

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:	July 2, 2024		
Applicant:	Name/Company: Jason Hubbell / Barghausen Consulting Engineers, Inc.	Phone #: (425) 251-6222	Cell #:
	Mailing Address: 18215 72nd Ave. S. Kent, WA 98302	Email Address: jhubbell@barghausen.com	
Property Owner:	Name/Company: Graham Satterwhite / 160TH APARTMENTS LLC	Phone #: (206) 233-9600	Cell #:
	Mailing Address: 1302 Puyallup Street, Suite A Sumner, WA 98390	Email Address: gsatterwhite@tarragon.com	
Property Address	Street: 6108, 6204, 6216 and 6218 160th Avenue East	City, State, Zip Code: Sumner, WA 98390	
Parcel Information	Assessor Parcel Number: 052019-4010, -4057, -4081, -4082, -8001 and -8002	Property Size in Acres: 7.24 acres	
Give a brief, complete description of your proposal.	This proposal includes grade and fill operations, preloading, construction of utility systems, parking lot construction and construction of eight new 3 story apartment buildings, one clubhouse and one maintenance building. Road improvements, including parking and pedestrian improvements, are proposed along the 160th Avenue East frontage. A mid-block pedestrian and bike corridor is also proposed.		
Property Zoning	District Name: East Sumner Neighborhood Overlay Neighborhood Commercial and Medium Density Residential	Building Type: Multifamily	
Permits Requested (list all that apply)	Land Use: Design Review	Engineering: Site Development, ROW Use	
	Building: Multifamily	Other: Department of Ecology NPDES Permit	
	All Applications Deemed Complete? Yes ___ No X Explain: Not all applications have been submitted.		

	Are there pending governmental approvals of other proposals directly affecting the property covered by your proposal? Yes __ No <u>X</u> Explain:		
Existing Land Use	Describe Existing Uses on the Site: The site currently is undeveloped. The site was cleared 2021-2022.		
Proposed Land Use – Check and Circle All That Apply	Single Family or Multi-family dwelling units Commercial Retail	Open Space, Parks, Plazas , Trails, Gathering Spaces Other: _____ Other: _____	
Dwellings	# Existing Dwelling Units: # ___ Dwelling Type # ___ Dwelling Type _____	# Proposed Dwelling Units: # 208 Type Multi-Family # ___ Type _____	Proposed Density (du/ac): 29
	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: 0 New Employment (Jobs): 413 Type of Employment: Leasing Office Retail Square Feet: 0 SF Commercial Office: <u>400</u> SF <u>6</u> Jobs Other (describe): _____ SF _____ Jobs		Proposed Square Feet: 2,500 Jobs Remainder as of _____20____ _____jobs
	Existing Stories: Existing Height in feet:		Proposed Stories: 3 Proposed Height in feet: Less than 50 feet
Parking Spaces	Existing:		Proposed: 352
PM Peak Hour Weekday Vehicle Trips	Existing Estimated Trips Total:	Future Estimated Trips Total: 1409 total , 110 peak PM trips	Net New Trips: 1409
	Maximum net new primary PM peak hour trips in Ordinance: 1,590		Trip Bank Remainder as of _____20____ _____dwellings
	Source of Trip Rate: ITE Manual <u>X</u> Other _____		Transportation Impacts Determined Consistent with Ordinance Subsection 4.D(3): Yes _____ No _____
Proposed timing or schedule (including phasing).	Construct Utility Systems - Spring-Summer 2025 Construct Apartment Buildings, Parking Lot and Landscaping – Fall 2025-Fall 2026		

Describe plans for future additions, expansion, or further activity related to this proposal.	No future additions or expansions are proposed.
List any available or pending environmental information directly related to this proposal.	Geotechnical Engineering Study prepared by Earth Solutions NW dated August 28, 2019 and seismic memo dated July 25, 2023 Critical Area Report prepared by Sewell Wetland Consulting, Inc. dated August 7, 2019 Groundwater Monitoring prepared by Earth Solutions NW dated May 3, 2024

B. ENVIRONMENTAL CHECKLIST AND MITIGATION MEASURES

Earth Checklist and Mitigation Measures	
<p>Description of Conditions General description of the site (circle one): <u>Flat</u>, rolling, hilly, steep slopes, mountainous, other _____ What is the steepest slope on the site (approximate percent slope)? 40% in existing drainage ditches What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? Site soils are generally loam: Briscot loam (6A), Sultan silt loam (42A) and Puyallup fine sandy loam (31A).</p>	<p>STAFF COMMENTS:</p>
<p>Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. The site will be regraded for the new development. Approximately 6,000 cubic yards of on-site cut and fill is proposed and approximately 5000-6000 cubic yards of imported rock will be used to grade the site for the proposed development. The site has already been partially graded based on the grade and fill plans prepared for the site.</p>	
<p>Has any part of the site been classified as a "geologically hazardous" area? (Check all that apply) Landslide Hazards Erosion Hazards Seismic Hazards Liquefaction Hazards - X Volcanic Hazards - X Other: _____ Describe:</p>	
<p>Are there surface indications or history of problem soils in the immediate vicinity? If so, describe. No.</p>	

Proposed Measures to control impacts to earth, soils, and geologic hazardous areas:
 THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):
 Compliance with City Erosion Control Ordinance (SMC 16.05). **X**
 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) **X**
 Pre-loading, foundation and footing system design considerations, parking area asphalt design, and compliance with the International Building Code standards (SMC 15.08.010). **X**
 Other: _____

Flooding Checklist and Mitigation Measures

1. Description of Conditions
 A. Is the project site within a designated floodplain? If so, describe the type and extent of the designated floodplain:
No. According to FEMA FIRM Floodplain Map No. 530530 0354 E, the proposal lies in Zone X, which is an area of minimal flood hazard.

2. Is development proposed within the designated floodplain? If so, explain in more detail:
No.

Are there indications of past flooding on the property?
No.

STAFF COMMENTS:

Proposed Measures to control impacts to flooding:
 THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):
 Compliance with the National Flood Insurance Program (NFIP) Standards.
 Compliance with Washington State Department of Ecology Low Impact Development Manual Compliance
 Compliance with the Shoreline Master Program and Critical Areas Regulations.
 District Stormwater Facilities Constructed. **X An infiltration facility is proposed on site.**
 Implementation of stream conveyance improvements for Salmon Creek. This includes the proposed realignment of a portion of Salmon Creek near its crossing under E Valley Highway E.

Plants and Animals Checklist and Mitigation Measures	
Plants and Habitat Checklist	STAFF COMMENTS:
Check or circle types of vegetation found on the site: Deciduous tree: Alder, maple, aspen, other _____ Evergreen tree: Fir, cedar, pine, other _____ Shrubs _____ Grass _____ Pasture _____ Crop or grain _____ Orchards, vineyards or other permanent crops _____ Wet soil plants: Cattail, buttercup, bullrush, skunk cabbage, other _____ Water plants: Water lily, eelgrass, milfoil, other _____ Other types of vegetation: All vegetation has been removed from the site. _____	
Are there wetlands on the property? Please describe their acreage and classification. No.	
Is there riparian habitat on the property? No.	
List all noxious weeds and invasive species known to be on or near the site. Himalayan blackberry	
What kind and amount of vegetation will be removed or altered? All vegetation has been removed from the site..	
List threatened and endangered species known to be on or near the site. The applicant is not aware of any threatened or endangered plant species on the subject site.	
Is the proposal consistent with critical area regulations? Please describe. No critical area regulations apply to the site.	

<p>Proposed landscaping, use of native plants, buffers, or other measures to preserve or enhance vegetation on the site: 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. X Restoration of select locations along Salmon Creek. Other: _____ Describe: Upon development of the future buildings, the street fronts and project site will be landscaped with trees, shrubs, and lawns.</p>	<p>STAFF COMMENTS:</p>
<p>Fish and Wildlife</p>	
<p>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: <u>Birds</u>: Hawk, heron, eagle, songbirds, other: _____ Mammals: Deer, bear, elk, beaver, other: <u>skunk, opossum, squirrel, rodents</u> Fish: Bass, salmon, trout, herring, shellfish, other: _____</p>	
<p>List any threatened and endangered species known to be on or near the site. The applicant is not aware of any threatened or endangered species in the subject site.</p>	
<p>List any invasive animal species known to be on or near the site. None are known.</p>	
<p>Is the proposal consistent with standard critical area buffers? Please describe. No critical area buffers apply to the site.</p>	

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. **X**
 Restoration of select locations along Salmon Creek.
 Other: _____
 Describe:

Water Resources	
<p>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)? No, there are no waterbodies on or adjacent to the site. Salmon Creek is approximately 3,000 feet east of the site and the White/Stuck River is approximately 4,000 feet south of the site.</p> <p>If yes, describe type of surface water body, including their name(s), stream classification, and whether there is a 100-year floodplain. If appropriate, state what stream or river the surface water body flows into.</p> <p>Will the proposal require or result in (check all that apply and describe below): any work over, in, or adjacent to (within 200 feet) the described waters? fill and dredge material that would be placed in or removed from surface water or wetlands? surface water withdrawals or diversions? discharges of waste materials to surface waters? groundwater withdrawal or discharge? X waste materials entering ground or surface waters? alterations of effects upon drainage patterns in the vicinity of the site? Describe: Dewatering may be necessary during construction and the project proposes to infiltrate stormwater runoff.</p>	<p>STAFF COMMENTS:</p>

<p>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. Permeable pavement is proposed as much as possible where horizontal separation from buildings and property lines is possible and vertical separation from the seasonal high groundwater elevation. A pump system will be included to route stormwater from lower areas to the permeable pavement areas. It is proposed to infiltrate stormwater as the primary discharge.</p>	
<p>Is the area designated a critical aquifer recharge area? If so, please describe: The site is within the wellhead protection areas for the County Springs and Sumner Springs wells.</p>	
<p>About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? Approximately 80 percent of the 7.24-acre site will be covered with hard surfaces. This will include the building areas, parking areas, pedestrian plazas and access. Sidewalks, vehicle circulation and parking areas will be permeable pavement. Less than 50% of the site will be covered in impervious surface.</p>	
<p>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): Compliance with critical area regulations. Compliance with SMC 13.48: stormwater management regulations. X 2012 Washington State Department of Ecology Stormwater Management Manual for Western Washington. NPDES Western Washington Phase II Municipal Stormwater Permit, - Minimum Technical Requirements for New Development and Redevelopment. X 2005 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound. Compliance with Shoreline Master Program (SMP). Other:</p>	
<p>Air Quality Checklist and Greenhouse Gases</p>	
<p>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. Dust will occur due to vehicle activity, placement of fill, and construction. Vehicles will produce emissions during and after construction.</p>	<p>STAFF COMMENTS:</p>

<p>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): Compliance with Washington Department of Ecology and Puget Sound Clean Air Agency Regulations X Compliance with Commute Trip Reduction Ordinance. Air quality control plans for construction activities. Best Management Practices used to control fugitive dust. X Measures to minimize air quality and odor issues caused by tailpipe emissions mobile construction equipment and portable stationary engines. Use of Greenhouse Gas Reduction Measures per Municipal Code or Exhibits 3-14 and 3-15 of Draft SEIS. Other:</p>	
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Land Use and Plans and Policies Checklist	
<p>What is the current use of the site and adjacent properties? (Add more explanation as needed beyond description in Part A.) The site currently is undeveloped. North of the site are additional homes and vacant land. To the east is 160th Avenue East and the Sumner YMCA. To the west and south are existing multi-family homes.</p>	<p>STAFF COMMENTS:</p>
<p>Describe any structures on the site. Will any structures be demolished? If so, what type, dwelling units, square feet? There are no existing structures onsite.</p>	
<p>What is the current comprehensive plan designation of the site? East Sumner Urban Village</p>	
<p>What is the current zoning classification of the site? The current zoning is Neighborhood Commercial adjacent to 160th Avenue East and Medium Density Residential on the western portion of the property within the East Sumner Neighborhood overlay.</p>	
<p>If applicable, what is the current shoreline master program designation of the site? Not applicable.</p>	
<p>What is the planned use of the site? List type of use, number of dwelling units and building square feet. Eight (8) multi-family buildings. Approximately 208 one to two-bedroom units and a lease and amenity area are proposed.</p>	
<p>What is the tallest height of any proposed structure(s)? Less than 50 feet feet.</p>	

<p>What are potential sources of light and glare? Light will be typical of an apartment building complex with parking lot lighting.</p>
<p>Does the proposal have the potential to affect solar access or cause undue shading? Buildings will be present where previously it was an open field. The buildings may cause shading outside of the property limits.</p>
<p>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. X Consistency with Shoreline Master Program (SMP). Consistency with applicable zoning standards and design guidelines. X Other:</p> <hr/> <p>Describe these measures and how they are incorporated into the development: The proposed multi-family development is consistent with projected land uses.</p>

Population, Employment, and Housing Checklist	
<p>Approximately how many people would reside or work in the completed project? This is very dependent on the future residential tenants. There will be approximately 208 residential units.</p>	STAFF COMMENTS:
<p>Approximately how many people would the completed project displace? None.</p>	
<p>Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. Approximately 208 middle income multi-family housing units are proposed.</p>	
<p>Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. None.</p>	
<p>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</p>	
<p>Consistency with Comprehensive Plan and applicable subarea plans, including the East Sumner Neighborhood</p>	

Plan. **X**
 Consistency with applicable zoning standards and design guidelines. **X**
 Other:

 Describe these measures and how they are incorporated into the development:
No additional measures are proposed besides what is listed in attachment B-1.

Public Services, Capital Facilities, and Utilities Checklist	
Police Protection: Would the project increase demand for police services? Can City levels of service be met? Yes, the project will increase demand for police protection. There are no development moratoriums in place and the project fits within the East Sumner Neighborhood Plan development thresholds.	STAFF COMMENTS:
Fire and Emergency Services: Would the project increase demand for fire and/or emergency services? Can levels of services be met? Yes, the project will increase demand for fire and emergency services. There are no development moratoriums in place and the project fits within the East Sumner Neighborhood Plan development thresholds.	
Schools: Would the project result in an increase in demand for school services? Can levels of services be met? Is an impact fee required? Yes, the project will increase demand for school services. School impact fees will be paid as required.	
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? The project is increasing the population of Sumner so an increased demand for parks and recreation is likely. There are no development moratoriums in place and the project fits within the East Sumner Neighborhood Plan development thresholds.	
Wastewater: Would the project result in an increased need for wastewater services? Can levels of service be met? The project is increasing the population of Sumner so there will an increased demand for wastewater treatment. There are no development moratoriums in place and the project fits within the East Sumner Neighborhood Plan development thresholds.	
Water Supply: Would the project result in an increased need for water supply or fire flow pressure? Can levels of service be met? The project is increasing the population of Sumner so there will an increased demand for domestic water and fire service. There are no development moratoriums in place and the project fits within the East Sumner Neighborhood Plan development thresholds.	

<p>Would the project impact stormwater quantity or quality? Can levels of service be met? Are City stormwater requirements met? The project proposes to treat and infiltrate runoff to meet City of Sumner standards to mitigate the impact to stormwater. There are no development moratoriums in place and the project fits within the East Sumner Neighborhood Plan development thresholds.</p>	
<p>Other Public Services and Utilities: Would the project require an increase in demand for other services and utilities? Can levels of services be met? Yes, the project will increase the demand for other utilities such as telephone, natural gas, power and cable. There are no development moratoriums in place and the project fits within the East Sumner Neighborhood Plan development thresholds.</p>	
<p>Proposed measures to reduce or control direct impacts on public services. THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): 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). Fire Services: Mitigation agreement between the developer and Sumner Fire & Rescue. 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. Water and Wastewater: Adequate service at the time of development per SMC 13.16 Adequate sewage disposal and SMC 13.24 Adequate water supply. Compliance with SMC 13.48: stormwater management regulations. X Other Measures to reduce or control public services and utilities impacts: _____ Describe:</p>	

<p>Parks and Recreation Checklist</p>	
<p>What designated and informal recreational opportunities are in the immediate vicinity? The Sumner YMCA is across the street and Rainier View Park is approximately 1/3 of a mile from the site.</p>	<p>STAFF COMMENTS:</p>
<p>Would the proposed project displace any existing recreational uses? If so, describe. No.</p>	
<p>Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: None are proposed.</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):

Compliance with Parks and Open Space Plan Update. **X**

Payment of a parks and recreation mitigation or impact fee. **X**

Other Measures to reduce or control parks and recreation impacts: _____

Describe:

Transportation Checklist

Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any. **160th Avenue East is adjacent to the east side of the property and serves the site. There is also easy access from SR-410, southeast of the site.**

Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop? **No. The site is approximately 1.6 miles from the Sumner train station.**

How many parking spaces would the completed project have? How many would the project eliminate? **The proposed project will have approximately 352 parking spaces and no parking spaces will be eliminated.**

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). **Frontage improvements along 160th Avenue East are proposed.**

How many PM peak hour vehicular trips per day would be generated by the completed project? Attach appropriate documentation. **Approximately 110 PM peak hour trips would be generated assuming 208 dwelling units. ITE Manual data sheets are attached.**

Proposed measures to reduce or control transportation impacts, if any:
 THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY):
 Trips in Ordinance Subsection 4.D(3)(a) are not exceeded, the project meets the Concurrency and

STAFF COMMENTS:
 Verify that:
 The Planned Action Project applicant has submitted documentation of the trips, required improvements, impact fees and other mitigation in comparison to the Planned Action SEIS and the Planned Action Ordinance.
 The City has verified incremental and total trip generation.

<p>Intersection Standards of Subsection 4.D(3)(b), and that the project has mitigated impacts consistent with Subsection 4.D (3)(c). X Installation of required improvements necessitated by development or that are part of Planned Action. Fair share contribution to improvements at City concurrency intersections and roads. Other measures to reduce or control transportation impacts: Frontage improvements are proposed. Describe:</p>	
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<p>Other Environmental Topics: City of Sumner 2010 Comprehensive Plan Update and Amendments EIS, November 2010</p>	
<p>Environmental Health and Noise Checklist and Mitigation Measures</p>	
<p>Describe any known or possible contamination at the site from present or past uses. No contamination is known to exist on site.</p>	<p>STAFF COMMENTS:</p>
<p>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. There is an existing gas line in 160th Avenue East, but it will not negatively affect the proposed development.</p>	
<p>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. None are proposed.</p>	
<p>Describe special emergency services that might be required. No special services will be required.</p>	
<p>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. Traffic noise exists from the adjacent streets and SR-410. The adjacent YMCA has noise from patron use, mostly in the summer months. The proposed project will produce traffic noise and noise from residents. Noise would mostly be during business hours 9 am – 9 pm.</p>	
<p>Proposed measures to reduce or control environmental health hazards, if any: THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION</p>	

<p>(CHECK ALL THAT APPLY): SMC Chapter 15.24 Fire Code X SMC Chapter 13.48 Illicit Discharge and/or Dumping Detection and Elimination X Model Toxics Control Act Chapter 70.105D RCW X Uniform Environmental Covenants Act Chapter 64.70 RCW X MTCA Cleanup Regulation Chapter 173-340 WAC Compliance with SMC Chapter 8.14 Noise Control measures for compatibility. X Other:</p>	
Historic and Cultural Preservation	
<p>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. There are no existing buildings onsite.</p>	<p>STAFF COMMENTS:</p>
<p>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. There are no known landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.</p>	
<p>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. None are proposed but if evidence is found during construction, activity will halt until the City is contacted and the site is evaluated.</p>	
<p>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. 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): Condition to stop construction if remains of historic or archeological significance are found. X Consultation with the Washington State Department of Archaeology and Historic Preservation. Where project is proposed on or immediately surrounding a site containing an archaeological resource a study is conducted by a qualified professional archaeologist Describe:</p>	

C. APPLICANT SIGNATURE. I DECLARE UNDER PENALTY OF THE PERJURY LAWS THAT THE INFORMATION I HAVE PROVIDED ON THIS FORM/APPLICATION IS TRUE CORRECT AND COMPLETE. I UNDERSTAND THAT THE LEAD AGENCY IS RELYING ON THEM TO MAKE ITS DECISION.

Signature:	
Date:	July 2, 2024

D. REVIEW CRITERIA

Review Criteria. The City’s SEPA Responsible Official may designate Planned Action Projects consistent with Subsection 4.E of this Ordinance, if all of the following criteria are met.

Criteria	Describe how your application and proposed development meets the criteria.
a. The proposal is located within the Planned Action area identified in Exhibit A.	The site is within the mapped area of Exhibit A.
b. The proposed uses and densities are consistent with those described in the Planned Action SEIS and Subsection 4.D of this Ordinance.	The proposed uses and densities are per the land use and zoning code of Sumner.
c. The proposal is within the Planned Action thresholds and other criteria of Subsection 4.D of this Ordinance.	The proposed project meets the threshold requirements of Section 4.D.
d. The proposal is consistent with the Sumner Comprehensive Plan.	The proposed project is consistent with the Sumner Comprehensive Plan.
e. The proposal’s significant adverse environmental impacts were identified in the Planned Action SEIS.	The proposed project does not have significant adverse environmental impacts.
f. The proposal’s significant adverse impacts have been mitigated by the application of the measures identified in this Exhibit B, Subsection 4.D of this Ordinance, and other applicable city regulations, together with any modifications or variances or special permits that may be required.	Applicable mitigation measures from Exhibit B will be specified for the development.

Criteria	Describe how your application and proposed development meets the criteria.
<p>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.</p>	<p>The proposed site will comply with all local, state, and federal laws as required.</p>
<p>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 4.E of this Ordinance.</p>	<p>The proposed site is not an essential public facility.</p>

Determination Criteria. Applications for Planned Action Projects shall be reviewed pursuant to the process in Subsection 4.G of this Ordinance.

Requirement	Staff Comments
Applications for Planned Action Projects shall be made on forms provided by the City and shall include the Subarea SEPA checklist included in this Exhibit B.	
The application has been deemed complete in accordance with SMC Title 18 Zoning.	
The application is for a project within the Planned Action Area defined in Exhibit A of this Ordinance.	
The proposed use(s) are listed in Subsection 4.D of this Ordinance and qualify as a Planned Action.	

E. SEPA RESPONSIBLE OFFICIAL DETERMINATION

A. Determination of Consistency - Qualifies as a Planned Action Project: The application is consistent with the criteria set forth in this East Sumner Planned Action Ordinance and has been determined to qualify as a Planned Action Project.

The project and underlying permit(s) review shall proceed in accordance with the applicable permit review procedures specified within SMC Title 18 Zoning, except that no SEPA threshold determination, SEIS, or additional SEPA review shall be required.

Notice of the Planned Action Determination of Consistency shall be made according to the notice requirements of the underlying project permit(s) pursuant to SMC Title 18 Zoning. If notice is not otherwise required for the underlying project permit(s), no special notice is required.

SEPA Responsible Official Signature:

Date:

B. Determination of Inconsistency - Does not Qualify as Planned Action Project: The application is not consistent with the criteria set forth in this East Sumner Planned Action Ordinance and has been determined to not qualify as a Planned Action Project for the following reasons: _____

Projects that fail to qualify as Planned Action Projects may incorporate or otherwise use relevant elements of the Planned Action SEIS, as well as other relevant SEPA documents, to meet their SEPA requirements. The SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action SEIS.

SEPA Process Prescribed: _____

SEPA Responsible Official Signature:	
Date:	

ATTACHMENT B-1 Mitigation Required for Development Applications

INTRODUCTION. The Planned Action SEIS has identified significant beneficial and adverse impacts that are anticipated to occur with the future development of the Planned Action Area, together with a number of possible measures to mitigate those significant adverse impacts. Please see Final SEIS Chapter 1 Summary for a description of impacts, mitigation measures, and significant unavoidable adverse impacts.

A Mitigation Document is provided in this **Attachment B-1** to establish specific mitigation measures based upon significant adverse impacts identified in the Planned Action SEIS. The mitigation measures in this **Attachment B-1** shall apply to Planned Action Project applications that are consistent with the Preferred Alternative range reviewed in the Planned Action SEIS and which are located within the Planned Action Area (see **Exhibit A**).

Where a mitigation measure includes the words “shall” or “will,” inclusion of that measure in Planned Action Project application plans is mandatory in order to qualify as a Planned Action Project. Where “should” or “would” appear, the mitigation measure may be considered by the project applicant as a source of additional mitigation, as feasible or necessary, to ensure that a project qualifies as a Planned Action Project. Unless stated specifically otherwise, the mitigation measures that require preparation of plans, conduct of studies, construction of improvements, conduct of maintenance activities, etc., are the responsibility of the applicant or designee to fund and/or perform.

Any and all references to decisions to be made or actions to be taken by the City’s SEPA Responsible Official may also be performed by the City’s SEPA Responsible Official’s authorized designee.

MITIGATION MEASURES

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.

Response: The project includes a geotechnical report that outlines the foundation design requirements and surcharge program for the site. Asphalt design will be done prior to site development submittal. Building design and construction will comply with the International Building Code as required.

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 24th Street and on the west side of the river which will be utilized to obtain mitigation credits for impacts to wetlands from the road projects. A larger connected mitigation bank would improve habitat value and water treatment functionality compared to the existing patches of fragmented wetlands within the East Sumner Neighborhood. The bank would use a watershed approach to integrate the wetland function into the comprehensive flood management plan. 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.

Response: No wetlands are present on this site per the Critical Area Report prepared for the project.

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:
 - 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.

Response: The Construction Stormwater Pollution Plan prepared for the project includes air quality mitigation measures as required, including spraying water to control dust, covering stockpiles and prevent tracking of sediments into public streets. Construction vehicles will be maintained regularly to minimize emissions.

- 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
Site Design	
Retain and enhance vegetated open spaces.	Retains or increases sequestration by plants.
Response: Vegetation has already been removed from the site.	
Plant trees and vegetation near structures to shade buildings.	Reduces onsite fuel combustion emissions and purchased electricity, and enhances carbon sinks.
Response: Landscaping plans will be prepared with building construction permit and they will meet the requirements of the City landscaping code.	
Minimize building footprint.	Reduces onsite fuel combustion emissions and purchased electricity consumption, materials used, maintenance, land disturbance, and direct construction emissions.
Response: The building sizes will be appropriate for the use.	
Design water efficient landscaping.	Minimizes water consumption, purchased energy, and upstream emissions from water management.
Response: Landscaping will likely be designed to be water efficient to reduce owner costs.	
Minimize energy use through building orientation.	Reduces onsite fuel combustion emissions and purchased electricity consumption.
Response: Building orientation will be considered when designing windows to minimize energy use and maximize natural lighting.	
Building Design and Operations	

Apply LEED standards (or equivalent) for design and operations.

Reduces onsite fuel combustion emissions and offsite/ indirect purchased electricity, water use, waste disposal.

Response: LEED certification may be considered as site and building design progresses.

Purchase Energy Star equipment and appliances for public agency use.

Reduces onsite fuel combustion emissions and purchased electricity consumption.

Response: This project does not include any public equipment, therefore this condition does not apply.

Incorporate onsite renewable energy production, including installation of photovoltaic cells or other solar options.

Reduces onsite fuel combustion emissions and purchased electricity consumption.

Response: Buildings will utilize natural lighting to reduce energy consumption.

Design street lights to use energy-efficient bulbs and fixtures.

Reduces purchased electricity.

Response: Street lights designed and constructed with this project will utilize energy-efficient bulbs and fixtures as required by the City of Sumner.

Construct “green roofs” and use high-albedo roofing materials.

Reduces onsite fuel combustion emissions and purchased electricity consumption.

Response: High-albedo roofing materials will be considered to reduce energy consumption during building design.

Install high-efficiency HVAC systems. Minimizes fuel combustion and purchased electricity consumption.

Response: High efficiency HVAC systems will be considered during building design.

Eliminate or reduce use of refrigerants in HVAC systems. Reduces fugitive emissions. Compare refrigerant usage before/after to determine GHG reduction.

Response: The HVAC system will be selected based on project requirements. Refrigerant use/need is unknown at this time.

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.

Response: It is likely that this project will include large windows and possibly skylights to maximize natural lighting.

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.

Response: If LEED accreditation is pursued, these energy efficient technologies will likely be incorporated into the design.

Use water-conserving fixtures that surpass building code requirements. Reduces water consumption.

Response: If LEED accreditation is pursued, water conserving fixtures will likely be incorporated into the design, otherwise they will meeting required building codes.

Reuse gray water and/or collect and reuse rainwater.

Reduces water consumption with its indirect upstream electricity requirements.

Response: Some reuse of rainwater may be used onsite with rain barrels for small landscaping areas.

Use recycled building materials and products.

Reduces extraction of purchased materials, possibly reduces transportation of materials, encourages recycling and reduction of solid waste disposal.

Response: If LEED accreditation is pursued, some recycled building materials may be incorporated into the project.

Use building materials that are extracted and/or manufactured within the region.

Reduces transportation of purchased materials.

Response: If LEED accreditation is pursued, local building materials may be incorporated into the project.

Use rapidly renewable building materials.

Reduces emissions from extraction of purchased materials.

Response: Rapidly renewable building materials will be considered for use during building design.

Conduct third-party building commissioning to ensure energy performance.

Reduces fuel combustion and purchased electricity consumption.

Response: If LEED accreditation is pursued, third-party building commissioning will be required.

Track energy performance of building and develop strategy to maintain efficiency.

Reduces fuel combustion and purchased electricity consumption.

Response: If LEED accreditation is pursued, tracking energy performance may be performed.

Transportation

Size parking capacity to not exceed local parking requirements and, where possible, seek reductions in parking supply through special permits or waivers.

Reduced parking discourages auto-dependent travel, encouraging alternative modes such as transit, walking, and biking. Reduces direct and indirect VMT.

Response: Onsite parking will likely be the required minimum for the use. Because transit does not serve this site, auto-dependent travel will likely be the most prevalent.

Develop and implement a marketing/information program that includes posting and distribution of ridesharing/transit information.

Reduces direct and indirect VMT.

Response: This is may be pursued after site development by building tenants or through the residential leasing office.

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.

Response: This is not practical for this development that only includes a leasing office and no access to transit.

Provide bicycle storage and showers/changing rooms.

Reduces employee VMT.

Response: Bike racks will be provided as required but showers and changing rooms will not due to the proposed only includes a small leasing office space proposed.

Use traffic signalization and coordination to improve traffic flow and support pedestrian and bicycle safety.	Reduces transportation emissions and VMT.
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Response: Traffic signal coordination is not part of this project.

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.
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Response: Street technology management is not part of this project.

Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Reduces idling fuel emissions and direct and indirect VMT.
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Response: The project is not large enough to require a shuttle system.

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.

Table B-1.2 Emission Reduction Measures

Measure Number	Title	Description	Range of Effectiveness
Transportation			
TRT-1	Voluntary Commute Trip Reduction	A successful program will include all of the following: carpooling encouragement; ride-matching assistance; preferential carpool parking; flexible work schedules for carpools; half-time transportation coordinator; vanpool assistance; bicycle end-of-trip facilities.	1.0 – 6.2%
Response: This may be pursued by individual tenants but is not part of the development of this site.			
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%
Response: This may be pursued by individual tenants but is not part of the development of this site.			
Building Energy			
BE-1	Use Building Insulation Methods That Surpass State Energy Code	Greenhouse gases (GHGs) are emitted as a result of activities in residential and commercial buildings when electricity and natural gas are used as energy sources. New buildings must be designed to meet the building energy efficiency standards of the state energy code, which regulates energy uses including space heating and cooling, hot water heating, and ventilation. By committing to a percent improvement over the state code, a development reduces its energy use and resulting GHG emissions.	0.2 – 5.5% for electricity usage 7-10% for natural gas usage
Response: Insulation materials will meet State Energy codes and will be selected during building design.			

Table B-1.2 Emission Reduction Measures

Measure Number	Title	Description	Range of Effectiveness
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.

Response: Programmable thermostats will likely be utilized on this project for both residential and commercial spaces.

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)
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Response: Energy Star appliances will be considered during the building design process.

Alternative Energy			
AE-2	Establish Onsite Renewable Energy Systems – Solar Power	Using electricity generated from photovoltaic (PV) systems displaces electricity demand that would ordinarily be supplied by the local utility. Since zero GHG emissions are associated with electricity provided by PV systems, the GHG emissions reductions are equivalent to	Variable

Table B-1.2 Emission Reduction Measures

Measure Number	Title	Description	Range of Effectiveness
		<p>the emissions that would have been produced had electricity been supplied by a local utility.</p> <p>Response: Adding photovoltaic systems may be considered if LEED accreditation is pursued.</p>	
Water Use			
WUW-3	Design Water Efficient Residential & Commercial Landscapes	<p>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.</p> <p>Response: Native landscaping vegetation and water efficient landscaping will likely be utilized on this project.</p>	0 – 70%
WUW-4	Use Water-Efficient landscape Irrigation System	<p>“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.</p> <p>Response: "Smart" irrigation controls will be considered during design of the landscape system.</p>	1 - 6.1%
Vegetation			
V-1	Urban Tree Planting	<p>Planting trees sequesters CO₂ while the trees are actively growing. The amount of CO₂ 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</p>	Variable by number of trees

Table B-1.2 Emission Reduction Measures

Measure Number	Title	Description	Range of Effectiveness
		carbon in biomass slows and will be completely offset by losses from clipping, pruning, and occasional death.	
		Response: Trees will be planted as part of the onsite landscaping. Dead plant material will be removed and replaced as part of site maintenance practices.	

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.

Response: Adjacent street frontage will be improved with sidewalk and lighting as required by City Code.

- 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.

Response: Stormwater is proposed to be infiltrated onsite meeting the 2019 Department of Ecology 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.

Response: Acknowledged.