to the area. He could see the need to build more schools.

28-1

Myrna Vernon, 6216 154th Avenue East. She expressed that she came to Sumner when it was a small town. In her opinion, long term people are being run out of town. She expressed that she

29-1

has seen more bad coming to town than she has seen good. She stated the City does not need more apartments.

Mike Kersey, 6015 160th Avenue East. Used the map to point of National Auto Parts, and other businesses. Kersey mobility and the other one would be considered. Would request to stay general commercial. Would like to stay here a long time. Does not wish for a rezone. IN case of fire, wish to rebuild.

30-1

Jeanne Fancher, 3278 55th. She has a concern about children who do not live within 1,000 feet of parks, they suffer. Does not see a green space in the plan. She currently lives near a location where there is a closed off park. Readjusting Salmon Creek is a good idea, could be a park land. Mention of a wetlands bank, recalls talking to the Mayor about the long term vision. The City needs green spaces, for wildlife and rainfall. Feels more paving effects the pollution of the community. Asked why the GMA, and added populations. Why does it have to make it a higher price from the \$4.00-\$10.00 price? Is it the City's job?

31-1

31-2

SWANSON noted no other public comments for the East Sumner Neighborhood Plan.

## **b) Map Amendments**

### ***1. MIC Overlay (PLN 2015-0002 & 0004)***

MENDENHALL introduced MIC Boundary Amendments. By adding these parcels into the MIC overlay it will promote economic development, job growth and better position the City to receive grant funding for capital facility and transportation improvements. Staff has reviewed and find it compliant to the Comprehensive Plan. Comments received to date include traffic and flood impacts, the Draft EIS has addressed those questions.

SWANSON invited the public to speak.

Tia Ball, 1405 Wood Avenue. She had a question about the building across from Castle Perk. Is there a traffic light going in? She expressed a concern when pulling out from Fryar onto Traffic, there is no view. The building is an eye soar. It is a zoo.

32-1

John Huntsman, 1419 Everett Street. There is no room for landscaping. Have you thought about what you are going to plant there? Where does the leaking oil go from the truck traffic? All of the chemicals going off the pavement go into the river and affect the salmon and eggs.

33-1

George Josten, 16219 64th Street East. He expressed a compliment on good government. It takes a lot of time behind the scenes. He has lived in Sumner 30 years, lives on the wetlands. It has been planned well. Good job. We are making these plans and live in the Lahar region. We have faith that things work out. Including watching out for the rivers and the street I live on. We have the largest industrial location in the west. Much appreciated.

34-1

STOREY asked about trucks coming in off of Zehnder.

MENDENHALL addressed the concern. They are required to complete street improvements. Not sure they have done it yet. One improvement is to be located off Zehnder and one off Fryer. Loading docks are on the east side.

## **2. East Valley Highway (PLN2015-0003)**

MENDENHALL explained the change is owner driven.

MCDERMOTT asked where the re-assignment will be located?

WINDISH stated they are considering the Town Center Plan. Adding capacity in the East Sumner Neighborhood plan to make up for the loss of 174 dwelling units.

BUSH added there were letters in the Commissioner packets from neighboring property owners and it shows they are not in favor of the rezone.

Robin Machofsky, 801 198th Avenue East, Lake Tapps. Continually confused. She was originally in attendance for the golf course. The proposal includes the golf course. She stated that this map was presented before. Didn't realize the golf course had been sold. Clarified that the rezone has happened. The change seems to include the map that is posted at the golf course. Once you take away the green spaces, you can't get them back. The golf course is also very close to the river. Including it in the MIC, she asked does it affect the flood plain. The wetland in the golf course is a part of the mitigation . There is no more time for the public comment.

35-1

SWANSON noted the five minute limit has expired. He invited Ms. Machofsky to write a letter to the Commissioners or Staff.

## **3. 1418 Wood Avenue (PLN2015-0005)**

MENDENHALL introduced the next item. The property has been in various industrial uses for several decades. The City has regularly received applications for change of the use of that. No comments were received.

Tia Hall. She lives right next to this property, 425 Wood Avenue. It used to be automotive. Now they park on top of the street. There is no parking for her mother. They park on the streets. They throw their gutters in the garbage in the 6:00 a.m. As business is booming, more employees are needed and there is no parking.

36-1

## **4. 2005 Cottage Road (PLN2015-0006)**

WINDISH explained the property ownership for the parcel has changed hands, from a private utility to a private, non-utility entity. It should be showing on our map as residential LRD1. This is a technical clean up.

SWANSON noted no public comments.

## **5) Ag to RP - 24th Street (PLN2015-0007)**

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WINDISH introduced the agenda item. The City owns this property. It is the only part of town with this zoning. The City is requesting that approximately 102 acres of property be rezoned from Agricultural (AG) to Residential Protection (RP). When you peel back the requirements, there really is a limited amount of acreage that could be used. Currently the City leases it out to a farmer. Minimum amount of Ag parcel is 20 acres. If it were 100 acres it would be 5 houses. The City retains the right to farm with odor and dust and have the right to be there. There are protections to the farmer due to allowable usage. Received a lot of comments from county, state and local residents on the proposal. Over 50 comments into 20 key points all in favor of preserving the area. The Council is in control and are in the record.

MCDERMOTT asked what the big negative is for the City.

WINDISH explained staff will need to take a fair amount of time to conduct research and take it to the Council. Even though the City hasn't done this before, it is a policy call to go down the road. The City is still in control of property. Can still decide if they want to get rid of it.

MCDERMOTT commented the goal is to prevent sprawl. He asked staff if it will be set up to discourage sprawl.

WINDISH explained the transfer of rights exists and is working well in King and Whatcom counties. A win is when a farmer owns acreage and a developer purchases the developing rights and goes to an urban area willing to take on additional density to make it profitable for the developer. He buys 20 from the farmer, and now there 60 available. Win for the farmer and the developer. In Sumner, it is City owned land and limited to what can be done. Currently the land is leased to a farmer.

SWANSON invited the public to speak.

Jeanne Fancher, 3748 55th Street South, Pacific. This map only shows you limited views. She described the local areas. The large parcel, the golf course, what was promised to the purchaser. The next parcel sold currently has feet of fill. Stewart Road to the City's property is pretty much considered flood plain. In 2009 there was 2 feet of water over the golf course. Then it was sold. Point, great resource appears to be owned by the City. The same resource is now sold to industry. We live in a valley, a fishbowl. It has been 400 years since the Orting mudflow. 6,000 years since the last lahar. The wetland banking seems more important. The owners of the new zoning can change in the new hands. They come to the City for rezoning. You have to accommodate and be concurrent with other Cities. Is Sumner working with other cities? Gaining \$3.44 a square foot for banking. She thinks it is premature to adopt the plan, and asked the Commission to look into it more deeply.

37-1

Linda Burgess, 12822 51st Street East, Edgewood. She talked to the Planning Commission about the land adjacent to the river. So much as been transferred to industry. What is one more parcel? Agree with previous speaker. Need more time to look further.

38-1

SWANSON identified no more speakers.

### c) Text Amendments

1) Staff Report - Vision & Values, Land Use, Economic Development and Community Character.

WINDISH explained that he has presented the following draft concepts to the Planning Commission at previous meetings. He gave a brief explanation of the policy changes being proposed for each element. The key points have been noted.

#### Vision & Values

- ***Sustainability and Health***: The Vision Statement contains references to sustainable and environmentally responsible development.
- ***Downtown Parking***: The downtown parking is balance between demands for residents, businesses, and commuters while maintaining Sumner's small town character and atmosphere.
- ***Growth to the South***: The Vision Statement recognizes that, in the long-term, the City may have to grow to the south to accommodate future population.
- ***Economic Development***: Includes new language that emphasizes the need for historic preservation, promotion, and partnerships and incentives for manufacturing jobs as ways to promote employment, businesses, and economic prosperity.
- ***Biodiversity***: Based on comments from the Pierce County Biodiversity Alliance, the Values statement on the Environment includes references to the importance of biodiversity and the economic and quality of life benefits of a healthy functioning environment.

#### Land Use Development

- ***Joint Planning***: Looking long term, 20-50 years out, the logical expansion area for the City is to the south. The City attempted to amend the Pierce County Urban Growth Area (UGA) in 2011 and it was unsuccessful. However, the City should retain a working relationship with Pierce County and continue joint planning in the area in order to set the stage for future expansion. Figure 1 showed the boundary for the Joint Planning Area.
- ***Annexation Policies***: Proposed Policy 1.9 makes it clear that the City would rely on privately initiated requests for future annexations and would not actively pursue annexations not desired by property owners.

- ***Subarea Planning Required:*** The plan can also be reviewed as a “planned action” which results in expedited permitting when development actually occurs. See proposed Policy 1.10.1.
- ***Sound Transit and SR410 Interchange:*** Sound Transit has committed to assist funding improvements of the SR410 Interchange at Traffic Avenue as part of the parking garage/access project. Proposed new Policy 1.11 in the Commuter Rail/Regional Transit Sub-element would acknowledge this agreement.
- ***Agricultural Zoning and Designations:*** The agricultural heritage of Sumner is a defining characteristic of the community’s past and, where practical, will be retained into the future. Given the changing landscape, staff recommends that the Agriculture Zone and policies related to preservation of agricultural lands within the City limits be removed. See amended Policy 2.3.3 in the Parks and Open Space Element and Policy 1.3.4 in the Environment Element as well as amended Zoning Map and removal of the Agricultural land use description.
- ***Increase Housing Densities:*** The Medium Density and High Density ranges do not match the Zoning Code. Proposed amendments to Table 1 reflect this correction. Proposed housing density in East Sumner is also proposed to be changed to 40 dwelling units per acre for consistency with the Draft East Sumner Neighborhood Plan.
- ***Neighborhood Plan Districts:*** When the first GMA plan was crafted in the mid-1990’s a Community Character Strategy was developed and included identifying various neighborhoods around Sumner. These neighborhoods had “focal points” that included parks, stores, cross-roads, etc. from which a ¼ mile radius could be drawn. The Comprehensive Plan contains a Neighborhoods and Districts Map that shows these areas. See Figure 7 showing areas that have been removed due to changes in zoning and likelihood of developing as a neighborhood focal point.
- ***Clustering Development:*** “Clustering” would allow for a higher density of development on portions of property not encumbered by a critical area such as a wetland and its buffer. The Comprehensive Plan has policy that allows for a “cluster overlay” and identifies a range of densities for clustering development. A new Policy 3.11, in the Environment Element, is proposed that recognizes clustering as an option to consider for properties with critical areas. Cluster areas will also be removed from the Comprehensive Plan Map (Figure 3).

### **Economic Development Element**

- ***Overlap and Redundancy:*** There are numerous policies that repeat topics and objectives that are covered in other more specific areas of policy and the Plan. Several policies should be moved to their respective elements.
- ***Marketing, Recruiting and Partnering:*** The City cannot effectively promote economic development without partnering with other entities such as the Sumner Downtown

Association, Chamber of Commerce and property and business owners. Numerous policy amendments encourage partnering and working together on this important goal. Proposed Policies 1.3, 1.14, 5.11 follow this general theme.

### Community Character Element

- **Overlap and Redundancy:** The element contains cross-references to other topics and elements such as transportation, environment, and parks and open space. These policies are proposed to be removed, relocated, or rewritten to eliminate redundancy.
- **Multi-family in the Town Center:** In the Town Center Plan area there are three requirements that make it difficult to profitably build multi-family housing as follows: 1) stand-alone multi-family structures must be constructed in a “townhouse” or “row house” style; 2) off-street parking must be provided at the same ratio as other parts of the City and 3) multi-family development must be condominium. Proposed amendments to Policies 1.6 of the Housing Element would clarify or reduce these requirements.

Linda Burgess, Edgewood. Speaking on behalf of the Pierce County Biodiversity Alliance. Pleased to see the City is including biodiversity in to the language. In your values statement think it was important to let citizens know there is valuable land along the river. YOU recognize this and appreciate this. Thanked the Commission for their support of the addition of the language into the statement.

38-2

Jeanne Fancher, 3748 55th Street South. Member of Friends of the White River. Promoting biodiversity. Defined biodiversity. Healthy water and clean air equals a healthy wildlife. Want to applaud the Commission for including the language. Friends of the Lower White River is working for the health of the ecosystem, not just in Sumner but everywhere. Encouraging that you are taking it seriously for all the Cities in the watershed. This is where the rubber meets the road. If you look at the map inside, 7-10 blocks in 1884-95, a lot has changed. Thank you very much.

39-1

SWANSON announced that the time allowed for the meeting was up at 8:54 p.m.

### ADJOURNMENT

**STOREY made a motion to continue the Public Hearing on April 2, 2015. HAMILTON seconded the motion. SWANSON announced the Public Hearing will continue in April.**

WINDISH confirmed that the meeting will continue and the Public Hearing is not closed.

SWANSON adjourned the meeting at 8:55 p.m.

*Taryn Capps  
Minutes Taker*





## **SUMNER PLANNING COMMISSION**

### **MINUTES**

### **REGULAR MEETING**

**Thursday, April 2, 2014**

**7:00 p.m.**

**Sumner City Hall  
1104 Maple Street**

### **CALL TO ORDER**

**SWANSON called the meeting to order at 6:59 p.m.**

### **FLAG SALUTE**

SWANSON led all those in attendance in the flag salute at 6:59 p.m.

### **ROLL CALL**

Members Present: Bush, McDermott, Robbert, Storey, and Swanson  
Members Absent: Hamilton and Powers (Notified)  
Staff Present: Ryan Windish, Planning Manager  
Eric Mendenhall, Senior Planner

### **APPROVAL OF MINUTES**

STOREY moved to approve the February 8 and March 19, 2015 minutes. ROBBERT seconded the motion and passed unanimously. There is a correction to be made in the last paragraph on page #2 of the March 19 minutes. It needs clarification and Windish will revise.

### **PUBLIC HEARING**

#### **2015 Comprehensive Plan Update**

SWANSON explained the Public Hearing was continuing from the last meeting. The purpose was to gather data on each issue of the 2015 Comprehensive Plan Update proposals.

WINDISH requested agenda item E to be moved up and follow after item A.

**STOREY made a motion to move agenda item E up to follow after item A. MCDERMOTT seconded the motion. It passed unanimously.**

WINDISH suggested the procedure of presenting the staff reports and allowing public comments.

**a) Text Amendments**

**2. Staff Report-2 (Parks & Open Space, Environment, Housing, Utilities)**

WINDISH commented on the update to the Park & Open Space Plan. The plan needs to be updated every five years in order to be eligible for grant and state funding and policy addresses the need for this update. Biodiversity received additional comments and letters of support. The Planning Commission will receive copies of these additional documents. *Floodplain "zero-rise" Policy*: Currently allows for development to occur within the floodplain provided that there is no more than a 1 foot rise in the 100-year flood level. *Ground Related Housing Type*: Due to the maximum densities of 30-40 dwelling units per acre not being a reality in the Town Center area, the proposed amendments to Policy 1.6 would remove this policy requirement. *Utilities Element* is essentially about coordination and cooperation with utility providers such as PSE and telecommunications.

SWANSON asked for a definition of biodiversity.

WINDISH explained that it means biological diversity and turned it over to Eric Mendenhall.

MENDENHALL explained biodiversity, admitted there are many ways to address it. Essentially, biodiversity is looking at everything from the soils, to air, to plants, and water as a system. What should be protected in that to maintain values the system provides? Including biodiversity language in the City's documents gives staff ability to look into this further. It can be included in everything from a wetlands ordinance, to floodplains, and parks, even densities.

BUSH requested staff show Commissioners the possible locations for the three story apartments on a map.

WINDISH stated that could be done in a study session.

**Public Comments**

**Linda Burgess, 12822 51st St. E., Edgewood, WA.** Representing the Pierce County Biodiversity Alliance. Here to support the biodiversity portion. Reference to letter November 6th, 2014. Has additional ideas to consider. Protecting the high biodiversity areas of the City are their interest. To add, in original letter, there were sub-bullets and they are not included in the update as stands. Would like to see the additional reference to the Lower White River BMA Stewardship Plan, 2009 as an appendix in the comprehensive plan, as it was written directly about the Lower White River areas in Sumner.

42-1

**Jerry Broadus, 901 16th Street SW, Puyallup, WA.** Conservation Committee of the Audubon Society. Appreciate the extension of the trail systems. Completely supportive of the biodiversity in the plan, and in the appendix the Stewardship plan. Agrees that biodiversity fits into the plan, such as protecting the buffer along the trail during development. He works with residents on how they may like to enhance their own little backyard biodiversity with rain barrels or birdhouses, for example. He is in support, when possible, of keeping land in its own natural state versus paving over and then recreating natural spaces.

43-1

**Jeanne Fancher, 31248 55th Ave. S, Pacific, WA.** She represents The Friends of the Lower White River. She commented that people her age probably played in a forest full of biodiversity and didn't realize it. Biodiversity is basically a measure or a word for a lot of plants and animals that are a part of a natural state. She pulled a definition from a brochure that was produced by Pierce County Planning & Land Services. "Biodiversity is the degree of variation of life forms within a given ecosystem, habitat area or an entire planet. Biodiversity is one measure of health of an ecosystem. The term is most commonly used to describe species diversity and species richness." She stated there are 16 Biodiversity Management Areas with connecting corridors that cover 260,000 acres of land, 250 vertebrate species, including 25 at risk, 38 listed as threatened or endangered, 43 on the Priority Habitat and Species List, 18 fish species, and 80 species of butterflies. Biodiversity is a way of honoring or protecting the areas to pass along to our children.

44-1

### **3. Staff Report- 3 (Capital Facilities, Family & Human Services, Shoreline Master Program)**

WINDISH discussed key parts of the following three Elements.

**Capital Facilities and Public Services Element** proposal. *Police Level of Service:* The current LOS requires 2 police officers for every 1,000 people in the city. However, increased population doesn't always mean an increased need for officers and really depends on demographics of population, number of calls for service and other factors. The Police Department made some recommendations to address this issue. *East Pierce Fire and Rescue:* The City merged with East Pierce Fire and Rescue in 2009 and proposed Policy 1.3 and sub-policies refer to East Pierce Fire & Rescue's level of service. *Budgeting:* The proposed Policy 1.12.1 addresses the tie between the capital facilities policies and the city budget.

**Family and Human Services Element** proposal. The *Healthy Lifestyles* section includes a New Goal 4 and associated policies that would address some healthy lifestyle issues, essentially promoting healthy and active lifestyles in the community.

**Shoreline Master Program Element** proposal. The GMA requires the Comprehensive Plan and SHORELINE Master Program be consistent. There are discrepancies within the two documents. Goal 4 contains minor housekeeping amendments to clear these up.

SWANSON invited those in the audience to speak. There was no public comment.

#### **e) Planned Action Ordinance**

**Jeff Arango, BERK Consulting, Seattle, Washington.** He spoke as a Consultant for the City. He presented the Planned Action Ordinance and explained the benefits of making it simpler and faster to complete projects if they have been approved through a Planned Action Ordinance. At the time of development it is a simple checklist when project comes in. There are certain numbers of vehicle trips, jobs, etc., during a project. This process looks at the whole neighborhood up front versus small individual projects. There are still the normal permitting processes, Notice of Application to the public, and public comment on the proposal and regular processes. The Ordinance has been drafted based on Alternative #3 in the EIS and comments on this area still being accepted until April 24.

WINDISH asked if he could clarify the thresholds when something comes in and would require additional review.

ARANGO gave an example of how a threshold would work.

SWANSON asked for a definition of SEPA.

ARANGO explained State Environmental Protection Act (“SEPA”), and that the City has several areas to look at for environmental protections for its citizens.

SWANSON asked for any further questions or public comment. There were none.

#### **b) Development Regulations.**

WINDISH explained all of the changes would be presented as a package and he would provide a summary of the proposed amendments. The City needs to be able to develop a "wetland mitigation bank". He briefly addressed all proposed amendments A-H with a summary of the key changes.

SWANSON asked for any further questions or public comment. There were none.

#### **c) Transportation Plan.**

MENDENHALL explained the last update was several years ago. He presented the Draft Transportation Plan via slide show. Key points included: A passing grade is a D for intersections. They created a chart of proposed transportation projects which was provided in paper for the public and Commissioners. There is a map created based off of the spreadsheet of projects showing where they are located in the system. He focused his comments on the East Sumner Neighborhood Plan, as most of the public is probably interested in this. The City is working with WSDOT to possibly connect up at 64th Street with an off-ramp, especially with the YMCA coming and future businesses there is demand. They are looking at closing 60th at Sumner-Tapps Hwy, but retaining a pedestrian bridge over the creek for a pedestrian crossing for evacuation. Looking at the intersections that are potentially not meeting the needs now or in the near future. Also looking at the potential for funding. He discussed the Transportation Impact Fee, current = \$1,165. Proposed fee = \$2,376. Less than other cities charge. The City is in the lower to mid-

range with our neighbors. The money goes to help pay for the improvements to streets caused by impacts from new development. This is per home and goes into the building permit process. When a new subdivision goes in, there are concerns about pedestrian safety. Southern Sumner to Downtown Sumner is not very safe. Orting Highway is maintained by WSDOT. The City fronts the money. He explained the Sumner Avenue Pedestrian Bridge total cost to Sumner is \$1.5 million. Hopefully the City could get a grant for \$1 million and the City would collect fees for the rest.

WINDISH added the breakdown is \$6 million for 62nd street, \$1 million in grants, \$4 million in LID- property owners, and \$1 million from Impact Fees. The YMCA is involved in the costs.

BUSH asked to have clarification on which area has the lowest service, and what is priority, besides the East Sumner area.

MENDENHALL responded that there is a map in the DRAFT Transportation Plan. The spreadsheet lists them out as H- high, M - medium, L-low priorities. A map can be provided to all.

WINDISH added high priority has to do with key access to the highway, or with funding. Wanted to mention, Parker Road and East Main intersection is a high priority as well. There is already underground conduit in place from improvements made in 1994. Public Works has to wait until the need is warranted.

ROBBERT asked about Multi-Family and Neighborhood Commercial classifications.

WINDISH explained it could be an either or, depending on what is the best use of the property.

SWANSON invited public comment.

**Linda Burgess, 12822 51st St. E., Edgewood, WA.** She asked if there a priority for looking at railroad crossings? From West Valley Highway at the Cannery, for example. With the length of trains and rush hour traffic, she wondered if there is a way to mitigate that. The concern is the no right-hand turn on red, people don't see it. There were changes recently, and it changed again. She hopes the City is looking at something there.

45-1

**Randall Adams, 15013 63rd St. Ct. E., Sumner, WA.** Had several questions. He wanted to know why the City is dumping commercial fees. What changed and what made this so important? Did we get too much money from the sale of the golf course, does the City have too much money? Why when reducing at the parking spaces from 1.5 to 1.2, what caused the need for that? To be like Seattle? Why do we have to be one of the lowest Impact Fees in the area? Bonney Lake's fees are higher than Sumner's. He suggested getting money out of the commercial pockets, not the City's. He sought clarification on the location of the proposed park in the East. He was curious how the City got people to change the stream. He wondered how and why, referring to Salmon Creek. He is curious about what the impact may be north of Main based on what the City has done. He asked for a definition of Mixed-Use. He feels there is

46-1

enough commercial north of town. He expressed how he thought the original plan out there was to be for family homes.

SWANSON turned the response over to staff.

WINDISH responded that he would prefer to meet with Mr. Adams one on one, in the interest of time.

ADAMS commented that he thinks the people would like to hear the answers.

WINDISH would rather not go into answering all the questions at this meeting and there have been several meetings addressing these concerns. He repeated that the deadline is April 24th for the public to comment. Staff and consultants will respond to every comment. That document is made public. The comments don't stop there with staff. They really do accept comments all the way to the City Council.

SWANSON reminded the public that the job of the Planning Commission is to collect information.

STOREY encouraged Adams by stating she hopes not receiving direct comments doesn't deter him from seeking information in written form. Encouraged him to go to his Council.

#### **d) Critical Areas Regulations**

MENDENHALL explained that the City hired a consultant to look at the current regulations. The floodplains and wetlands are the two biggest areas. The buffers are recommended to be modified. Category #1, bogs, estuaries. Category #4 out in a pasture, not providing water quality or functions. We have one Category #2 identified, King County owns the land. The rest of the wetlands are either #3 or #4. The #3 could be decreased with new regulations. #4 would be increased. Currently have 75 feet, could reduced to 60 feet. The guidance and suggestions comes from the Department of Ecology. Currently there would be a variance process and need to go before the Hearing Examiner just to build a home if along a buffer.

STOREY inquired about properties off of Main Street going South, how they can be wet at time in the East Sumner Neighborhoods. She asked what they are classified as.

MENDENHALL responded that it is a Category #3 wetland. The plan would be to fill that wetland and mitigate it to the river. The roadway would be the biggest impact to it and the use of an LID to support the situation.

#### **SWANSON moved onto Public Comment.**

**Jeanne Fancher, 31248 55th Ave. S, Pacific, WA.** During the incubation period of salmon, wonders how mitigating that project down south is going to provide the water that the salmon need. She wanted to know how the City will get the water for the salmon. She commented that on a positive side, the White River Bridge widening was a chokepoint, that is why there was four

feet of water on golf course. The \$12 million will hopefully lengthen the bridge and reduce the choking.

MCDERMOTT stated at the last meeting a man spoke about how the rainwater would not make it to the creek. He asked staff to speak to how it will still make it to the creek.

MENDENHALL responded the City and State-wide jurisdictions require a storm-water report. They show how the project will address the stormwater with impervious surfaces. The first requirement is the low-impacts, like rainwater. Any City-wide project has to go through a stormwater facility, detained and then drained off. Most will infiltrate naturally. It is a delayed rate, similar to the natural rate of discharge in the area. Salmon Creek is the overflow from Eli Creek.

MCDERMOTT asked for clarification of what is meant by the word 'treated'.

MENDENHALL explained it is a pollution generated surface. A roof is not a pollution generated surface, it is run off. A parking lot has oils, metallic disc brake residue, therefore that water needs to be treated. It is needs to be slowed down and given time to allowed it to fall out, through rock material and further filters and cleans it, prior to being allowed to go back into the ground. The City has an intern that tests all storm water drains ensuring that they are working. The water in the storm water is actually cleaner than the waste water treatment water. He added the the City's Wastewater Treatment water is cleaner than the river.

#### **f) Capital Facilities Plan**

WINDISH explained this plan includes multiple plans within the City. An inventory is done from all the facilities. It is more about buildings, pavement, infrastructure. The Level Of Service of Police or Parks, for example, you could say for every 2,000 people there needs to be 2 parks. Over time, you can see if you are meeting the needs for the community. There are financial plans for each of those plans. In regards to where the funding comes from, for example, instead of two officers versus the population, it would include the calls for service. For fire, they are looking at response time. This plan allows Levels of Service to play a role. It draws from plans that are already in place, as a budgeting tool for a six year plan and allows the Council to use this as a planning tool.

SWANSON asked if the dollar amounts in the Transportation Plan on page 128 are surplus amounts.

MENDENHALL explained that the small print states they are other jurisdictions' cost to a project and does not accurately depict surplus to Sumner. It really won't be a surplus, as it may appear to represent.

WINDISH commented on a previous question Bush asked about priorities. Development needs to pay its portion, no doubt. But the City doesn't want to discourage development due to high fees. The Planning Commission could recommend a lower or higher impact fee. That is something the Commissioners can be thinking about.

SWANSON noted the Staff Reports concluded. He asked for any last public comments. There were none.

**SWANSON officially closed the Public Hearing.**

### **CORRESPONDENCE**

WINDISH commented he did receive additional letters and will provide what was received at the next meeting.

### **COMMISSION COMMENTS**

STOREY appreciates that the public come out and speak to the Planning Commission. They want to know the thoughts of the people. Anything the Planning Commission does needs comments from public and citizens of Sumner.

BUSH seconds what Storey stated, feels the same. Question for staff as she is aware there are legal restraints for Commissioners. What can they discuss with the public, legally?

WINDISH thanked Bush for her question. Currently there are six individual parcels with map amendments. Ex parte' communications with anyone is not acceptable. Must disclose that. The East Sumner Neighborhood Plan is perfectly acceptable to discuss with anyone.

### **Staff Comments**

WINDISH reminded Commissioners about the April 16th Study Session. Public is invited to listen and is another opportunity to go over material. April 24th will mark the 60 day comment period deadline.

MCDERMOTT suggestion moving the Study Session to April 24th to coincide with the deadline of the closing of public comments.

WINDISH would have to check with the City's Communications Officer. The meetings and Study Sessions dates and times have been published and posted for the public. It might be very complicated to make a change at this time.

SWANSON commented there has been much work done. He thanked the public for all of the work they have done and for coming out to the Public Hearing. He thanked staff for all of the preparation of the documents.

### **ADJOURNMENT**

SWANSON adjourned the meeting at 8:43 p.m.

*Taryn Capps*  
*Minutes Taker*

Sumner Planning Commission  
Regular Meeting Minutes 4-2-15





## 5.0 REFERENCES

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

City of Sumner. 2015. East Sumner Zoning Map. Email from Ryan Windish to Jeff Arango. July 6, 2015.  
City of Sumner, WA

City of Sumner and MAKERS Architecture. 2015. *East Sumner Neighborhood Plan*. City of Sumner, WA.



## 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.

**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 16.04.170 of the Sumner Municipal Code (SMC) allow for and govern the adoption and application of a planned action designation under SEPA; and

WHEREAS, the Washington 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 July 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 (DSEIS) issued on February 24, 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 Growth Management Act (GMA).
- C.** The City has adopted a Comprehensive Plan complying with the GMA and an associated subarea plan with 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 an urban growth area (UGA).

**L.** Implementation of the mitigation measures identified in the Planned Action SEIS and the East Sumner Neighborhood Plan Update, and Capital Facility Plan and Transportation Plan Update 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 Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action SEIS. The mitigation measures contained in Exhibit B of this Ordinance are based upon the findings of the 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 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	Preferred Alternative
New Housing Units	439
New Employment (Jobs)	529

(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 Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action 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**

**Preferred Alternative**

	Net Increase in PM Peak Hour Trips
Preferred East Sumner	1,571

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 Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action 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 Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action 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 and East Sumner Neighborhood 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 Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action 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;
  - (c) provide a conceptual site plan to scale and narrative documenting how the planned action project meets the requirements of this Ordinance and the East Sumner Neighborhood Plan as well as relevant Sumner Municipal Code requirements. The written summary shall in particular identify the consistency of the Planned Action Project application with the East Sumner Neighborhood Plan “Plan Elements” concepts and strategies. and
  - (d) 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 RCW 43.21c.440.

(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 subject to the procedures established in Title 18 SMC. An appeal of a Determination of Consistency shall be consolidation with any pre-decision or appeal hearing on the underlying project application where applicable.

**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 Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action 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 Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Municipal Code Update, and East Sumner Neighborhood Planned Action 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 27th day of July, 2015.

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Mayor David L. Enslow

ATTESTED:

PUBLISHED: XXX, 2015

EFFECTIVE: XXX, 2015

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City Clerk Terri Berry, MMC

*First Reading:*

*Second Reading:*

*Date Adopted:*

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*Date of Publication:*

*Effective Date:*

APPROVED AS TO FORM:

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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 (see **Exhibit A**) 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. 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 the East Sumner Neighborhood Plan, 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.			
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"/> Single Family or 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 439		Dwelling Bank Remainder as of _____20__ _____dwellings
Non-residential Uses: Building Square Feet	Existing Square Feet:		Proposed Square Feet:
	New Employment (Jobs) 529 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		Jobs Remainder as of _____20__ _____ jobs
Building Height	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: 1,571		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><b>STAFF COMMENTS:</b></p>
<p>2. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling or 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"> <li><input type="checkbox"/> Landslide Hazards</li> <li><input type="checkbox"/> Erosion Hazards</li> <li><input type="checkbox"/> Seismic Hazards</li> <li><input type="checkbox"/> Liquefaction Hazards</li> <li><input type="checkbox"/> Volcanic Hazards</li> <li><input type="checkbox"/> Other: _____</li> </ul> <p>Describe:</p>	
<p>4. Are there surface indications or history of problem soils in the immediate vicinity? If so, describe.</p>	
<p>5. Proposed Measures to control impacts to earth, soils, and geologic hazardous areas:</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"> <li><input type="checkbox"/> Compliance with City Erosion Control Ordinance (SMC 16.05).</li> <li><input type="checkbox"/> Compliance with Critical areas regulations within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas (SMC 16.50, 16.52, and 16.54)</li> <li><input type="checkbox"/> Pre-loading, foundation and footing system design considerations, parking area asphalt design, and compliance with the International Building Code standards (SMC 15.08.010).</li> <li><input type="checkbox"/> Other: _____</li> </ul>	
<b>Flooding Checklist and Mitigation Measures</b>	
<p>1. Description of Conditions</p> <p>A. Is the project site within a designated floodplain? If so, describe the type and extent of the designated floodplain:</p>	<b>STAFF COMMENTS:</b>
<p>2. Is development proposed within the designated floodplain? If so, explain in more detail:</p>	
<p>3. Are there indications of past flooding on the property?</p>	
<p>4. Proposed Measures to control impacts to flooding:</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"> <li><input type="checkbox"/> Compliance with the National Flood Insurance Program (NFIP) Standards.</li> <li><input type="checkbox"/> Compliance with Washington State Department of Ecology Low Impact Development Manual Compliance</li> <li><input type="checkbox"/> Compliance with the Shoreline Master Program and Critical Areas Regulations.</li> <li><input type="checkbox"/> District Stormwater Facilities Constructed.</li> <li><input type="checkbox"/> 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.</li> </ul>	

Plants and Animals Checklist and Mitigation Measures	
<b>Plants and Habitat Checklist</b>	<b>STAFF COMMENTS:</b>
1. Check or circle types of vegetation found on the site: <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> <ul style="list-style-type: none"> <li><input type="checkbox"/> City of Sumner Shoreline Master Program (SMP).</li> <li><input type="checkbox"/> National Flood Insurance Program (NFIP) and compliance with the Biological Opinion.</li> <li><input type="checkbox"/> Critical Area Regulations that address wetlands, streams and wildlife habitat areas.</li> <li><input type="checkbox"/> City of Sumner stormwater regulations and implementation of the National Pollutant Discharge Elimination System (NPDES) requirements.</li> <li><input type="checkbox"/> Restoration of select locations along Salmon Creek.</li> <li><input type="checkbox"/> Other: _____</li> </ul> <p>Describe:</p>	<p><b>STAFF COMMENTS:</b></p>
<p><b>Fish and Wildlife</b></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> <ul style="list-style-type: none"> <li><input type="checkbox"/> Birds: Hawk, heron, eagle, songbirds, other: _____</li> <li><input type="checkbox"/> Mammals: Deer, bear, elk, beaver, other: _____</li> <li><input type="checkbox"/> Fish: Bass, salmon, trout, herring, shellfish, other: _____</li> </ul>	
<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).
- National Flood Insurance Program (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:

<b>Water Resources</b>	
<p>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)?</p> <p>If yes, describe type of surface water body, including their name(s), stream classification, and whether there is a 100-year floodplain.</p> <p>If appropriate, state what stream or river the surface water body flows into.</p>	<b>STAFF COMMENTS:</b>
<p>2. Will the proposal require or result in (check all that apply and describe below):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> any work over, in, or adjacent to (within 200 feet) the described waters?</li> <li><input type="checkbox"/> fill and dredge material that would be placed in or removed from surface water or wetlands?</li> <li><input type="checkbox"/> surface water withdrawals or diversions?</li> <li><input type="checkbox"/> discharges of waste materials to surface waters?</li> <li><input type="checkbox"/> groundwater withdrawal or discharge?</li> <li><input type="checkbox"/> waste materials entering ground or surface waters?</li> <li><input type="checkbox"/> alterations of effects upon drainage patterns in the vicinity of the site?</li> </ul>	

Describe:	
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"> <li><input type="checkbox"/> Compliance with critical area regulations.</li> <li><input type="checkbox"/> Compliance with SMC 13.48: stormwater management regulations.             <ul style="list-style-type: none"> <li><input type="checkbox"/> 2012 Washington State Department of Ecology Stormwater Management Manual for Western Washington.</li> <li><input type="checkbox"/> NPDES Western Washington Phase II Municipal Stormwater Permit, - Minimum Technical Requirements for New Development and Redevelopment.</li> <li><input type="checkbox"/> 2005 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound.</li> </ul> </li> <li><input type="checkbox"/> Compliance with Shoreline Master Program (SMP).</li> </ul>	
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.	<b>STAFF COMMENTS:</b>
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"> <li><input type="checkbox"/> Compliance with Washington Department of Ecology and Puget Sound Clean Air Agency Regulations</li> <li><input type="checkbox"/> Compliance with Commute Trip Reduction Ordinance.</li> <li><input type="checkbox"/> Air quality control plans for construction activities.</li> <li><input type="checkbox"/> Best Management Practices used to control fugitive dust.</li> <li><input type="checkbox"/> Measures to minimize air quality and odor issues caused by tailpipe emissions mobile construction equipment and portable stationary engines.</li> <li><input type="checkbox"/> Use of Greenhouse Gas Reduction Measures per Municipal Code or Exhibits 3-14 and 3-15 of Draft SEIS.</li> <li><input type="checkbox"/> Other: _____</li> </ul>	
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<b>Land Use and Plans and Policies Checklist</b>	
1. What is the current use of the site and adjacent properties? (Add more explanation as needed beyond description in Part A.)	<b>STAFF COMMENTS:</b>
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, including the East Sumner Neighborhood Plan.
- 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?

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2. Approximately how many people would the completed project displace?

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3. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

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4. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

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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, including the East Sumner Neighborhood Plan.
- Consistency with applicable zoning standards and design guidelines.
- Other: \_\_\_\_\_

Describe these measures and how they are incorporated into the development:

**STAFF COMMENTS:**

<b>Public Services, Capital Facilities, and Utilities Checklist</b>	
1. Police Protection: Would the project increase demand for police services? Can City levels of service be met?	<b>STAFF COMMENTS:</b>
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?	
<p>9. Proposed measures to reduce or control direct impacts on public services.</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"> <li><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).</li> <li><input type="checkbox"/> Fire Services: Mitigation agreement between the developer and Sumner Fire &amp; Rescue.</li> </ul>	

<ul style="list-style-type: none"> <li><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.</li> <li><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.</li> <li><input type="checkbox"/> Compliance with SMC 13.48: stormwater management regulations.</li> <li><input type="checkbox"/> Other Measures to reduce or control public services and utilities impacts: _____</li> </ul> <p>Describe:</p>	
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<b>Parks and Recreation Checklist</b>	
1. What designated and informal recreational opportunities are in the immediate vicinity?	<b>STAFF COMMENTS:</b>
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> <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliance with Parks and Open Space Plan Update.</li> <li><input type="checkbox"/> Payment of a parks and recreation mitigation or impact fee.</li> <li><input type="checkbox"/> Other Measures to reduce or control parks and recreation impacts: _____</li> </ul> <p>Describe:</p>	

<b>Transportation Checklist</b>	
1. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.	<p><b>STAFF COMMENTS:</b></p> <p>Verify that:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 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.</li> <li><input type="checkbox"/> The City has verified incremental and total trip generation.</li> </ul>
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.	
<p>6. Proposed measures to reduce or control transportation impacts, if any:</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"> <li><input type="checkbox"/> 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).</li> <li><input type="checkbox"/> Installation of required improvements necessitated by development or that are part of Planned Action.</li> <li><input type="checkbox"/> Fair share contribution to improvements at City concurrency intersections and roads.</li> <li><input type="checkbox"/> Other measures to reduce or control transportation impacts: _____</li> </ul> <p>Describe:</p>	

<b>Other Environmental Topics: City of Sumner 2010 Comprehensive Plan Update and Amendments EIS, November 2010</b>	
<b>Environmental Health and Noise Checklist and Mitigation Measures</b>	
1. Describe any known or possible contamination at the site from present or past uses.	<b>STAFF COMMENTS:</b>
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.	
<p>6. Proposed measures to reduce or control environmental health hazards, if any:</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"> <li><input type="checkbox"/> SMC Chapter 15.24 Fire Code</li> <li><input type="checkbox"/> SMC Chapter 13.48 Illicit Discharge and/or Dumping Detection and Elimination</li> <li><input type="checkbox"/> Model Toxics Control Act Chapter 70.105D RCW</li> <li><input type="checkbox"/> Uniform Environmental Covenants Act Chapter 64.70 RCW</li> <li><input type="checkbox"/> MTCA Cleanup Regulation Chapter 173-340 WAC</li> <li><input type="checkbox"/> Compliance with SMC Chapter 8.14 Noise Control measures for compatibility.</li> <li><input type="checkbox"/> Other: _____</li> </ul>	
<b>Historic and Cultural Preservation</b>	
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.	<b>STAFF COMMENTS:</b>

<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"> <li><input type="checkbox"/> Condition to stop construction if remains of historic or archeological significance are found.</li> <li><input type="checkbox"/> Consultation with the Washington State Department of Archaeology and Historic Preservation.</li> <li><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</li> </ul> <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.

<b>Signature:</b>	
<b>Date:</b>	

## 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.

<b>Criteria</b>	<b>Describe how your application and proposed development meets the criteria.</b>
(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.	



<b>Criteria</b>	<b>Describe how your application and proposed development meets the criteria.</b>
(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.

DRAFT

<b>Requirement</b>	<b>Staff Comments</b>
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**

DRAFT

**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.

<b>SEPA Responsible Official Signature:</b>	
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<b>Date:</b>	
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**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:

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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:

<b>SEPA Responsible Official Signature:</b>	
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<b>Date:</b>	
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# 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

#### Earth

- Conditions of approval for development 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.

#### Plants and Animals

- Mitigation for the new street(s) and infrastructure improvements is included in the Preferred Alternative. It includes establishment of a wetland mitigation bank within public property south of 24<sup>th</sup> 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. Applicants shall utilize the off-site wetland bank or provide on-site mitigation for impacts to plants and animals consistent with the City’s critical area regulations and mitigation sequencing requirements.

#### Air Quality and Greenhouse Gases

- All construction contractors are required to implement air quality control plans for construction activities in the study area. The air quality control plans include Best Management Practices to control fugitive dust and odors emitted by diesel construction equipment.
- The following Best Management Practices shall be used to control fugitive dust:

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- 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.
- Minimize air quality and odor issues caused by tailpipe emissions maintaining the engines of construction equipment according to manufacturers' specifications and minimizing idling of equipment while the equipment is not in use
- Burning of slash or demolition debris is not be permitted without express approval from the Puget Sound Clean Air Agency.
- Table B.1.1 *Other Potential GHG Reduction Mitigation Measures* lists a variety of mitigation measures that 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. The City SEPA Responsible Official or his/her designee shall require development applicants to consider the reduction measures shown in in Table B.1-1 *Other Potential GHG Reduction Mitigation Measures* and Table B.1-2 *Emission Reduction Measures* for their projects and identify which measures are feasible and incorporated into their projects, and which measures are infeasible together with a rationale and explanation. The City SEPA Responsible Official or his/her designee may condition development applications to incorporate GHG reduction measures found to be feasible.

Table B-1.1. Other GHG Mitigation Measures for Consideration

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

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Conduct third-party building commissioning to ensure energy performance.	Reduces fuel combustion and purchased electricity consumption.
Track energy performance of building and develop strategy to maintain efficiency.	Reduces fuel combustion and purchased electricity consumption.
<b>Transportation</b>	
Size parking capacity to not exceed local parking requirements and, where possible, seek reductions in parking supply through special permits or waivers.	Reduced parking discourages auto-dependent travel, encouraging alternative modes such as transit, walking, and biking. Reduces direct and indirect VMT.
Develop and implement a marketing/information program that includes posting and distribution of ridesharing/transit information.	Reduces direct and indirect VMT.
Subsidize transit passes. Reduce employee trips during peak periods through alternative work schedules, telecommuting, and/or flex time. Provide a guaranteed-ride-home program.	Reduces employee VMT.
Provide bicycle storage and showers/changing rooms.	Reduces employee VMT.
Use traffic signalization and coordination to improve traffic flow and support pedestrian and bicycle safety.	Reduces transportation emissions and VMT.
Apply advanced technology systems and management strategies to improve operational efficiency of local streets.	Reduces emissions from transportation by minimizing idling and maximizing transportation routes/systems for fuel efficiency.
Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Reduces idling fuel emissions and direct and indirect VMT.
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 Table B-1.1, 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, Table B-1.2 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.

## CITY OF SUMNER – EAST SUMNER NEIGHBORHOOD PLANNED ACTION ORDINANCE

Table B-1.2 Emission Reduction Measures

Measure Number	Title	Description	Range of Effectiveness
<b>Transportation</b>			
TRT-1	Voluntary Commute Trip Reduction	A successful program will include all of the following: carpooling encouragement; ride-matching assistance; preferential carpool parking; flexible work schedules for carpools; half-time transportation coordinator; vanpool assistance; bicycle end-of-trip facilities.	1.0 – 6.2%
TRT-11	Provide Employer-Sponsored Vanpool/Shuttle	A successful program will entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at least program administration, if not more. The driver usually receives personal use of the van, often for a mileage fee.	0.3 – 13.4%
<b>Building Energy</b>			
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 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.	BMP – In order to take 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)
<b>Alternative Energy</b>			



**Table B-1.2 Emission Reduction Measures**

Measure Number	Title	Description	Range of Effectiveness
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
<b>Water Use</b>			
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%
<b>Vegetation</b>			
V-1	Urban Tree Planting	Planting trees sequesters CO <sub>2</sub> while the trees are actively growing. The amount of CO <sub>2</sub> sequestered depends on the type of tree. Typically, the active growing period of a tree is 20 years and after this time the amount of carbon in biomass slows and will be completely offset by losses from clipping, pruning, and occasional death.	Variable by number of trees

Source: California Air Pollution Control Officers Association, 2010.

### **Public Services, Capital Facilities and Utilities**

- The City shall require new development to design street layouts and recreation areas that promote visibility for residents and police. Street and sidewalk lighting and safety measures for vehicles, cyclists, and pedestrians shall be implemented per the Sumner Municipal Code and to meet Crime Prevention through Environmental Design principles.
- To address water quantity the City may choose to implement regional control stormwater facilities that would require applicants to unless determined by the City to be infeasible. Creating a downstream regional flow control facility to serve the study area, if pursued by the City, would require additional study and analysis to verify feasibility, preparation of regional facility basin plan for review by Ecology, environmental analysis and permitting, and final design and construction. If a regional flow control facility is approved by the City, an applicant may request or the City may condition development to pay a fee based on the area of new and replaced impervious surface. If regional facilities are not available then applicants shall comply the City adopted version of the Stormwater Manual for Western Washington. All applicants shall provide on-site facilities to address water quality in accordance with the City adopted version of the Stormwater Manual for Western Washington.

**Transportation**

- An updated section of the Sumner Municipal Code (18.30.100) addresses future street improvements in the Planned Action Area and applicants must comply with the required standards.

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## **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.

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**Table B-2.1. Applicable Regulations and Commitments**

Topic	Regulation/Commitment
Earth	<ul style="list-style-type: none"> <li>● The City has adopted the International Building Code (SMC 15.08.010) and a City Erosion Control Ordinance (SMC 16.05) to reduce impacts caused by earthquakes, soil instability and erosion.</li> <li>● 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.)</li> </ul>
Flooding	<ul style="list-style-type: none"> <li>● The City implements requirements of the National Flood Insurance Program to protect new and existing development in and near floodplains (SMC 15.52).</li> <li>● The City has adopted the 2005 Washington State Department of Ecology Low Impact Development Manual (LID) and a requirement for LID approaches to stormwater management for new development.</li> <li>● The City enforces the Shoreline Master Program (SMC 16.08, 16.12, 16.14, 16.16, 16.20, 16.24, 16.28, 16.30, 16.32, and 16.36) and critical area regulations (SMC 16.05, 16.46, and 16.48).</li> </ul>
Plants and Animals	<ul style="list-style-type: none"> <li>● City of Sumner Shoreline Master Program (SMC 16.08, 16.12, 16.14, 16.16, 16.20, 16.24, 16.28, 16.30, 16.32, and 16.36)</li> <li>● National Flood Insurance Program and compliance with the National Marine Fisheries Service 2008 Biological Opinion for Puget Sound</li> <li>● Critical Area Regulations address wetlands, streams and wildlife habitat areas (SMC 16.05, 16.46, and 16.56).</li> <li>● City of Sumner stormwater regulations and implementation of the National Pollutant Discharge Elimination System requirements</li> </ul>

**Table B-2.1. Applicable Regulations and Commitments**

Topic	Regulation/Commitment
Water Resources	<ul style="list-style-type: none"> <li data-bbox="397 321 1409 537">● Critical Areas Regulations. The City’s critical area regulations provide provisions for the protection of wetlands, aquifer recharge areas, and buffer zones around local rivers and streams. SMC 16.05 regulates erosion and sedimentation to reduce sediment pollution from construction activity. SMC 16.48 regulates development and land use in aquifer recharge areas. SMC 16.46 regulates development in or near wetlands and mitigation for wetland filling.</li> <li data-bbox="397 562 1409 848">● Stormwater Management. Water quality protection is enacted by SMC 13.48. 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, the NPDES Western Washington Phase II Municipal Stormwater Permit, - Minimum Technical Requirements for New Development and Redevelopment, and the 2005 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound.</li> <li data-bbox="397 873 1409 1014">● Shoreline Master Program. The City of Sumner updated and adopted a revised Shoreline Master Program in December 2014 (SMC 16.08, 16.12, 16.14, 16.16, 16.20, 16.24, 16.28, 16.30, 16.32, and 16.36). The revised SMP regulates approximately six miles of the White River and 1.5 miles of the Puyallup River.</li> <li data-bbox="397 1039 1409 1287">● Safe Drinking Water Act. Requires public water system wells 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.</li> </ul>

**Table B-2.1. Applicable Regulations and Commitments**

Topic	Regulation/Commitment
Air Quality and Greenhouse Gases	<ul style="list-style-type: none"> <li>● National Ambient Air Quality Standards (NAAQS). The EPA establishes NAAQS and specifies dates for states to develop and implement plans to achieve these standards.</li> <li>● State Ambient Air Quality Standards. The Washington State Department of Ecology establishes state ambient air quality standards for the same six pollutants that are as stringent as the national standards; in the case of SO<sub>2</sub>, state standards are more stringent.</li> <li>● 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; and special attainment area provisions.</li> <li>● Outdoor Burning. Burning yard waste and land-clearing debris is not allowed in the City of Sumner or in Pierce County. PSCAA enforces state outdoor burning regulations required by RCW 70.94.743.</li> <li>● 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.</li> <li>● State of Washington GHG Laws. Washington enacted a new law establishing GHG reduction limits.</li> <li>● City of Sumner Ordinance 1587. This ordinance requires affected employers (employers with 100 employees or more at a single worksite) to implement a Commute Trip Reduction program for their employees. (SMC 16.06)</li> </ul>

**Table B-2.1. Applicable Regulations and Commitments**

Topic	Regulation/Commitment
Land Use Plans & Policies	<ul style="list-style-type: none"> <li>● Design review is required for all new multifamily, commercial, and industrial developments; the review must consider the context of the site and potential for incompatibility. (SMC 18.40)</li> <li>● City of Sumner’s Zoning Code (Title 18): development is subject to setback, buffer and landscaping requirements to minimize impacts on adjacent land uses, particularly between commercial/industrial and residential development.</li> <li>● Certain land uses are subject to conditional use review, which includes a more detailed review of land use compatibility. (SMC 18.48)</li> <li>● The Sumner Zoning Code (Title 18) includes zoning and design standards intended to allow for compatible development.</li> <li>● 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</li> <li>● 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</li> <li>● The Town Center Plan guides development in the downtown.</li> <li>● The Design and Development Guidelines ensure detailed site, building, and parking design is consistent with the City’s vision. (SMC 18.40)</li> <li>● The Shoreline Master Program addresses development and land use within 200’ of shorelines of the state (SMC 16.08, 16.12, 16.14, 16.16, 16.20, 16.24, 16.28, 16.30, 16.32, and 16.36).</li> </ul>
Population, Employment, and Housing	<ul style="list-style-type: none"> <li>● Zoning regulations implement the City Comprehensive Plan to further its policies for business development, population and residential growth, and community character. (SMC Title 18)</li> <li>● The City’s zoning code furthers Comprehensive Plan policies for housing density, types of housing, and character. (SMC Title 18)</li> </ul>
<b>Public Services and Utilities:</b>	
Law Enforcement	<ul style="list-style-type: none"> <li>● The Sumner Police department enforces various City regulations such as Title 9 Criminal Code and Title 10 Vehicles and Traffic.</li> </ul>

**Table B-2.1. Applicable Regulations and Commitments**

Topic	Regulation/Commitment
Fire and Emergency Medical Services	<ul style="list-style-type: none"> <li>● EPF&amp;R has adopted response time objectives and prepares regular reports.</li> <li>● The City and EPF&amp;R will continue to work with mutual aid partners for backup response to emergency incidents.</li> <li>● All new development is required to meet City development regulations as well as the International Building Code and International Fire Code.</li> <li>● National and state industry standards address fire district response times and staffing minimums (Fire Protection Association Standard 1710 and State’s Labor &amp; Industries safety requirements (WAC 296-305-05001).</li> </ul>
Schools	<ul style="list-style-type: none"> <li>● 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. (SMC 3.50)</li> </ul>
Sewer	<ul style="list-style-type: none"> <li>● 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.</li> <li>● 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.</li> <li>● The City manages its sewer system under Sumner Municipal Code Title 13, Public Services.</li> </ul>
Water	<ul style="list-style-type: none"> <li>● The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years.</li> <li>● Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater.</li> <li>● The City has adopted the 2009 Water System Plan Update and 2010 Water System Plan Revisions.</li> </ul>



**Table B-2.1. Applicable Regulations and Commitments**

Topic	Regulation/Commitment
Stormwater	<ul style="list-style-type: none"> <li>● Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls.</li> <li>● The City has adopted stormwater standards requiring, among other things, 25-year storage with the 2-year predevelopment release rate.</li> <li>● 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.</li> <li>● The City should implement the capital improvement projects described in the 2011 Stormwater Comprehensive Plan.</li> <li>● The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program.</li> </ul>
Solid Waste	<ul style="list-style-type: none"> <li>● The City participates in an interlocal agreement with Pierce County for solid waste and recycling services.</li> </ul>
Utilities	<ul style="list-style-type: none"> <li>● The City should continue to implement the Washington State Energy Code.</li> </ul>
Parks and Recreation	<ul style="list-style-type: none"> <li>● The City collects a SEPA mitigation fee for parks and trails in the following amounts: for parks a \$214 per dwelling units for residential development and \$91 per employee for commercial/industrial development; for trails a mitigation fee of \$204 per dwelling unit for residential development and \$86 per employee for commercial/industrial development. The City may amend its PROS Plan and establish new fees applicable in the City and East Sumner.</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>● 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.</li> <li>● The City implements Chapter 16.06 Commute Trip Reduction. The Transportation Plan Update will expand on Transportation Demand Management Measures.</li> <li>● The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places.</li> </ul>

## 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.

## CITY OF SUMNER – EAST SUMNER NEIGHBORHOOD PLANNED ACTION ORDINANCE

Table C.1. Public Agency Mitigation Measures

Mitigation Measures	Proposed Synchronous Amendments	Short Term: Within 5 years	Long Term	Other Agency	Responsible Department
<b>Earth:</b>					
The City could continue to maintain 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.			X Ongoing		Community Development, Public Works
The City could pursue implementation of mitigation measures outlined in the Pierce County Natural Hazard Mitigation Plan.		X			Public Works, Community Development
<b>Flooding:</b>					
The City should implement a zero-rise policy for development in floodways and floodplains.		X			Community Development
The City should add new Comprehensive Plan policies to further support Low Impact Development.		X			Community Development
The City should consider district stormwater treatment facilities in East Sumner.		X			Public Works
The City should consider other options for complying with the National Marine Fisheries Service 2008 Biological Opinion, including: restricting development in the 100-year floodplain; adopting the model ordinance; and submitting City regulations and a checklist to document compliance under existing regulations.		X			
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.		X			Public Works
Implement stream conveyance improvements for Salmon Creek, including the proposed realignment of a portion of Salmon Creek near its crossing under E Valley Highway E.		X Ongoing			Public Works

## CITY OF SUMNER – EAST SUMNER NEIGHBORHOOD PLANNED ACTION ORDINANCE

**Table C.1. Public Agency Mitigation Measures**

Mitigation Measures	Proposed Synchronous Amendments	Short Term: Within 5 years	Long Term	Other Agency	Responsible Department
<b>Plants and Animals:</b>					
Update the Comprehensive Plan Environmental Element and implement a Best Available Science Review of critical areas regulations	X Environmental Element Best Available Science Review of critical areas regulations				Community Development
Under the Preferred Alternative, a wetland mitigation bank would be established within public property south of 24 <sup>th</sup> 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.		X			Public Works
Restore 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 45 <sup>th</sup> St. Ct. E and 154 <sup>th</sup> Ave Ct. E. These improvements would involve the removal of invasive species (reed canary grass), planting of native riparian vegetation, and installation of habitat features (i.e. large woody debris and large boulders.)		X			Public Works
<b>Water Resources:</b>					
Enact the wetland mitigation bank proposed in the Comprehensive Plan update, which can be used for future development projects and will provide improved habitat value.		X			Community Development, Public Works
<b>Air Quality and Greenhouse Gases:</b>					
Enact Comprehensive Plan new Environmental Element policies regarding climate change and sustainability.	X Environmental Element Update				

## CITY OF SUMNER – EAST SUMNER NEIGHBORHOOD PLANNED ACTION ORDINANCE

Table C.1. Public Agency Mitigation Measures

Mitigation Measures	Proposed Synchronous Amendments	Short Term: Within 5 years	Long Term	Other Agency	Responsible Department
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: <ul style="list-style-type: none"> <li>• Provide end-of-trip bicycle facilities to employees.</li> <li>• Construct LEED-certified buildings.</li> <li>• Participate in the PSE Green Power Program.</li> </ul>		X			Community Development
The City could require the use of energy-efficient outdoor lighting for all new non-residential construction in all commercial and industrial zones and not just the M-1 zone.		X			Community Development
<b>Land Use:</b>					
<b>Population, Employment, and Housing:</b>					
Enact Comprehensive Plan updated housing and economic development policies.	X				Housing and Economic Development Elements
<b>Plans and Policies</b>					
The Comprehensive Plan Update includes 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.	X				
Policy amendments include referencing the Ecology Stormwater Manual and low impact development techniques.	X				

## CITY OF SUMNER – EAST SUMNER NEIGHBORHOOD PLANNED ACTION ORDINANCE

Table C.1. Public Agency Mitigation Measures

Mitigation Measures	Proposed Synchronous Amendments	Short Term: Within 5 years	Long Term	Other Agency	Responsible Department
The East Sumner Neighborhood Plan Update will guide development and public investments in the East Sumner Neighborhood	X				
The City could improve 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.		X			Public Works
<b>Public Facilities</b>					
Prepare an updated Capital Facilities Plan and Element	X				
The City could identify additional improvements for the 20-year planning period to address deficiencies projected in the long-term.		X			Public Works
The City could coordinate and cooperate with other jurisdictions in the implementation of multi-jurisdictional electric utility facility additions and improvements		X			Public Works
<b>Transportation</b>					
The Comprehensive Plan Update includes implementation of the updated 2015 Transportation Element.	X				Transportation Element
The Comprehensive Plan Update includes new and existing street improvements to enhance traffic flow, pedestrian mobility and facilitate infill development consistent with the Land Use Element and the East Sumner Neighborhood Plan.	X				
The Transportation Plan Update provides a comprehensive list of improvement projects and programs to meet the existing forecast transportation needs of the City.	X				

STAFF REPORT

DATE: June 19, 2015  
TO: Mayor Enslow and City Council  
FROM: Ryan Windish, Planning Manager  
RE: 2015 Comprehensive Plan Text Amendment  
SUBJECT: Staff Report—Part 2

## I. Description & Summary of Proposal

The applicant, Community Development Department for the City of Sumner, is proposing text amendments to the Comprehensive Plan. This staff report covers the following plan elements: **Parks and Open Space, Environment, Housing, and Utilities**. Each element has been reviewed by staff in light of changes to state law, best practices, community comments and insights. Numerous amendments are needed to bring the elements of the plan current and some are fairly minor or “housekeeping” in nature.

The following is a summary of the significant policy changes being propose for each element:

### Parks and Open Space Element

#### **Key Points:**

***Update to Parks and Open Space Plan:*** The plan needs to be updated every 5-years in order to be eligible for grants and state funding and there is policy that addresses the need for this update and provides amenities to consider such as dog parks. Proposed Policy 1.3.5 and 1.14 address the need for an update.

***Defining Open Space:*** Existing policy establishes a 35% open space requirement or the entire City and refers to the Parks and Open Space Plan for a definition. The proposed amendments to Policy 2.10 would clarify what is considered “open space.”

***Open Space for Employees:*** A new policy is proposed that recognizes the fact that there is a need for open space and other outdoor amenities within the industrial and commercial areas of the community for employees. Proposed new Policy 2.18 clarifies this need.

***Agriculture Protection:*** Consistent with other policy and map changes, policy related to the protection of agriculture clarifies that the protection would be for agricultural land in

rural areas and joint planning areas with Pierce County. See proposed amendments to Policy 2.3.3.

***New Parks and Open Space Map:*** Based on the proposed policy clarifying the definition of “open space” Figure 14 *Parks and Open Space Map* has been updated to show steep slope areas, floodways, etc.

### **Environment Element**

#### **Key Points:**

***Biodiversity:*** The City has been approached by the Pierce County Biodiversity Alliance with a request for including more detailed policy related to protecting biological diversity. Proposed amendment to Goal 3 is in response to this request. See comment letters in Exhibit A.

***Floodplain “Zero-rise” Policy:*** The City’s Flood Damage Prevention Ordinance currently allows for development to occur within the floodplain provided that there is no more than a 1 foot rise in the 100-year flood level. Other jurisdictions, including Pierce County, have adopted a “zero-rise” standard for development in the floodplain. Proposed Policy 2.2.3 addresses the need for the City to adopt this standard in the future to reduce likelihood of flooding and flood losses, provide consistency with other jurisdictions for development applicants, and to avoid conflict with other agencies.

### **Housing Element**

#### **Key Points:**

***Ground Related Housing Type:*** In 2005, the City Council adopted changes to the multi-family policies and regulations that require “ground related” configurations for new multi-family, stand-alone development unless it was part of a mixed-use structure. This essentially creates “townhouse” or “row house” style development. This requirement has the potential to reduce the potential for multi-family development in the Town Center area because maximum densities of 30-40 du/acre cannot be realized. Under the law, housing density not realized in the town center area may eventually need to be accommodated elsewhere in the City. Proposed amendments to Policy 1.6 would remove this policy requirement.

### **Utilities Element**

#### **Key Points:**

The Utilities Element is essentially about coordination and cooperation with utility providers such as PSE and telecommunications. The proposed policy changes are non-significant and house-keeping in nature.

## **II. Why the Amendment is being Proposed**

The reason why the City of Sumner is proposing the text amendments is described above.



### III. Comprehensive Plan Amendment Criteria

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

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

#### Parks and Open Space Element

The amendments would resolve inconsistencies between the Comprehensive Plan policies and the need to update the plan every 5-years to remain eligible for grants to do park improvements and resolve the inconsistency with the Parks and Open Space plan by defining “open space.” The amendments would also resolve inconsistency with Policy 1.3.3 which speaks to the need to plan for parks facilities for employees. Finally, the changes to the agricultural protection policy would resolve inconsistencies between the City’s plans and the Growth Management Act which emphasizes that preservation of agricultural resource lands should occur primarily in rural areas.

#### Environment Element

The amendments would resolve inconsistencies between the Comprehensive Plan policies and the Lower White River Biodiversity Plan prepared by the Pierce County Biodiversity Alliance and the “zero-rise” policy amendments are necessary to resolve inconsistencies between Sumner’s code and surrounding jurisdictions, including Pierce County.

#### Housing Element

The policy change recommended to remove the requirement for “ground-related” housing in the Town Center would resolve inconsistencies between the allowed zoning of 30-40 du/acre and what could actually be accomplished with ground-related development. While the stacked multi-family in a mixed use structure could obtain these densities, ground related would not with maximum densities on the order of 12-14 dwelling units per acre.

#### Utilities Element

The proposed policy changes would resolve inconsistencies with names of current providers and notification regarding annexations.

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

#### Parks and Open Space Element

Conditions have changed in that the *Parks and Open Space Plan* has not been updated in the last 5 years; development has occurred and other factors make it impractical to protect agricultural lands within the City; and there is a need to define “open space” more specifically to be sure the City meets this goal.

### Environment Element

Conditions have changed over the last 20 years such that the frequency and severity of flooding and the costs associated with flood damage and loss has necessitated a more conservative approach to flood protection, thus the proposed “zero-rise” policy. Science is also pointing to the need to maintain biodiversity in order to have a properly functioning ecosystem and protect sensitive and potentially threatened species.

### Housing Element

The housing market is recovering from the severe downturn and conditions are such that the Town Center should be seeing increased demand for development. These policy changes would promote development in the Town Center consistent with goals and policies related to attracting 300-500 dwelling units to this area.

### Utilities Element

Puget Sound Energy is often inquiring about potential annexations, the proposed policy would clarify that the City will be notifying them and coordinating planning efforts.

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

### Parks and Open Space Element

The proposal is consistent with the Plan Monitoring and Amendment Sub-element, Goal 1 and Policy 1.3 that discuss the need to: “Review and revise the Comprehensive Plan on a 10 year cycle...” which includes the need to review development regulations and other plans for consistency and any clarifications. Also, changes to open space policies for employees is consistent with Policy 1.3.3 in the Parks and Open Space Element that speaks to the need to plan for parks for employees. Finally, the policy changes are consistent with the overarching policy 2.3 in the Parks and Open Space Element related to the protection of “long term commercially viable” agriculture and Policy 1.3 in the Environment Element, just that the focus for agricultural preservation is in rural areas rather than urban.

### Environment Element

The proposal for additional biodiversity is consistent with the Goal 1 and Goal 2 of the Environment Element in that, Goal 1 advocates “protecting, enhancing, and promoting the natural environment” and Goal 2 more specifically focuses on “critical plant and wildlife habitat.” The amendment is consistent with these goals and further clarifies that maintaining and promoting biodiversity is important to the ecosystem. Finally, “zero-rise” flood policy is consistent with Policy 2.2 which discusses the need to “Minimize the potential for loss of life and damage...from flooding...” which this policy, if implemented would do in a greater way then the current regulations.

### Housing Element

The proposal is consistent with Goal 2 and Goal 4 of the Housing Element and Policy 2.3 in that it adds to the “range of housing types” and “housing available for all

economic segments of the community” within the Town Center area and furthers Policy 4.3 to “promote increased housing on strategic properties in the town center.”

#### Utilities Element

The proposal is consistent with Goal 2 of the Utilities Element in that the amendments would underscore the need to: “Plan and allow for regional and local improvements to electric facilities and *coordinate* service plans for facility development.” [emphasis added]

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

The proposed amendments are consistent with the GMA, CPPs, and VISION 2040. Refer to the analysis in Section 3.9 of the *Draft Supplemental Environmental Impact Statement (DSEIS) prepared for the 2015 Comprehensive Plan Update*.

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

There is no proposed map amendment addressed by this staff report.

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

The environmental impacts have been disclosed and analyzed in the *Draft Supplemental Environmental Impact Statement (DSEIS) prepared for the 2015 Comprehensive Plan Update*.

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

The potential ramification or additional amendments have been anticipated and discussed above. One clear ramification in the change to the open space definition was the updated Parks and Open Space Map (Figure 14). Other changes include removal of the Agricultural Zone from the Zoning Map and Zoning Code, and removal of Sumner Municipal Code Chapter 16.42 Agricultural Resource Lands.

## IV. Public & Agency Comment

### A. Public Comment

Letter from Linda Burgess, dated November 6, 2014 are in Exhibit A of Staff Report 1.

### B. Agency Comment

No public agency comments have been received at this time.

## V. Staff Recommendation

Staff recommends APPROVAL.

## VI. Planning Commission Recommendation

Planning Commission recommends APPROVAL with the following additional amendments:

### A. Environment Element—Greenhouse Gas Emissions Analysis

In response to comments from the Tacoma-Pierce County Health Department (TPCHD) related to greenhouse gas emissions and analysis, the Planning Commission is recommending that the Council adopt the following changes because the City already does a greenhouse gas emissions analysis when reviewing major updates to the Comprehensive Plan.

**Recommendation:** Adopt a new sub-policy 1.1.6 to the Environmental Element of the draft Comprehensive Plan to read as follows:

“1.1.6 Conduct a greenhouse gas emission analysis on alternatives for major updates to the comprehensive plan.”

### B. Environment Element—Vegetated Barriers On Major Roads

In response to TPCHD comments the Planning Commission is recommending that policy be added related to trees and vegetated barriers being needed between busy roadways and schools, residential areas and other places where high concentrations of air pollution could be more harmful. The City code already requires landscaping and screening from major roads so this is not a new requirement.

**Recommendation:** Adopt a new sub-policy 1.1.7 to the Environment Element of the draft Comprehensive Plan to read as follows:

“1.1.7 Require trees and other vegetated barriers between busy roadways and schools, residential areas and other places with a high concentration of vulnerable children and adults.”

### C. Environment Element—Biodiversity

In response to comments from the Pierce County Biodiversity Alliance (PCBA), the Planning Commission is recommending that a new policy be added showing the City’s intent to work with the PCBA and other stakeholders in completing the Sumner Chapter of the *Lower White River BMA Stewardship Plan*. Staff has already recommended inclusion of other policy related to biodiversity and believes that the stewardship plan needs to be completed prior to making any other policy changes.

**Recommendation:** Adopt a new policy 3.12 to the Environmental Element of the draft Comprehensive Plan to read as follows:

“3.12 The City will collaborate with partners and volunteers citizen groups that make up the Pierce County Biodiversity Alliance to assist in completing the Sumner Chapter of the *Lower White River BMA Stewardship Plan*.”

### D. Housing Element—Housing Strategy

In response to comments from the Puget Sound Regional Council (PSRC), the Planning Commission is recommending adding more specific language to Policy 2.1 of the Housing Element. The proposed language would include inventory of affordable housing, and a completion date among other details.

**Recommendation:** Adopt amendments to Policy 2.1 of the Housing Element in the draft Comprehensive Plan to read as follows:

“2.1.1 Develop a housing strategy to implement fair share objectives. It shall include an inventory of affordable housing, an analysis of Sumner’s fair share as compared to surrounding cities, and a phased approach to meet the community’s fair share housing allocation. Milestone dates and interim objectives shall be established to allow for progress in meeting the overall fair share targets. The housing strategy should be completed by December 2017.”

## VII. Map Amendments

No Map Amendments proposed.

## VIII. Exhibit

No Exhibits.

## IX. Text Amendments

See *Volume I: 2015 Comprehensive Plan Update* and the *Draft Comprehensive Plan*.

## X. Zoning Text Amendments

See *Volume I: 2015 Comprehensive Plan Update* and the *Draft Development Regulations Amendments*.





STAFF REPORT

DATE: June 19, 2015  
TO: Mayor Enslow and City Council  
FROM: Ryan Windish, Planning Manager  
RE: 2015 Comprehensive Plan Amendment  
SUBJECT: Staff Report—Part 3

I. **Description & Summary of Proposal**

The applicant, Community Development Department for the City of Sumner, is proposing text amendments to the Comprehensive Plan. This staff report covers the following plan elements: **Transportation, Capital Facilities and Public Services, Family and Human Services, and Shoreline Master Program**. Each element has been reviewed by staff in light of changes to state law, best practices, community comments and insights. Numerous amendments are needed to bring the elements of the plan current and some are fairly minor or “housekeeping” in nature.

The following is a summary of the significant policy changes being propose for each element:

**Transportation Element**

**Key Points:**

***New Intersections with Level of Service (LOS) F:*** There are key intersections in town that would require extensive and disruptive modifications to bring up to LOS D and are proposed to remain at LOS F, or failing. Policy 3.1 contains additional details.

***Future Transit Service:*** Proposed policy provides the opportunity to work with Pierce Transit in the future to reestablish transit in the city when demand warrants and funding allows. See Policy 2.4.

***Low Impact Development Preferred:*** Low impact development should be preferred alternative for future transportation projects. See Policy 6.5.

## **Capital Facilities and Public Services Element**

### **Key Points:**

***Police Level of Service (LOS):*** The current LOS requires 2 police officers for every 1,000 people in the city. However, increased population doesn't always mean an increased need for officers and really depends on demographics of the population, number of calls for service and other factors. Proposed Policy 1.2 and sub-policies 1.2.1, 1.2.2, 1.2.3, and 1.2.4 were recommended by the Police Department.

***East Pierce Fire and Rescue:*** The City merged with East Pierce Fire and Rescue (EPFR) in 2009 and proposed Policy 1.3 and sub-policies refer to EPFR's level of service.

***Budgeting:*** Ideally, the capital facilities plan is utilized in developing long-term (5-10 year) budget decisions as new facilities and costs are considered during the budget process. The Capital Facilities Plan (CFP) should set priorities and keep the City Council looking long-term, and not allowing short-term decisions to preclude long-term options. For example, Councils are reluctant to raise taxes and utility rates, but if an adopted level of service is to be maintained, fees or taxes may need to increase or additional funding obtained. Proposed Policy 1.12.1 addresses the tie between the capital facilities policies and the city budget.

## **Family and Human Services Element**

### **Key Points:**

***Healthy Lifestyles:*** The Center for Disease Control (CDC) is battling an epidemic of obesity in America and there is a direct link between people's weight and their level of activity. There is also an abundance of food that is cheap, but provides little nutritional value. One of the strategies has been to look at how communities are planned and ensure that they are providing access to areas for safe walking and biking. Cities have also been looking at ways to encourage grocery stores to locate in downtown areas and avoid "food deserts" where there are few if any healthy food choices convenient to a neighborhood. New Goal 4 and associated policies would address some of these issues and promote healthy and active lifestyles.

## **Shoreline Master Program Element**

GMA requires the Comprehensive Plan and Shoreline Master Program (SMP) be consistent. Chapter 5 of the SMP contains goals, policies, and objectives which are proposed to be included as the Shoreline Master Program Element of the Comprehensive Plan. As the SMP was adopted and approved in December 2014, these goals, policies, and objectives, are not able to be amended. Goal 4 contains minor house-keeping amendments.

## **II. Why the Amendment is being Proposed**

Why the amendments are being proposed is discussed above.



### III. Comprehensive Plan Amendment Criteria

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

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

#### Transportation Element

The amendments would resolve inconsistencies between the Comprehensive Plan Community Character policies and Land Use Element policies related to key intersections in town. The West Valley Hwy/Sumner-Heights Drive/Valley Avenue intersection may operate at LOS F to avoid costly and impractical improvements to the railroad crossing. The Main Street/Valley Ave intersection also would operate at LOS F to avoid destroying the character of Main Street in this location.

#### Capital Facilities and Public Services

The amendment would resolve inconsistencies between the Comprehensive Plan policies and the Police Department and East Pierce Fire and Rescue levels of service. The changes update these levels of service which are ultimately incorporated into the City's Capital Facilities Plan. In addition, the amendments related to tying budget discussions and considerations to the capital facilities plan resolves consistencies with the Growth Management Act.

#### Family and Human Services Element

The amendment would resolve inconsistencies between the Comprehensive Plan policies and the growing movement to combat obesity in the United States through community design that promotes active lifestyles. It would also resolve inconsistencies with plans and programs sponsored by the Tacoma-Pierce County Health Department for improving community design to be more walkable and bike friendly. Fortunately, the comprehensive plan already encourages and sets a policy direction for creating a very walkable and accessible community.

#### Shoreline Master Program Element

The amendment would resolve inconsistencies between the Comprehensive Plan policies and the recently updated Shoreline Master Program Goal 4.

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

#### Transportation Element

Conditions have changed over time to warrant amendments in that there has been increased traffic to create an LOS F at key intersections and therefore a policy to exempt them from the LOS D standard is necessary. In addition, low impact development (LID) has become the industry standard and policy should be amended to reflect that. Other minor policy changes and "housekeeping" is needed to address projects that have been completed, changes in state law, etc.

### Capital Facilities and Public Services

Conditions have changed regarding how police departments measure levels of service and this has become more sophisticated than simply a ratio of officers per capita. The proposed policies better reflect the actual workload and calls for service experienced by the department and allow that to better govern and gauge future needs for capital investment. Regarding fire service, the City, in 2009, dissolved the City owned fire department and merged with East Pierce Fire and Rescue. This change alone necessitates updating policies related to fire service.

### Family and Human Services Element

Conditions have changed in the last 20 years with a higher and higher rate of obesity in the United States, especially among the less advantaged and youth. One of the contributors to this epidemic is the lack of safe walking environments to allow people to choose to have some of their daily trips be on foot or bike. Other factors include lack of grocery stores in neighborhoods and medical facilities in the community. Goal 4 proposes that the City “Support programs and services that promote a healthy and active lifestyle” and subsequent policies address these needs.

### Shoreline Master Program Element

The Shoreline Master Program was updated in December 2014 and therefore has changed and the minor amendments proposed in Goal 4 reflect these changes.

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

### Transportation Element

The proposed changes to the Transportation Element and policies are consistent with other goals and objectives in the Comprehensive Plan particularly the desire for the City to be a walkable and pedestrian oriented community with trails, transit, and multiple modes of transportation. The amendments, particularly adoption of LOS F for key intersections, is consistent with other elements of the Comprehensive Plan.

### Capital Facilities and Public Services

The proposal is consistent with the overall intent of goals related to capital facilities including Goal 1: “Provide effective, efficient and quality capital facilities and public services at the level necessary to support a growing community.” The proposed update to police and fire levels of service is consistent with this overall goal. In addition, it is consistent with Policy 1.12 that requires “regular monitoring of capital facilities and public service needs and make appropriate amendments...” The sub-policies under Policy 1.12 make it clear that the City is to be considering the capital facilities element in updating “population projections” (Policy 1.12.2) and to “Update the Capital Improvement Programs at least every two years,” (Policy 1.12.3) which corresponds to budget cycles.

### Family and Human Services Element

The proposal is consistent with Goal 1 of the Community Character Element which states: “Maintain and enrich Sumner’s quality of life encompassed in its friendly, small town atmosphere” and Policy 1.1 that: “Encourage[s] development which enhances the human, pedestrian scale, creating a sense of community and place.” These policies evoke ideals to make Sumner a healthy and physically active community. The proposal is consistent with policies in the Parks and Open Space Element that promote recreation such as Policy 5.5: “Promote adequate provision of ... open space and recreation uses through implementation of the Parks and Open Space plan.”

Shoreline Master Program Element

The proposal is consistent with the GMA requirement that the Shoreline Master Program and the Comprehensive Plan be consistent.

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

The proposed amendments are consistent with the GMA, CPPs, and VISION 2040. Refer to the analysis in Section 3.9 of the *Draft Supplemental Environmental Impact Statement (DSEIS) prepared for the 2015 Comprehensive Plan Update*.

See additional amendments at the end regarding amendments based on comments from Puget Sound Regional Council.

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

There is no proposed map amendment addressed by this staff report.

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

The environmental impacts have been disclosed and analyzed in the *Draft Supplemental Environmental Impact Statement (DSEIS) prepared for the 2015 Comprehensive Plan Update*.

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

There only potential ramifications related to the proposed amendments would be that the Capital Facilities Plan must contain the same or updated level of service standards for police and fire service. The Draft CFP does contain these updated levels of service.

The Transportation Element goals and policies are identical to those in the Transportation Plan.

#### IV. Public & Agency Comment

See separate memo prepared by BERK consulting dated June 1, 2015 responding to comments received from the public and agencies.

#### V. Staff Recommendation

Staff recommends APPROVAL.

#### VI. Planning Commission Recommendation

Planning Commission recommends APPROVAL with the following additional amendments:

##### A. Transportation Element—Energy Conservation

PSRC asked that the City include policy that was consistent with the VISION 2040 transportation policies MPP-En-20 through 25 dealing with energy conservation and greenhouse gas alternatives.

**Recommendation:** Adopt a new policy 6.7 and 6.8 to the Transportation Element of the draft Comprehensive Plan to read as follows:

“6.7 Transportation Energy Conservation: Reduce the rate of energy use per capita, both in building use and in transportation activities.

6.8 Transportation Greenhouse Gas Alternatives: Reduce greenhouse gases by expanding the use of conservation and alternative energy sources and by reducing vehicle miles traveled by increasing alternatives to driving alone.”

##### B. Transportation Element—Disaster Protection

PSRC requested that the City adopt policy related to protecting transportation systems from disasters consistent with VISION 2040.

**Recommendation:** Adopt a new Policy 6.6 of the Transportation Element of the draft Comprehensive Plan to read as follows:

“6.6 Protect the transportation system against disaster, develop prevention and recovery strategies, and plan for coordinated responses.”

#### VII. Map Amendments

No Map Amendments proposed.

#### VIII. Exhibits

None

## IX. Text Amendments

See *Volume I: 2015 Comprehensive Plan Update* and the *Draft Comprehensive Plan*.

## X. Zoning Text Amendments

See *Volume I: 2015 Comprehensive Plan Update* and the *Draft Development Regulations Amendments*.





DATE: July 1, 2015  
TO: Mayor Enslow and City Council  
FROM: Ryan Windish, Planning Manager  
RE: **2015 Comprehensive Plan Update—Overview and Summary**

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## **BACKGROUND**

The 2015 Comprehensive Plan Update is a required by the Growth Management Act and includes updates to the Comprehensive Plan, development regulations, critical areas regulations and numerous other supporting plans and documents.

This memo is a summary of the documents being updated and a summary of the process. The material summarized in this memo is available for the public on the City of Sumner website at: [www.ci.sumner.wa.us](http://www.ci.sumner.wa.us); on a CD; and in hardcopy at City Hall.

## **DOCUMENTS**

### **A. Draft Comprehensive Plan**

The Comprehensive Plan is largely a policy document (the Draft SEIS contains all the background information) and is a roadmap for the next 20 years of growth and development. The Comprehensive Plan contains a Vision Statement, community values, and chapters (or elements) addressing **Land Use, Transportation, Housing, Parks and Open Space, Economic Development, Environment, Community Character, Utilities, Capital Facilities, and Family and Human Services**.

The Goals and Policies and the Comprehensive Plan map, if carried out, should produce the description in the Vision Statement. These Goals and Policies are the bases for future implementation through projects, plans, programs, and development regulations. Each policy should be read with outcomes in mind.

The Comprehensive Plan has to be consistent with the Growth Management Act, Countywide Planning Policies and the regional plan, VISION 2040, so during the update any changes are compared to these other plans to ensure consistency.

### **Text Amendments—Summary**

The following is a summary of proposed amendments to the Comprehensive Plan Text:

#### **Vision and Values Statements**

- ***Sustainability and Health:*** Need for sustainable and environmentally responsible development and have sidewalks and trails.
- ***Downtown Parking:*** Parking is balanced between residents, businesses, and commuters.

- ***Growth to the South:*** Long-term, the City may have to grow to the south to accommodate future population.
- ***Economic Development:*** Promotion, partnerships and incentives for manufacturing jobs and recruiting business in the downtown.
- ***Biodiversity:*** Values statement includes importance of biodiversity and the economic and quality of life benefits of a healthy functioning natural environment.

#### Land Use Element

- ***Joint Planning:*** Looking long term, 20-50 years out, the logical expansion area for the City is to the south. This remains a policy objective.
- ***Annexation Policies:*** Amendments clarify that the City would rely on privately initiated requests for future annexations.
- ***Subarea Planning Required:*** Amendments require subarea planning prior to annexation.
- ***Sound Transit and SR410 Interchange:*** Sound Transit has committed to assist funding improvements of the SR410 Interchange at Traffic Avenue as part of the parking garage project. New policy acknowledges this agreement.
- ***Agricultural Zoning and Designations:*** Under state law, the City cannot designate agriculture resource lands unless it has a transfer or purchase of development rights program. The amendment modifies policies and removes the Agriculture land use description.
- ***Increase Housing Densities:*** Table 1 of the Land Use Element has housing densities that do not match the Zoning Code and need to be corrected.
- ***Neighborhood Plan Districts Map:*** The Comprehensive Plan contains a Neighborhoods and Districts Map that maps focal points and ¼ mi radiuses. Areas have been removed due to changes in zoning.
- ***Clustering Development:*** The critical areas regulations allow clustering, therefore this is no longer required to be on the Comprehensive Plan Map. New policy in the Environment Element, addresses clustering as an option.

#### Economic Development Element

- ***Overlap and Redundancy:*** Amend or remove policies that repeat topics that are covered in other more specific areas of policy and the Plan.
- ***Marketing, Recruiting and Partnering:*** Need for partnering with other entities such as the Sumner Downtown Association, Chamber of Commerce and property and business owners to recruit and retain business

#### Community Character Element

- ***Overlap and Redundancy:*** The element contains cross-references to other topics and elements such as transportation, environment, and parks and open space. These policies are proposed to be removed, relocated, or rewritten to eliminate redundancy.
- ***Multi-family in the Town Center:*** In the Town Center Plan area allow stand-alone multi-family structures to be multi-level and reduce off-street parking requirements and allow for leased housing, not just condominiums.



## Parks and Open Space Element

- **Update to Parks and Open Space Plan:** New policy requiring an update every 5-years in order to be eligible for grants and state funding.
- **Defining Open Space:** Clarifies definition of 35% open space requirement for the entire City and refers to the Parks and Open Space Plan for a definition.
- **Open Space for Employees:** A new policy is proposed that recognizes the fact that there is a need for open space and other outdoor amenities within the industrial and commercial areas of the community for employees.
- **Agriculture Protection:** Consistent with other policy and map changes, policy related to the protection of agriculture, clarifies that the protection would be for agricultural land in rural areas and joint planning areas.
- **New Parks and Open Space Map:** Based on the proposed policy clarifying the definition of “open space.” Figure 14, *Parks and Open Space Map* has been updated to show steep slope areas, floodways, etc.

## Environment Element

- **Biodiversity:** Includes more detail about protecting biological diversity and the economic importance of biodiversity.
- **Floodplain “Zero-rise” Policy:** Proposed policy addresses the need for the City to adopt a “zero-rise” standard in the future to reduce likelihood of flooding and flood losses, provide consistency with other jurisdictions and agencies.

## Housing Element

- **Ground Related Housing Type:** Removes “ground related” requirement for new multi-family, stand-alone development in the Town Center to allow for maximum densities of 30-40 du/acre.

## Utilities Element

- **Coordination:** Amendments address the need to coordinate on annexations and other long range planning.

## Capital Facilities Element

- **Police Level of Service (LOS):** Expanded LOS is recommended beyond the current LOS that requires 2 police officers for every 1,000 people in the city. New policy based on demographics of the population, number of calls for service and other factors.
- **East Pierce Fire and Rescue:** The City merged with East Pierce Fire and Rescue in 2009 and proposed policies refer to their level of service.
- **Budgeting:** Proposed Policy ties the LOS and other CFP policies to the city budget process.

## Family and Human Services Element

- **Healthy Lifestyles:** Need for strategies and policies to promote healthy, active lifestyles. New policy promotes safe walking and biking and grocery.

## Shoreline Master Program Element

- **Consistency:** Goals and policies from the Shoreline Master Program are adopted verbatim into the Comprehensive Plan per state law.

## Comprehensive Plan Map Amendments--Summary (Exhibit A)

### **1. MIC Boundary Amendment (PLN-2015-0002 and 0004)**

Would include approximately 284.41 total acres within the Manufacturing/Industrial Center (MIC) and MIC Core Overlay in the vicinity of Stewart Road and East Valley Hwy; and 30.21 acres along Fryar Avenue and remove the Planned Mixed Use Development (PMUD) Overlay Zone. (PLN-2015-0002 and 0004)

**Planning Commission Recommendation: Approve**

### **2. MDR to M-1 on East Valley Hwy. (PLN-2015-0003)**

Proposal would re-designate/rezone from MDR (Medium Density Residential) to M-1 (Light Industrial) 35.35 acres of property located on the east side of East Valley Highway approximately 800 feet south of its intersection with Stewart Road/ 8th Street East. The property is bordered on the north by the City of Auburn.

**Planning Commission Recommendation: Approve**

### **3. NC to M-1 at 1418 Wood Avenue (PLN-2015-0005)**

Would re-designate/rezone approximately .42 acres of property from NC (Neighborhood Commercial) to M-1 (Light Industrial).

**Planning Commission Recommendation: Approve**

### **4. PPUF to LDR-1 at 2005 Cottage Road E. (PLN-2015-0006)**

Would re-designate/rezone 16.05 acres of property from PPUF (Public-Private Utilities and Facilities) to LDR-1 (Low Density Residential-1).

**Planning Commission Recommendation: Approve**

### **5. Agriculture (AG) to Residential Protection (RP) (PLN-2015-0007)**

Would rezone approximately 102 acres of property from Agricultural (AG) to Residential Protection (RP.) (See Exhibit A)

**Planning Commission Recommendation: Deny**

## **B. Draft Transportation Plan**

Traffic is something that has increased in Sumner over the years, not unlike other surrounding communities, due to growth and development. Sumner is a cross-road between several state highways and is also home to a burgeoning employment and industrial center. The growth in residential to the south and east of town has also increased pressure and traffic that we all experience. Street and road improvements are one of the most direct and visible ways that government helps improve the quality of life in a community. When a road is widened or intersection improved there is an immediate benefit.

The transportation plan is based on a model of assumed growth in the community and surrounding areas. The model is calibrated and studied to determine what transportation

improvements will be needed to maintain an acceptable level of service (LOS). LOS usually reflects delay at intersections or delay on a given stretch of road--the higher the LOS the less waiting and smoother flow of traffic.

### **C. Draft Capital Facilities Plan**

This Capital Facilities Plan (CFP) is a supporting document to the Comprehensive Plan. The CFP identifies what public facilities and services are needed for the planned growth and how to finance them. It evaluates existing infrastructure and levels of service for government facilities, water facilities, sanitary sewer, storm water, parks, public streets, fire facilities and public school facilities. With a set of capital projects and financial plans to carry them out, a CFP provides a clear path forward for infrastructure expansion. The CFP also ensures that infrastructure improvements are provided at the same time as development (“concurrent”) as required by state law.

If you are most interested in what deficiencies there may be in the various public facilities and what the plan is to meet the level of service, jump to the Chapters 4 (Section 4.3) and Chapter 5.

### **D. Environmental Impact Statement**

The *Draft Supplemental Environmental Impact Statement (Draft SEIS)* contains a detailed analysis of three alternative approaches to amending the Comprehensive Plan. The document summarizes the alternatives and their various outcomes on population and employment as well as housing units. Each element of the environment including air, water, land, transportation, land use, etc. is reviewed for potential impacts base on the alternative’s outcomes. Mitigation measures are proposed and significant unavoidable adverse impacts are disclosed. The document also contains a fact sheet on the proposals, distribution list, and various appendices with more detailed analysis.

This is a background document that allows the decision makers to be fully informed on the environmental impacts associated with any one of the three alternatives presented for consideration.

### **E. Draft Development Regulations**

The Zoning Code and Zoning Map have to be amended to implement amendments to the Comprehensive Plan for consistency. There is also a need, as always, to do some code housekeeping and clean-up. The draft development regulations contain specific amendments that would:

- Define and allow a “wetland mitigation bank” throughout the various zones in the City.
- Creates new development standards for Medium and High Density Residential zones.
- Amends multi-family requirements in the Town Center Plan:
  - Provide the option for developers to construct leased multi-family units or condominiums in the Town Center plan area;
  - Allow for mixed use structures to have ground floor spaces designed to accommodate commercial uses, but be developed as residential until the market demand was for mixed use;
  - Provides the option to do mutli-level residential structures as well as ground related;

- Lower the minimum parking ratios for multi-family in SMC 18.42 to better align with less parking demand (especially as it relates to development near a transit center) Developers still have the option to construct more parking than the minimum; and
- Remove Industrial Uses from Planned Mixed Use Development (PMUD).
- Delete references to the Shoreline Permit process in the Permit Procedures chapter.
- Requires concurrency for transportation improvements per GMA.
- Reduces parking requirements in the Town Center Plan Area
- Adopts updated Zoning Map based on Comprehensive Plan Map amendments.

#### **F. Draft Critical Areas Ordinance**

GMA requires the City to review the Critical Areas Ordinance (CAO) based on “best available science” and to update the regulations to address any gaps between what the science says is needed to protect wildlife and habitat and what the code requires. The City of Sumner contracted with Grette and Associates to perform an analysis of the City’s CAO and how it measures up to BAS. The report provided by the consultant is labeled *Best Available Science (BAS) Review and Recommendation for Updating Critical Area Regulations* and can be found in Volume I of the Draft SEIS issued February 2015.

Key changes:

- The current flood regulations are split between two sections, a FEMA regulation section and a GMA regulation section. Proposal will consolidate the two into one.
- Change wetland buffer requirements to increase flexibility and in most cases reduce buffer widths on most common (Category III) wetlands.
- Allow buffer averaging on wetlands.
- Recommendation is to increase stream buffers, but not changing at this time because of ongoing negotiations with federal agencies. Code allows director to increase the buffer if warranted on a case-by-case basis.

#### **NEXT STEPS**

The Council will have public hearing on the East Sumner Neighborhood Plan components of the 2015 Update on July 13.

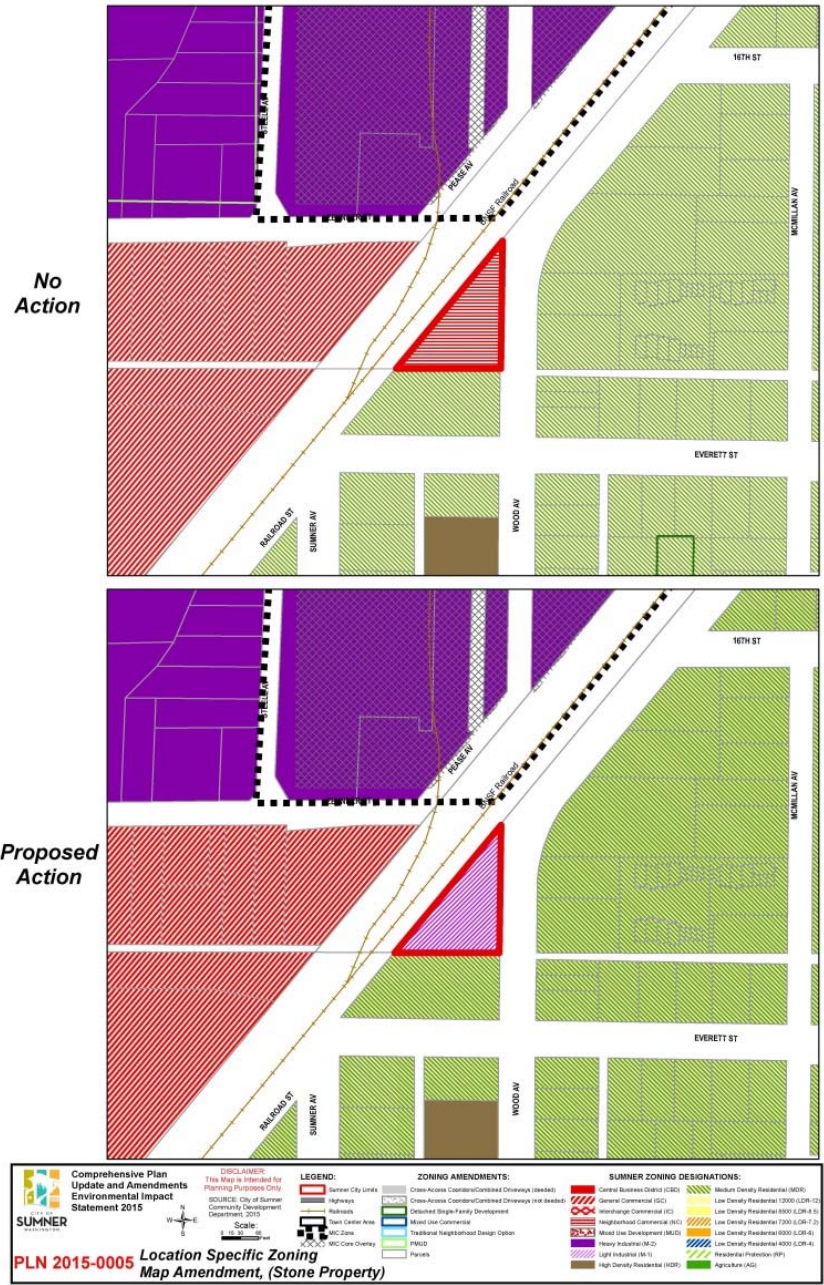
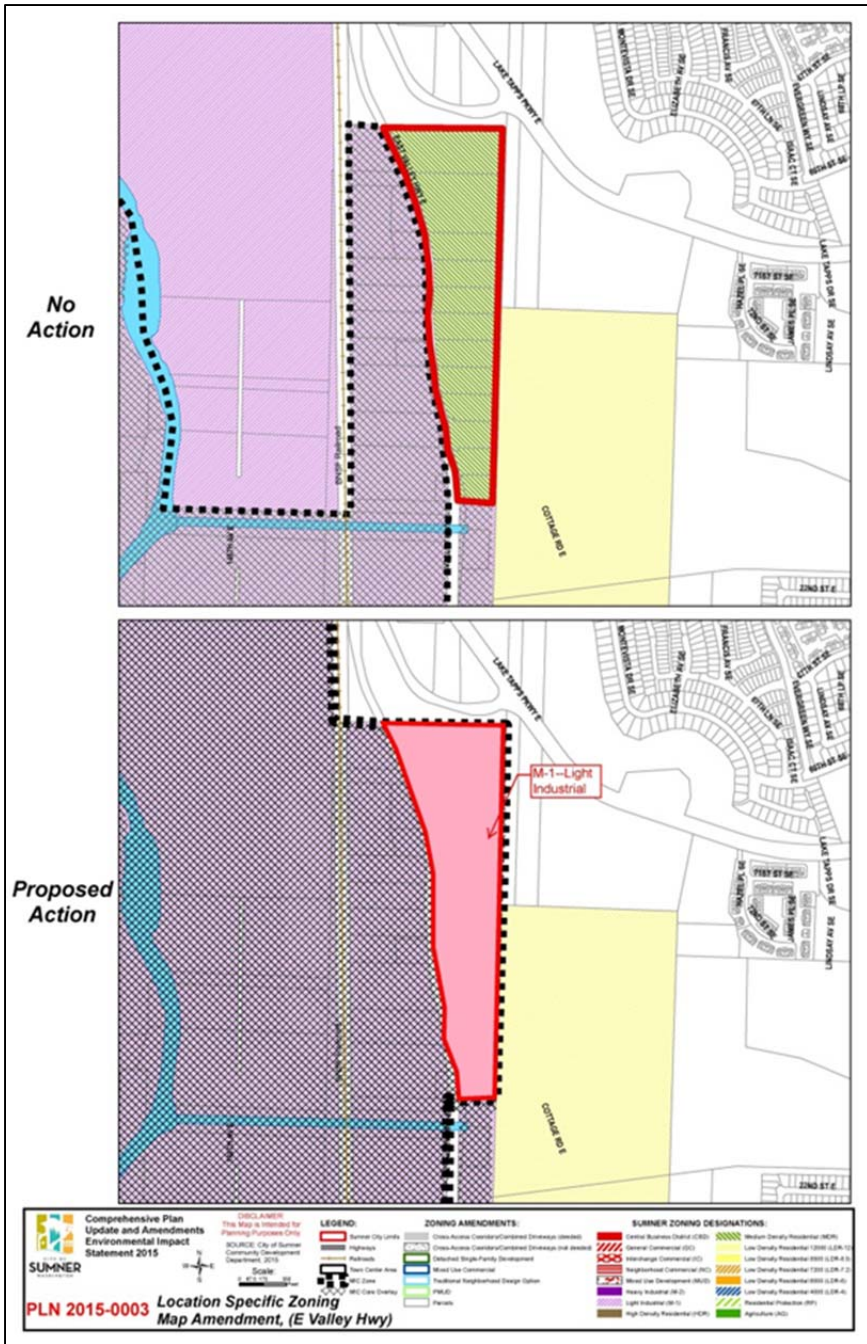
Various Council Workshops and Study Sessions will be scheduled as needed.

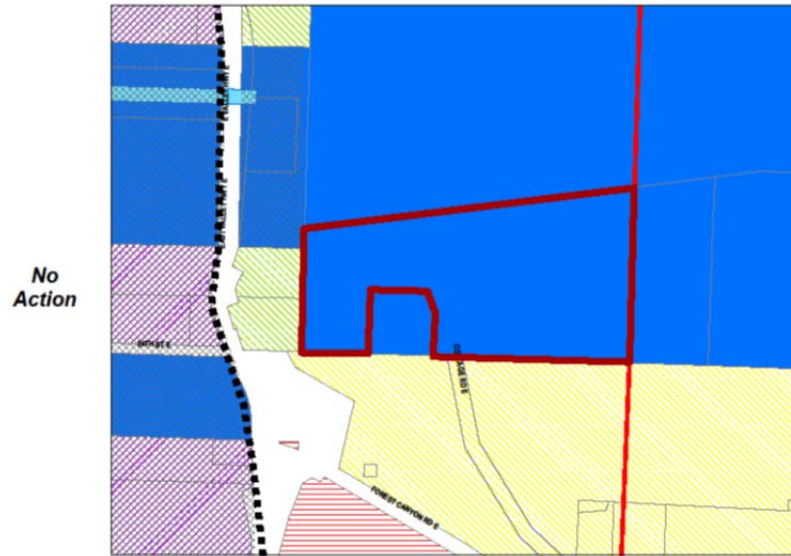
**July 6—Council Public Hearing #1**

**July 13—Council Special Meeting/Public Hearing #2**

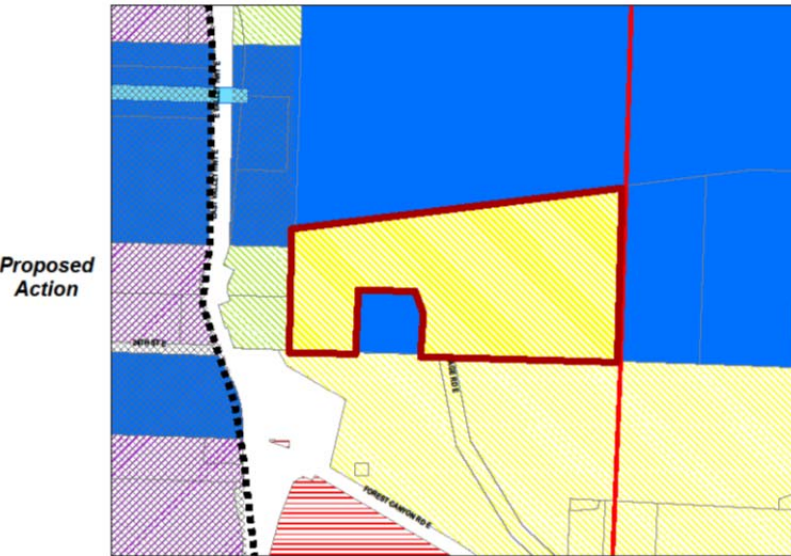
**July 27—Council Special Meeting/Action**







No Action



Proposed Action

**Comprehensive Plan Update and Amendments Environmental Impact Statement 2015**

**PLN 2015-0006 Location Specific Comprehensive Plan Map Amendment, (Cottage Rd)**

**DISCLAIMER:** This Map is intended for Planning Purpose Only. SOURCE: City of Sumner Community Development Department, 2015.

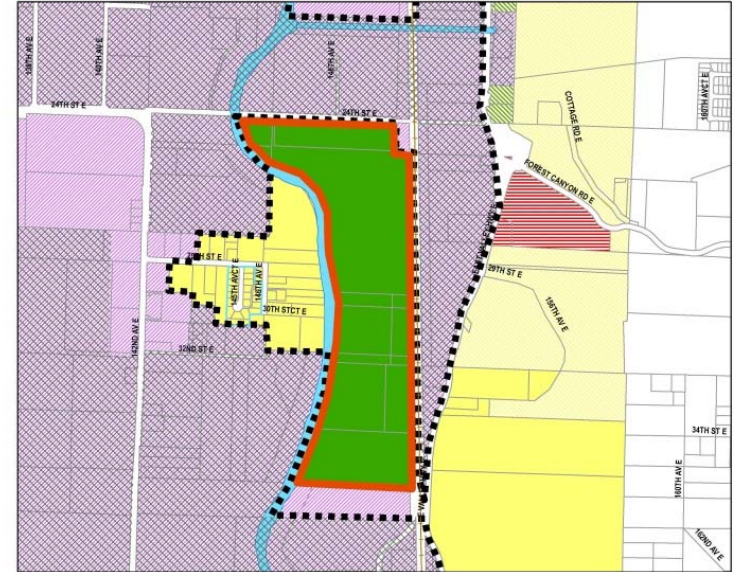
**LEGEND:**

- Sumner City Limits
- Neighborhood Boundary (Sumner Adopted)
- M/C Zone
- M/C Core Overlay
- East Sumner Neighborhood
- Tier Parcels

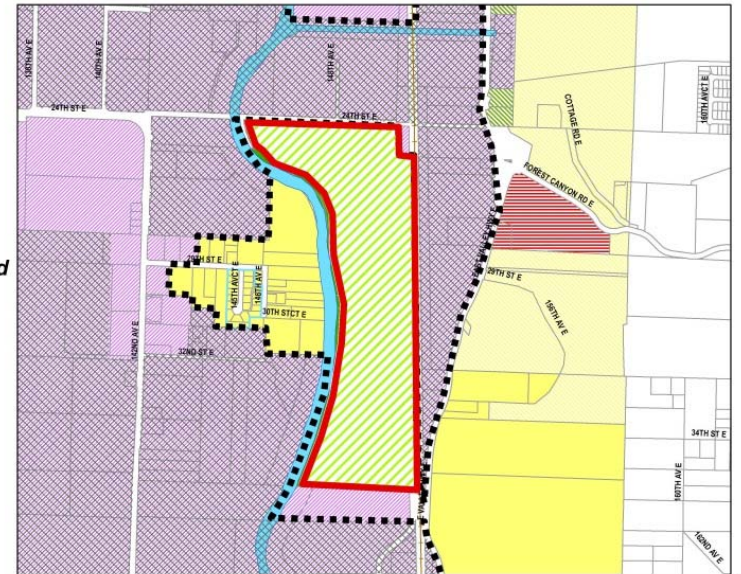
**COMPREHENSIVE PLAN DESIGNATIONS:**

- Central Business District
- General Commercial
- Interchange Commercial
- Neighborhood Commercial
- Mixed Use Development
- Heavy Industrial
- Light Industrial
- High Density Residential
- Medium Density Residential
- Low Density Residential 3
- Low Density Residential 2
- Low Density Residential 1
- Residential Protection
- Urban Village
- Public/Private
- Utilities & Facilities

**NOTE:** Additional Clustering Requirements apply to Designations Not Included with a "C" Based on Critical Area Regulations. \*Note: Refer to Cluster Overlay Provisions.



No Action



Proposed Action

**Comprehensive Plan Update and Amendments Environmental Impact Statement 2015**

**PLN 2015-0007 Location Specific Zoning Map Amendment, (South of 24th St E)**

**DISCLAIMER:** This Map is intended for Planning Purpose Only. SOURCE: City of Sumner Community Development Department, 2015.

**LEGEND:**

- Sumner City Limits
- Highways
- Interstates
- Neighborhood Boundary
- M/C Zone
- M/C Core Overlay
- Parcels

**ZONING AMENDMENTS:**

- Open Access Corridor/Combined Driveway (not adopted)
- Open Access Corridor/Combined Driveway (not adopted)
- Detached Single-Family Development
- Mixed Use Commercial
- Traditional Neighborhood Design Option
- PMUO
- Parcels

**SUMNER ZONING DESIGNATIONS:**

- Central Business District (CBD)
- Neighborhood Commercial (NC)
- Mixed Use Development (MUD)
- Heavy Industrial (HI-2)
- Light Industrial (LI-2)
- High Density Residential (HDR)
- Medium Density Residential (MDR)
- Low Density Residential 1000 (LDR-10)
- Low Density Residential 2000 (LDR-20)
- Low Density Residential 3000 (LDR-30)
- Low Density Residential 4000 (LDR-40)
- Low Density Residential 5000 (LDR-50)
- Residential Protection (RP)
- Agriculture (AG)





# Appendix D

Level of Service Summary Table



Weekday PM Peak Hour Assertive Action (Alt 3) LOS Summary

Intersections	2035 Without 24th Street Extension							2035 With 24th Street Extension						
	No Mitigation			With Mitigation			Mitigation Strategies	No Mitigation			With Mitigation			Mitigation Strategies
	LOS <sup>1</sup>	Delay <sup>1</sup>	WM <sup>1</sup>	LOS	Delay	WM		LOS	Delay	WM	LOS	Delay	WM	
1. W Valley Hwy E/Jovita Blvd / Stewart Road SE (8th St E)	F	>80	-	D	51	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	49	-	
2. SR-167 SB ramps/Stewart Rd SE (8th St E)	F	>80	-	D	42	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	35	-	R47: SR 167 Interchange at 8th Street E, from W Valley Highway to SR 167 northbound ramps. Widen to provide 4/5 lanes with turn lanes (WSDOT).
3. SR-167 NB ramps/Stewart Rd SE (8th St E)	F	>80	-	C	32	-	Same as Preferred Alternative (AA3-24)	E	72	-	C	31	-	
4. Valentine Ave SE/Stewart Rd SE (8th St E)	F	>80	-	D	46	-	Widen intersection to provide additional turn lanes or R5.3a: Reserve right-of-way to extend 24th St E as a 4/5-lane roadway across the Stuck River to East Valley Hwy. Provide signalized intersection at 24th Street E/E Valley Hwy.	D	53	-	-	-	-	
5. 140th Court E/Stewart Rd SE (8th St E)	B	11	-	-	-	-		A	9	-	-	-	-	
6. E Valley Highway/Terrace View Drive SE	B	19	-	-	-	-		C	21	-	-	-	-	
7. E Valley Highway/East Valley Access Rd	B	13	-	-	-	-		B	10	-	-	-	-	
8. E Valley Highway/Forest Canyon Road	D	35	WB	-	-	-		C	33	-	-	-	-	
9. 142nd Avenue E/24th Street E	D	44	-	-	-	-	No Mitigation Needed with this Alternative.	F	129	-	D	49	-	R5.3a: Reserve right-of-way to extend 24th St E as a 2/3-lane roadway across the Stuck River to East Valley Hwy. Provide signalized intersection at 24th Street E/E Valley Hwy. Provide improvements to the 24th St E/142nd Avenue E including potential NB right-turn lane and closing of the north leg driveway access.
10. 136th Avenue E/24th Street E	E	66	-	D	51	-	Same as Preferred Alternative (AA3-24) plus either a WB or SB right-turn lane.	E	63	-	D	44	-	R44: Coordinate traffic signal along 8th St E between West Valley Highway and Lake Tapps Parkway (see R50). (Coordinate with City of Pacific, WSDOT, & UPRR)
11. SR-167 NB Ramps/24th Street E	E	69	-	C	32	-	Same as Preferred Alternative (AA3-24)	E	60	-	C	23	-	
12. W Valley Highway/24th Street E	F	>80	-	D	35	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	36	-	R48: Provide additional turn lanes and coordinate intersections along 24th St E
13. W Valley Highway/SR 167 SB Ramps	F	>80	-	D	38	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	38	-	
14. West Valley Highway E/42nd St E	F	>50	WB	C	24	WB	Same as Preferred Alternative (AA3-24)	F	>50	WB	C	25	WB	R46: Widen to provide turn lanes and/or refuge/merge lanes as needed at key access points along the corridor.
15. W Valley Highway/Sumner-Heights Drive E	F	>80	-	-	-	-	Update Policy to LOS F standard.	F	>80	-	-	-	-	Update Policy to LOS F standard.
16. Valley Avenue E/Sumner-Heights Drive E	F	>80	-	-	-	-		F	>80	-	-	-	-	
17. Traffic Ave/Main Street (Bridge Street )	F	>80	-	-	-	-	Same as Preferred Alternative (AA3-24)	F	>80	-	-	-	-	Current Standard LOS F
18. Traffic Avenue/Maple Street	B	12	WB	-	-	-		B	12	WB	-	-	-	
19. Traffic Avenue/SR-410 WB Ramps (Thompson St)	F	>80	-	D	52	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	42	-	R14: Widen roadway and existing WSDOT overpass to 5 lanes. At the WB Ramps intersection, change existing SB right turn lane to a through-right lane and add additional NB left turn lane. At the EB Ramps intersection, add a SB right turn lane and SB through lane. Change existing SB through/right lane to a through lane. Add additional NB through lane. Revise signal timing to include protected left turn phase for NB left movement.
20. Traffic Avenue/SR-410 EB Ramps	E	73	-	D	43	-	Same as Preferred Alternative (AA3-24)	E	74	-	D	38	-	
21. Thompson St/Alder Avenue	D	29	NB	-	-	-		D	30	NB	-	-	-	
22. Alder Avenue/Main Street	F	>50	-	-	-	-	Current Standard LOS F	F	>50	-	-	-	-	Current Standard LOS F
23. Wood Avenue/Main Street	C	31	-	D	48	-	Same as Preferred Alternative (AA3-24)	C	31	-	D	52	-	R22: Upgrade signal and improve intersection operations by adding protected-permitted left-turn phasing on the eastbound-westbound directions to avoid queuing. Provide pedestrian signal upgrades to comply with ADA standards. Reconstruct intersection to minor arterial roadway standards.
24. Valley Avenue/Main Street	E	69	-	-	-	-	Same as Preferred Alternative (AA3-24)	E	64	-	-	-	-	Update Policy to LOS F standard.
25. Valley Avenue/Meade McCumber Rd E	B	18	-	-	-	-		B	19	-	-	-	-	
26. Valley Avenue/Gary Street	B	14	EB	-	-	-		B	14	EB	-	-	-	
27. Valley Avenue (SR-162)/SR-410 WB	E	64	-	C	30	-	Same as Preferred Alternative (AA3-24)	E	67	-	D	40	-	R17.2: Widening Traffic Ave to provide a 5 lane overpass. Reconfigure interchange to provide additional capacity and upgrade signals. (WSDOT)
28. Valley Avenue (SR-162)/SR-410 EB	F	>80	-	D	44	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	45	-	
29. SR-162/74th Street E	F	>50	WB	C	25	WB	Same as Preferred Alternative (AA3-24)	F	>50	WB	E	45	WB	R17.3 Widen to 4/5 lanes with geometric and intersection improvements along corridor. (WSDOT)
30. SR-162/Rivergrove Drive	C	26	-	A	8	-		C	30	-	A	8	-	
31. SR-162/Pioneer Way E	F	>80	-	D	39	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	47	-	R17.3 Widen to 4/5 lanes with geometric and intersection improvements along corridor. (WSDOT)
32. SR-162/96th Street E	D	38	-	C	29	-		D	41	-	C	30	-	
33. Fryar Avenue/Zehnder Avenue	F	>50	WB	C	31	-	Same as Preferred Alternative (AA3-24)	F	>50	WB	C	22	-	R21: Install new signal, when warranted
34. Tacoma Avenue/Puyallup Street	E	48	-	C	30	-	Same as Preferred Alternative (AA3-24)	E	37	-	B	14	-	R45: Install new signal, when warranted
35. Tacoma Ave/142nd Ave E	C	23	EBL	-	-	-		C	19	EBL	-	-	-	

Intersections	2035 Without 24th Street Extension							2035 With 24th Street Extension						
	No Mitigation			With Mitigation			Mitigation Strategies	No Mitigation			With Mitigation			Mitigation Strategies
	LOS <sup>1</sup>	Delay <sup>1</sup>	WM <sup>1</sup>	LOS	Delay	WM		LOS	Delay	WM	LOS	Delay	WM	
36. E Valley Highway/Puyallup Street	D	52	-	-	-	-		D	52	-	-	-	-	
37. E Valley Highway/Elm Street	F	>50	WBL	A	5	-	Same as Preferred Alternative (AA3-24)	F	>50	WBL	A	5	-	R49: Install traffic signals, when warranted. Realign Elm St/East Valley Hwy intersection to reduce sharp curve.
38. Valley Avenue/Elm Street	E	38	NBL	C	26	-	Same as Preferred Alternative (AA3-24)	E	43	NBL	C	26	-	
39. Parker Rd/Main Street	F	>50	SB/NB	A	7	-	Same as Preferred Alternative (AA3-24)	F	>50	SB/NB	A	8	-	R20: Installation traffic signal, when warranted to alleviate problems associated with increasing traffic. Underground conduit for signals installed as part of LID No. 60 in 1994. Intersection improvements should be in coordination with the East Main St Design Strategy Plan.
40. 160th Avenue E (Van Tassel Road)/60th Street E (Main Street)	F	>50	NB	A	5	-	Same as Preferred Alternative (AA3-24)	F	>50	NB	A	5	-	R19: Improve and square off intersection at Main Street and 160th and improve and widen streets to minor arterial standards with bike paths and sidewalks. Install traffic signal at Main St E/160th Ave E intersection, when warranted.
41. Sumner-Tapps Hwy (166th Ave E)/60th Street E (Main Street)	-	-	-	-	-	-	Same as Preferred Alternative (AA3-24)	-	-	-	-	-	-	R34: Close East Main St at Sumner-Tapps Hwy to improve safety. Improvement would be tied to construction of the 62nd St project (R11).
41 a. Sumner-Tapps Hwy (166th Ave E)/62nd Street E	F	>50	EB	C	35	-	Same as Preferred Alternative (AA3-24)	F	>50	EB	C	31	-	R11: Construct 62nd St E as a two-lane minor arterial with turn pockets to serve East Sumner in accordance with the approved neighborhood plan. Install signal at Sumner-Tapps Hwy/62nd St with associated turn lanes. Close Main St (60th St E) at Sumner-Tapps Hwy (see R34).
42. Sumner-Tapps Hwy (166th Ave E)/64th Street E	F	>80	-	C	30	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	43	-	R10.1: Widen roadway to 4/5 lanes and improve to minor urban arterial standards with curb, gutter, and sidewalks. Reconstruct intersection at 64th St E.
43. Sumner-Tapps Hwy (166th Ave E)/SR-410 WB	F	>50	WB	-	-	-	Same as Preferred Alternative (AA3-24)	F	>50	WB	-	-	-	R10.2: Reconfigure/reconstruct interchange including widen area to provide 4/5 lane cross-section with turn lanes. Reconfiguration could include consideration of realignment of WB ramps to use 64th St E, provision of a Single Point Urban Interchange (SPUI), etc. (WSDOT)
44. Sumner-Tapps Hwy (166th Ave E)/SR-410 EB	F	>80	-	D	37	-	Same as Preferred Alternative (AA3-24)	F	>80	-	C	34	-	
45. 160th Avenue E/64th Street	C	19	-	-	-	-		C	23	-	-	-	-	
46. Parker Rd E/Meade McCumber Rd E	B	13	SB	-	-	-		B	13	SB	-	-	-	

Notes:

1. Level of service (LOS), based on 2010 *Highway Capacity Manual* (HCM) methodology except in cases where the 2010 HCM methodology does not support analysis then the HCM 2000 method was used for evaluation.
2. Average delay in seconds per vehicle.
3. 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

Weekday PM Peak Hour No Action (Alt 1) LOS Summary

Intersections	2035 Without 24th Street Extension						2035 With 24th Street Extension							
	No Mitigation			With Mitigation			Mitigation Strategies	No Mitigation			With Mitigation			Mitigation Strategies
	LOS <sup>1</sup>	Delay <sup>1</sup>	WM <sup>1</sup>	LOS	Delay	WM		LOS	Delay	WM	LOS	Delay	WM	
1. W Valley Hwy E/Jovita Blvd / Stewart Road SE (8th St E)	F	>80	-	D	50	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	44	-	Same as Preferred Alternative (AA3-24)
2. SR-167 SB ramps/Stewart Rd SE (8th St E)	F	>80	-	D	39	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	35	-	Same as Preferred Alternative (AA3-24)
3. SR-167 NB ramps/Stewart Rd SE (8th St E)	F	>80	-	C	24	-	Same as Preferred Alternative (AA3-24)	D	50	-	-	-	-	No Mitigation Needed with this Alternative.
4. Valentine Ave SE/Stewart Rd SE (8th St E)	E	56	-	D	38	-	Widen intersection to provide additional turn lanes or R5.3a: Reserve right-of-way to extend 24th St E as a 4/5-lane roadway across the Stuck River to East Valley Hwy. Provide signalized intersection at 24th Street E/E Valley Hwy.	C	31	-	-	-	-	-
5. 140th Court E/Stewart Rd SE (8th St E)	B	10	-	-	-	-		A	9	-	-	-	-	
6. E Valley Highway/Terrace View Drive SE	B	16	-	-	-	-		B	17	-	-	-	-	
7. E Valley Highway/East Valley Access Rd	B	12	-	-	-	-		A	10	-	-	-	-	
8. E Valley Highway/Forest Canyon Road	C	24	WB	-	-	-		C	27	-	-	-	-	
9. 142nd Avenue E/24th Street E	C	24	-	-	-	-	No Mitigation Needed with this Alternative.	E	65	-	D	37	-	Provide a NB right-turn lane. North leg could remain open.
10. 136th Avenue E/24th Street E	C	29	-	-	-	-	No Mitigation Needed with this Alternative.	D	36	-	-	-	-	No Mitigation Needed with this Alternative.
11. SR-167 NB Ramps/24th Street E	D	44	-	-	-	-	No Mitigation Needed with this Alternative.	D	50	-	-	-	-	No Mitigation Needed with this Alternative.
12. W Valley Highway/24th Street E	D	54	-	-	-	-	No Mitigation Needed with this Alternative.	F	>80	-	C	29	-	Same as Preferred Alternative (AA3-24)
13. W Valley Highway/SR 167 SB Ramps	F	>80	-	C	22	-	Same as Preferred Alternative (AA3-24)	F	>80	-	C	24	-	Same as Preferred Alternative (AA3-24)
14. West Valley Highway E/42nd St E	D	27	WB	-	-	-	No Mitigation Needed with this Alternative.	D	27	WB	-	-	-	No Mitigation Needed with this Alternative.
15. W Valley Highway/Sumner-Heights Drive E	F	>80	-	C	32	-	Same as Preferred Alternative (AA3-24)	F	>80	-	C	30	-	Same as Preferred Alternative (AA3-24)
16. Valley Avenue E/Sumner-Heights Drive E	F	>80	-	C	26	-	Same as Preferred Alternative (AA3-24)	F	>80	-	C	24	-	Same as Preferred Alternative (AA3-24)
17. Traffic Ave/Main Street (Bridge Street )	F	>80	-	-	-	-	Current Standard LOS F	F	>80	-	-	-	-	Current Standard LOS F
18. Traffic Avenue/Maple Street	B	12	WB	-	-	-		B	12	WB	-	-	-	
19. Traffic Avenue/SR-410 WB Ramps (Thompson St)	F	>80	-	D	42	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	35	-	Same as Preferred Alternative (AA3-24)
20. Traffic Avenue/SR-410 EB Ramps	E	76	-	C	29	-	Same as Preferred Alternative (AA3-24)	E	76	-	D	36	-	Same as Preferred Alternative (AA3-24)
21. Thompson St/Alder Avenue	D	26	NB	-	-	-		C	24	NB	-	-	-	
22. Alder Avenue/Main Street	F	>50	-	-	-	-	Current Standard LOS F	F	>50	-	-	-	-	Current Standard LOS F
23. Wood Avenue/Main Street	D	37	-	D	53	-	Same as Preferred Alternative (AA3-24)	D	32	-	D	45	-	Same as Preferred Alternative (AA3-24)
24. Valley Avenue/Main Street	E	60	-	D	52	-	Same as Preferred Alternative (AA3-24)	E	55	-	D	48	-	Same as Preferred Alternative (AA3-24)
25. Valley Avenue/Meade McCumber Rd E	B	17	-	-	-	-		B	17	-	-	-	-	
26. Valley Avenue/Gary Street	B	12	EB	-	-	-		B	12	EB	-	-	-	
27. Valley Avenue (SR-162)/SR-410 WB	E	60	-	C	29	-	Same as Preferred Alternative (AA3-24)	E	57	-	D	35	-	Same as Preferred Alternative (AA3-24)
28. Valley Avenue (SR-162)/SR-410 EB	F	>80	-	D	42	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	41	-	Same as Preferred Alternative (AA3-24)
29. SR-162/74th Street E	F	>50	WB	E	37	WB	Same as Preferred Alternative (AA3-24)	F	>50	WB	E	42	-	Same as Preferred Alternative (AA3-24)
30. SR-162/Rivergrove Drive	C	25	-	A	8	-		C	26	-	A	8	-	
31. SR-162/Pioneer Way E	F	>80	-	D	49	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	49	-	Same as Preferred Alternative (AA3-24)
32. SR-162/96th Street E	D	39	-	C	29	-		D	39	-	C	29	-	
33. Fryar Avenue/Zehnder Avenue	F	>50	WB	C	20	-	Same as Preferred Alternative (AA3-24)	F	>50	WB	B	13	-	Same as Preferred Alternative (AA3-24)
34. Tacoma Avenue/Puyallup Street	D	35	-	-	-	-	No Mitigation Needed with this Alternative.	C	21	-	-	-	-	No Mitigation Needed with this Alternative.
35. Tacoma Ave/142nd Ave E	C	19	EBL	-	-	-		C	16	EBL	-	-	-	
36. E Valley Highway/Puyallup Street	D	40	-	-	-	-		C	31	-	-	-	-	
37. E Valley Highway/Elm Street	E	48	WBL	A	5	-	Same as Preferred Alternative (AA3-24)	E	42	WBL	A	5	-	Same as Preferred Alternative (AA3-24)
38. Valley Avenue/Elm Street	D	31	NBL	B	20	-	Same as Preferred Alternative (AA3-24)	D	33	NBL	B	17	-	Same as Preferred Alternative (AA3-24)
39. Parker Rd/Main Street	F	>50	SB/NB	A	8	-	Same as Preferred Alternative (AA3-24)	F	>50	SB/NB	A	7	-	Same as Preferred Alternative (AA3-24)
40. 160th Avenue E (Van Tassel Road)/60th Street E (Main Street)	F	>50	NB	A	7	-	Same as Preferred Alternative (AA3-24)	F	>50	NB	A	7	-	Same as Preferred Alternative (AA3-24)

Weekday PM Peak Hour No Action (Alt 1) LOS Summary

Intersections	2035 Without 24th Street Extension						2035 With 24th Street Extension							
	No Mitigation			With Mitigation			Mitigation Strategies	No Mitigation			With Mitigation			Mitigation Strategies
	LOS <sup>1</sup>	Delay <sup>1</sup>	WM <sup>1</sup>	LOS	Delay	WM		LOS	Delay	WM	LOS	Delay	WM	
41. Sumner-Tapps Hwy (166th Ave E)/60th Street E (Main Street)	C	22	EB	-	-	-	Same as Preferred Alternative (AA3-24); safety improvement would continue to be needed.	C	21	EB	-	-	-	Same as Preferred Alternative (AA3-24); safety improvement would continue to be needed.
41 a. Sumner-Tapps Hwy (166th Ave E)/62nd Street E	-	-	-	-	-	-		-	-	-	-	-	-	
42. Sumner-Tapps Hwy (166th Ave E)/64th Street E	F	>80	-	F	88	-	Same as Preferred Alternative (AA3-24); Additional improvements needed without provision of 62nd St E. <sup>5</sup>	F	>80	-	F	85	-	Same as Preferred Alternative (AA3-24); Additional improvements needed without provision of 62nd St E. <sup>5</sup>
43. Sumner-Tapps Hwy (166th Ave E)/SR-410 WB	F	>50	WB	-	-	-	Same as Preferred Alternative (AA3-24)	F	>50	WB	-	-	-	Same as Preferred Alternative (AA3-24)
44. Sumner-Tapps Hwy (166th Ave E)/SR-410 EB	F	>80	-	C	32	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	42	-	Same as Preferred Alternative (AA3-24)
45. 160th Avenue E/64th Street	E	41	-	-	-	-	Additional improvements needed without provision of 62nd St E. <sup>5</sup>	E	41	-	-	-	-	Additional improvements needed without provision of 62nd St E. <sup>5</sup>
46. Parker Rd E/Meade McCumber Rd E	B	13	SB	B	13	SB	Same as Preferred Alternative (AA3-24)	B	13	SB	B	13	SB	Same as Preferred Alternative (AA3-24)

Notes:

1. Level of service (LOS), based on 2010 *Highway Capacity Manual* (HCM) methodology except in cases where the 2010 HCM methodology does not support analysis then the HCM 2000 method was used for evaluation.
2. Average delay in seconds per vehicle.
3. 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
5. Provision of the 62nd Street E connection may not be possible with this Alternative due to the cost of this improvement.

Weekday PM Peak Hour Minimal Rezone (Alt 2) LOS Summary

Intersections	Without 24th Street Extension						With 24th Street Extension						
	No Mitigation		With Mitigation		Mitigation Strategies		No Mitigation		With Mitigation		Mitigation Strategies		
	LOS <sup>1</sup>	Delay <sup>1</sup>	WM <sup>1</sup>	LOS	Delay	WM	LOS	Delay	WM	LOS	Delay	WM	
1. W Valley Hwy E/Jovita Blvd / Stewart Road SE (8th St E)	F	>80	-	E	56	-	F	>80	-	D	46	-	Same as Preferred Alternative (AA3-24)
2. SR-167 SB ramps/Stewart Rd SE (8th St E)	F	>80	-	D	48	-	F	>80	-	D	39	-	Same as Preferred Alternative (AA3-24)
3. SR-167 NB ramps/Stewart Rd SE (8th St E)	F	>80	-	C	30	-	E	73	-	C	30	-	Same as Preferred Alternative (AA3-24)
4. Valentine Ave SE/Stewart Rd SE (8th St E)	F	>80	-	D	46	-	D	54	-	-	-	-	Widen intersection to provide additional turn lanes or R5.3a: Reserve right-of-way to extend 24th St E as a 4/5-lane roadway across the Stuck River to East Valley Hwy. Provide signalized intersection at 24th Street E/E Valley Hwy.
5. 140th Court E/Stewart Rd SE (8th St E)	B	11	-	-	-	-	A	9	-	-	-	-	
6. E Valley Highway/Terrace View Drive SE	B	18	-	-	-	-	C	21	-	-	-	-	
7. E Valley Highway/East Valley Access Rd	B	13	-	-	-	-	B	10	-	-	-	-	
8. E Valley Highway/Forest Canyon Road	E	36	WB	D	31	WB	C	31	-	-	-	-	Provide a NB right-turn lane
9. 142nd Avenue E/24th Street E	D	48	-	-	-	-	F	136	-	D	52	-	No Mitigation Needed with this Alternative.
10. 136th Avenue E/24th Street E	E	64	-	D	51	-	E	64	-	D	39	-	Same as Preferred Alternative (AA3-24)
11. SR-167 NB Ramps/24th Street E	D	46	-	-	-	-	E	60	-	C	22	-	No Mitigation Needed with this Alternative.
12. W Valley Highway/24th Street E	F	>80	-	D	39	-	F	>80	-	D	40	-	Same as Preferred Alternative (AA3-24)
13. W Valley Highway/SR 167 SB Ramps	F	>80	-	D	38	-	F	>80	-	D	37	-	Same as Preferred Alternative (AA3-24)
14. West Valley Highway E/42nd St E	F	>50	WB	C	25	WB	F	>50	WB	C	24	WB	Same as Preferred Alternative (AA3-24)
15. W Valley Highway/Sumner-Heights Drive E	F	>80	-	D	47	-	F	>80	-	D	43	-	Same as Preferred Alternative (AA3-24)
16. Valley Avenue E/Sumner-Heights Drive E	F	>80	-	C	32	-	F	>80	-	C	31	-	Same as Preferred Alternative (AA3-24)
17. Traffic Ave/Main Street (Bridge Street )	F	>80	-	-	-	-	F	>80	-	-	-	-	LOS standard = F
18. Traffic Avenue/Maple Street	B	12	WB	-	-	-	B	12	WB	-	-	-	
19. Traffic Avenue/SR-410 WB Ramps (Thompson St)	F	>80	-	D	52	-	F	>80	-	D	42	-	Same as Preferred Alternative (AA3-24)
20. Traffic Avenue/SR-410 EB Ramps	E	76	-	D	36	-	E	77	-	D	46	-	Same as Preferred Alternative (AA3-24)
21. Thompson St/Alder Avenue	D	28	NB	-	-	-	D	28	NB	-	-	-	
22. Alder Avenue/Main Street	F	>50	-	-	-	-	F	>50	-	-	-	-	LOS standard = F
23. Wood Avenue/Main Street	C	33	-	D	49	-	C	32	-	D	50	-	Same as Preferred Alternative (AA3-24)
24. Valley Avenue/Main Street	E	64	-	D	49	-	E	61	-	D	51	-	Same as Preferred Alternative (AA3-24)
25. Valley Avenue/Meade McCumber Rd E	B	19	-	-	-	-	B	18	-	-	-	-	
26. Valley Avenue/Gary Street	B	13	WB	-	-	-	B	13	EB	-	-	-	
27. Valley Avenue (SR-162)/SR-410 WB	E	61	-	C	29	-	E	62	-	D	37	-	Same as Preferred Alternative (AA3-24)
28. Valley Avenue (SR-162)/SR-410 EB	F	>80	-	D	35	-	F	>80	-	D	49	-	Same as Preferred Alternative (AA3-24)
29. SR-162/74th Street E	F	>50	WB	E	42	WB	F	>50	WB	E	45	WB	Same as Preferred Alternative (AA3-24)
30. SR-162/Rivergrove Drive	C	29	-	A	8	-	C	29	-	A	8	-	
31. SR-162/Pioneer Way E	F	>80	-	D	48	-	F	>80	-	D	48	-	Same as Preferred Alternative (AA3-24)
32. SR-162/96th Street E	D	41	-	C	30	-	D	41	-	C	30	-	
33. Fryar Avenue/Zehnder Avenue	F	>50	WB	C	34	-	F	>50	WB	C	21	-	Same as Preferred Alternative (AA3-24)
34. Tacoma Avenue/Puyallup Street	F	>50	-	D	38	-	E	38	-	B	14	-	Same as Preferred Alternative (AA3-24)
35. Tacoma Ave/142nd Ave E	C	24	EBL	-	-	-	C	19	EBL	-	-	-	
36. E Valley Highway/Puyallup Street	D	50	-	-	-	-	D	50	-	-	-	-	
37. E Valley Highway/Elm Street	F	>50	WBL	A	5	-	F	>50	WBL	A	5	-	Same as Preferred Alternative (AA3-24)
38. Valley Avenue/Elm Street	E	38	NBL	C	25	-	E	43	NBL	C	25	-	Same as Preferred Alternative (AA3-24)
39. Parker Rd/Main Street	F	>50	SB/NB	A	8	-	F	>50	SB/NB	A	7	-	Same as Preferred Alternative (AA3-24)
40. 160th Avenue E (Van Tassel Road)/60th Street E (Main Street)	F	>50	NB / SB	A	7	-	F	>50	NB	A	7	-	Same as Preferred Alternative (AA3-24)

Weekday PM Peak Hour Minimal Rezone (Alt 2) LOS Summary

Intersections	Without 24th Street Extension							With 24th Street Extension						
	No Mitigation			With Mitigation			Mitigation Strategies	No Mitigation			With Mitigation			Mitigation Strategies
	LOS <sup>1</sup>	Delay <sup>1</sup>	WM <sup>1</sup>	LOS	Delay	WM		LOS	Delay	WM	LOS	Delay	WM	
41. Sumner-Tapps Hwy (166th Ave E)/60th Street E (Main Street)	C	24	EB	-	-	-	Same as Preferred Alternative (AA3-24); safety improvement would continue to be needed.	C	23	EB	-	-	-	Same as Preferred Alternative (AA3-24); safety improvement would continue to be needed.
41 a. Sumner-Tapps Hwy (166th Ave E)/62nd Street E	-	-	-	-	-	-		-	-	-	-	-	-	
42. Sumner-Tapps Hwy (166th Ave E)/64th Street E	F	>80	-	F	138	-	Same as Preferred Alternative (AA3-24); Additional improvements needed without provision of 62nd St E. <sup>5</sup>	F	>80	-	F	104	-	Same as Preferred Alternative (AA3-24); Additional improvements needed without provision of 62nd St E. <sup>5</sup>
43. Sumner-Tapps Hwy (166th Ave E)/SR-410 WB	F	>50	WB	-	-	-	Same as Preferred Alternative (AA3-24)	F	>50	WB	-	-	-	Same as Preferred Alternative (AA3-24)
44. Sumner-Tapps Hwy (166th Ave E)/SR-410 EB	F	>80	-	D	39	-	Same as Preferred Alternative (AA3-24)	F	>80	-	D	43	-	Same as Preferred Alternative (AA3-24)
45. 160th Avenue E/64th Street	E	41	-	E	41	-	Additional improvements needed without provision of 62nd St E. <sup>5</sup>	E	41	-	E	41	-	Additional improvements needed without provision of 62nd St E. <sup>5</sup>
46. Parker Rd E/Meade McCumber Rd E	B	13	SB	B	13	SB	Same as Preferred Alternative (AA3-24)	B	13	SB	B	13	SB	Same as Preferred Alternative (AA3-24)

Notes:

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